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Going for Gold:

Engaging the Jewelry Industry in Responsible
Gold Sourcing in Africa's Great Lakes Region

By Holly Dranginis

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Executive Summary

For thousands of years, gold has represented love, tradition, wealth, beauty, and decadence. In the United States alone, these associations cause the gold jewelry industry to be worth more than five billion dollars annually.¹ Halfway around the world, however, the extraction and smuggling of gold serves as an important means of funding for armed groups and army commanders in the deadliest conflict since World War II. In the Democratic Republic of the Congo (“Congo”), violent armed actors mine, tax, and smuggle minerals and perpetrate widespread atrocities. Major supply chain reforms by electronics companies, coupled with the Dodd-Frank Act’s section on conflict minerals and the beginnings of a minerals certification process in the Great Lakes region of Africa, have led to a marked improvement in the security situation at tin, tantalum, and tungsten (3T) mines in Congo.² Over two-thirds of the eastern Congo’s 3T mines are conflict-free today.³ Gold, however, remains a major financial lifeline for armed actors. Ninety eight percent of artisanally mined gold⁴—estimated at a value of between \$383 and \$409 million in 2013—is smuggled out of the country annually, and much of that gold benefits armed commanders.⁵ Gold sold by armed groups into the global supply chain ends up in various products, including jewelry, which is the main overall end user of gold.⁶ Conflict gold thus taints the industry as a whole.

Fortunately, jewelry retailers and consumers can play important roles to help end the conflict gold trade and the suffering it causes, together with the actions of governments. Corporate and consumer behavior can lead to increased demand for responsibly sourced, conflict-free gold and promote investment in positive mining initiatives in the region. As the largest end-user of gold, making up around 45 percent of

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worldwide gold demand,⁷ jewelry companies have the ability to increase demand for conflict-free gold from Congo and the region.

Resolving the conflict gold problem in Congo and the Great Lakes region will require concerted efforts by a number of actors, including governments worldwide, especially the United States, India, China, the United Arab Emirates, and in the region. International and local civil society actors, mining and refining companies, and artisanal mining groups must also play a role. But leadership by the companies that sell jewelry is an indispensable component to changing market demand to favor enterprises that promote peace and prosperity over those that entrench violence and criminality.

The Enough Project has engaged with the largest jewelry retailers in an effort to encourage companies to use their power and resources in more robust, effective ways to support responsible sourcing in Congo and the Great Lakes region of Africa. To highlight leadership opportunities for companies that sell jewelry, Enough surveyed the 14 largest North American jewelry retailers through a detailed questionnaire and direct consultations.⁸ Our survey assessed what policies the retailers have adopted and which actions they have taken to counter the use of conflict gold.

Enough found that two companies in particular—Tiffany & Co. and Signet Jewelers—have demonstrated clear leadership in beginning to address the conflict gold issue by taking proactive steps to set up supply chain controls, contribute to solutions on the ground in Congo, and support the communities affected by mining and violence in Congo. Other companies are starting to follow suit. Cartier, JC Penney, and Target have distinguished themselves by taking important initial steps to implement more responsible policies, such as setting up requirements for their suppliers to source only from conflict-free gold refiners.

With the launch of a new campaign, Enough is highlighting jewelry companies that stand apart from their peers for their work to support responsible gold sourcing in Congo for several reasons. Overall, we aim to help change the financial incentives in the region from violent illegal mining and smuggling to legal, peaceful and prosperous gold mining. To that end, Enough encourages companies to conduct robust supply chain due diligence to eliminate their demand for gold linked to armed violence. Enough recognizes that jewelry companies have an important role to play as part of that overall effort to end the conflict gold trade in Congo and the region because we have seen the beneficial impact of the conflict-free consumer and industry movement on the 3T minerals and now wish to extend similar efforts to gold.

Some actors in the gold industry have taken steps to combat the trade in conflict gold, such as the London Bullion Market Association and World Gold Council auditing programs, but overall much more significant action from industry is needed, particularly from jewelry companies. Through research, policy analysis, and industry engagement, the Enough Project and our advocacy partners, including coalition groups such as the Conflict Free Sourcing Initiative (CFSI) as well as hundreds of students across the United States, United Kingdom, and Canada involved in our Conflict Free Campus Initiative (CFCI), work to recognize and incentivize leadership, help educate and guide consumers toward responsible purchasing decisions, and spur more efforts among retail companies to take action. Emerging industry leaders Tiffany and Signet, along with the companies taking initial action, offer hope that after years of opaque supply chains and violence on the ground, there are a range of actions that jewelry companies can take to ensure they are contributing to a conflict-free gold solution.

Consumers play an indispensable role in shaping company behavior. Consumer-driven demands have influenced and help expand the conflict-free policies and momentum of leading electronics companies. Electronics consumers pushed companies to engage in supporting conflict-free electronics products. Jewelry consumers can now likewise use their influence to encourage jewelry retailers to create conflict-free gold jewelry with gold from Congo and more actively support conflict-free gold initiatives in Congo and the surrounding region.

To guide companies and inform consumers who want to encourage positive behavior, Enough offers the following recommendations for positive company policies and practices:

Recommendations

- 1. Improve supply chain management and due diligence.** Companies should develop transparent policies about their gold sourcing practices and provide grievance mechanisms through which employees, consumers, and suppliers can report policy violations. Jewelry retailers should engage regularly with suppliers throughout their supply chain and invest in programs to make supplier surveying more robust and efficient. Increasing transparency regarding the global supply chain and highlighting best practices is vitally important to improving sourcing practices among retail companies.
- 2. Commit to sourcing from only certified conflict-free gold refiners.** Jewelry companies should publicly commit to sourcing only from certified refiners to support those refiners and also to encourage non-certified refiners to develop responsible sourcing practices. Gold refiners worldwide are increasingly becoming certified as compliant with credible conflict-free auditing programs in line with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance.⁹ Compared with six gold refiners certified conflict free by the Conflict Free Smelter Program (CFSP) in 2012,¹⁰ as of today, 52¹¹ refiners have passed credible conflict-free audits. However, there are still many refiners outside the system.
- 3. Join multi-stakeholder conflict-free sourcing groups.** Jewelry companies should participate in multi-stakeholder initiatives such as the Public-Private Alliance on Responsible Minerals Trade (PPA), the OECD Due Diligence Forum, and the Multi-Stakeholder Group of the Responsible Sourcing Network. These groups bring together companies, governments, and nongovernmental organizations to help companies participate in solutions that lead to measureable benefits in Congo and the Great Lakes region. Jewelry companies are underrepresented in these initiatives. Participation can help companies identify interests, challenges, best practices, and new ideas.
- 4. Invest in conflict-free gold sourcing initiatives in Congo.** Jewelry companies should work with their suppliers and with programs such as the USAID-supported Capacity Building for Responsible Minerals Trade and the PPA to set up conflict-free sourcing initiatives in Congo and the region. New initiatives to develop conflict-free gold mines and a formalized market for artisanally-mined gold are critical to changing the conditions that allow violent armed groups to make millions of dollars from illegally mined gold. These initiatives are just beginning to take shape in Congo and the region, but they need much greater support. Leadership in responsible sourcing requires more than just understanding where materials are coming from. It does not mean refusing to source from areas beset by violence.

Leadership instead requires taking proactive steps to improve a responsible minerals trade in high-risk areas.

- 5. Invest in alternative livelihood and community development programs.** Jewelry companies can play a role in developing and supporting livelihood programs and community initiatives that complement large-scale conflict-free mines and an increasingly formalized artisanal gold sector. These livelihoods and community initiatives are necessary to ensure that mining communities have sustainable, diverse sources of income and to guarantee the rights of mining communities, including protection from any potential adverse impact of large-scale mining.

Congo's conflict gold

The people of eastern Congo have endured brutal armed conflict for over two decades, fueled in large part by the region's rich natural resources. Armed groups obtain significant funds to sustain their violent activities by illegally mining and selling minerals—gold, tin, tantalum, and tungsten—that are eventually used to make consumer products sold around the world. The global market has brought revenues that enrich those who control access to gold and perpetrate brutal war crimes against civilians like mass rape, murder, forced displacement, and the recruitment of child soldiers.¹²

Over the past four years, there has been significant progress in reducing armed groups' profits from trade in three out of the four conflict minerals. Today, the International Peace Information Service reports that almost 74 percent of 3T miners are currently working in mines where no armed group involvement has been reported,¹³ in stark contrast to four years ago when, the U.N. Group of Experts found almost every mining deposit in the Kivu provinces under the control of a military group.¹⁴ This shift is due in part to regional reforms in the mining sector and the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank law"), requiring all publicly traded companies in the US that use tin, tantalum, tungsten, or gold in their products to report on their measures to determine whether their minerals are linked to armed violence in Congo or the surrounding region.¹⁵ Progress is also due to the leadership of electronics companies like Intel, HP, and Motorola Solutions, that depend on these minerals to make cell phones, computers, and other products and have taken bold steps to support positive change. Several of these companies are not only implementing innovative supply chain assurance programs but also investing in conflict-free sourcing initiatives in Congo. This is the kind of bold, targeted investment jewelry companies should take to help improve security and livelihoods in the gold sector.

Unfortunately, the trade in conflict gold continues to finance armed groups, according to the U.N. Group of Experts on the Congo.¹⁶ Congo's conflict gold is mainly smuggled through the neighboring states of Uganda and Burundi, and then on to Dubai, entering the global market and tainting the entire gold supply chain.¹⁷ The conflict gold trade is linked with artisanally mined gold in eastern Congo— an estimated minimum of eight to 10 tons per year—whereas industrially mined gold by Banro and AngloGold Ashanti/Randgold is currently conflict-free.¹⁸ Congo accounts for just under one percent of the global gold

supply,¹⁹ but the roughly \$400 million worth of revenues from this trade for armed actors helps drive significant violence on the ground in Congo.

The gold standard

The Enough Project surveyed the top 14 jewelry “supersellers”—retailers with the largest sales in North America. We asked questions based on a comprehensive analysis of what factors would best help end conflict gold trading and increase peace and development in eastern Congo and the surrounding region. Those questions covered internal policies and protocols related to supplier engagement, involvement in multi-stakeholder groups and forums, and support to in-region initiatives including conflict-free gold sourcing projects and community development. Most companies responded at least once, and some engaged in more regular dialogue. In addition to direct company responses, we allocated points based on several public information sources, including company websites, public multi-stakeholder forums, and company reports filed with the Securities and Exchange Commission.

Among the 14 companies surveyed, Signet Jewelers and Tiffany & Co. stood out for their leadership and engagement on conflict gold. These leaders have distinguished themselves with numerous concrete actions aimed at improving their own supply chains, the responsible practices of the industry writ large, and the welfare of communities in eastern Congo and the wider Great Lakes region. Cartier, JC Penney, and Target deserve recognition for their initial actions on conflict gold.

Signet Jewelers: Developing sharable supply chain due diligence protocols and sourcing conflict-free gold from Congo

Signet Jewelers is the parent company of several subsidiary jewelers, including the well-known U.S.-based retailers Jared, Kay Jewelers, and Zale, as well as U.K.-based H. Samuel and Ernest Jones. Signet’s stores represent a broad cross-section of the jewelry market, and the jewelry Signet sells is accessible to a wide range of consumer income levels. Signet is the largest specialty jeweler in the United States, United Kingdom, and Canada. Its subsidiary, Kay Jewelers, is the leading middle-market specialty jewelry retailer in the United States.²⁰ Signet has a strong company policy on conflict minerals, which it uses in interactive employee and supplier trainings worldwide. Signet holds strategic meetings with its suppliers to encourage responsible sourcing practices in Congo and the Great Lakes region of Africa, demonstrating a clear commitment to encouraging sourcing and investment in the region, not abandonment. Signet has also demonstrated leadership in multi-stakeholder dialogues. It helped spearhead one of the first events on conflict-free sourcing at a Jewelers of America exposition, at its New York show in 2014, and it has supported other public events on responsible sourcing.

Two initiatives in particular set Signet apart: the development and dissemination of the Signet Responsible Sourcing Protocols (SRSPs), and its efforts to source conflict-free gold from Congo. Signet’s SRSPs “outline the procedures required for its suppliers to ensure that all supplies including gold are conflict-free.”²¹ The protocols, updated regularly, are an innovative, comprehensive set of guidelines the help suppliers trace

their gold supply and communicate its origins to Signet’s subsidiary companies. The protocols should, however, require suppliers to only source from conflict-free refiners audited by programs in full accordance with the Conflict-Free Smelter Program. The guidelines, for example, currently list the Dubai Multi Commodities Centre (DMCC)’s auditing program as an acceptable program for supplier certification, yet multiple investigations in early 2014 clearly pointed to problems with the Dubai protocols.²² Protocols like Signet’s SRSPs are taking hold in other industries related to tin, tantalum and tungsten, but few address the more difficult task of tracing gold through the supply chain. The work Signet has done to develop rigorous standards have implications beyond their own company practices. By sharing the protocols widely among peer companies and across industries, and by even offering robust trainings on the SRSPs, Signet has demonstrated true leadership in ensuring a range of companies and industries can make good use of the protocols for the improvement of gold supply chain management writ large.

Signet has taken bold steps to ensure its commitment to responsible sourcing supports legitimate business for Congo’s gold sector, resisting the temptation to source exclusively outside of Congo to guarantee a purely conflict-free supply chain. Signet knowingly sources gold from Rand refinery, a London Bullion Market Association-certified conflict-free refinery, which sources conflict-free industrial gold from Congo through Banro and AngloGold Ashanti. Signet has developed and shared strategies for sourcing conflict-free gold from Congo. Signet has implemented the strategies as company practices—a bold step none of the other surveyed companies could claim, but that can inspire efforts by all companies.

Tiffany & Co.: Supporting communities and encouraging ethical mining practices

Tiffany & Co. is one of the most recognizable American jewelry brands and a leader in responsible business practices. Tiffany is a founding member of the Initiative for Responsible Mining Assurance (IRMA), a multi-stakeholder group that is developing innovative draft standards on responsible mining practices. These practices have the potential to transform the way mining companies conduct their business, ensuring uniquely high standards related to environmental, human rights, and social impact. These standards are particularly important in eastern Congo, where new large-scale mining projects are important to building a regulated, prosperous, reformed minerals sector, but where the potential for negative environmental and social impact is high, with large civilian populations and rare biodiversity in minerals-rich areas.

Tiffany is responding to the growing needs of mining communities in eastern Congo by dedicating significant funds through the Tiffany & Co. Foundation to support locally-led projects that will help formalize artisanal mining in the area. The foundation is making a grant of over \$50,000 to the Diamond Development Initiative for a 20-month project that will help support local community-based organizations dedicated to working with local mining-affected populations and local gold miners. The project will build capacity in a number of areas, including business planning, mediation, conflict resolution, and improved mining safety. These projects are crucial to helping complement new traceability systems and conflict-free gold sourcing initiatives. Such projects ensure that communities that depend on the current system are able to access and benefit from a more formalized, peaceful mining sector.

Areas of achievement

The overall survey results revealed a number of areas of collective progress in recent years by leading North American jewelry retailers.

- **Company policies:** Eleven out of the 14 surveyed companies have developed publicly accessible policies clarifying their positions and practices related to conflict minerals, including gold. This is critical for employee and consumer education and for aligning internal company practices with agreed-upon standards.
- **Supplier engagement:** Communicating with suppliers and refiners is key to supply chain management and supporting conflict-free gold initiatives in the Great Lakes region. Eight companies demonstrated strong efforts to improve this aspect of their business practices. These companies reached out to suppliers to disseminate their conflict minerals policy, established supplier inquiry mechanisms related to the company's supply chain management, conducted supplier trainings for more responsible sourcing, or carried out some combination of these three activities.
- **Commitments to implement internationally recognized due diligence guidance:** Nine companies have publicly committed to implementing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, an important framework for supply chain due diligence.²³ It is critical that jewelry companies understand and commit publicly to implementing these guidelines, which most have done, thanks in part to the requirements of Conflict Minerals Rule issued by the Securities and Exchange Commission in accordance with Section 1502 of the Dodd-Frank law.

Room for improvement

Despite these significant first steps, much more must be done by jewelers. The Enough Project survey identified the following areas for improvement:

- **Multi-stakeholder initiatives on conflict minerals:** A few important multi-stakeholder initiatives on conflict minerals have established regular dialogues and work projects to bring together diverse actors to discuss best practices and challenges, solve problems, and develop and implement innovative solutions. Jewelry companies are noticeably absent from the majority of these groups, leaving a significant gap in expertise and input. Jewelers should join these initiatives, in particular the Public-Private Alliance on Responsible Minerals Trade (PPA), the OECD Due Diligence Forum, and the Multi-Stakeholder Group of the Responsible Sourcing Network.
- **Participation in conflict-free sourcing initiatives:** Companies can establish conflict-free supply chains while also benefiting communities in Congo by investing in the growth of conflict-free gold sourcing initiatives. The Solutions for Hope and Conflict-Free Tin Initiative for tantalum and tin have demonstrated that companies can source conflict-free minerals from Congo and that prices that Congolese artisanal miners can get for their minerals can increase.²⁴ Jewelers should establish similar

conflict-free gold sourcing programs in Congo to help clean up the regional gold trade. There are multiple emerging opportunities to do so – USAID’s new Capacity Building for Responsible Minerals Trade (CBRMT) project is currently working to help develop conflict-free artisanal gold mines in the Kivus. The PPA has supported conflict-free gold projects with Partnership Africa Canada. Resolve is currently organizing a dialogue around this concept. Jewelers can also engage their suppliers and begin their own initiatives.

- **Supporting communities:** Supply chain due diligence and even investment in conflict-free gold mining initiatives in Congo is incomplete without support to local communities in the region. Large-scale mining has many benefits and some adverse impacts on local communities, as do market changes that make untraceable minerals less lucrative than traceable ones. Jewelry companies’ foundations and corporate philanthropic strategies can play an important role in supporting locally-led development initiatives and ensuring a consultative, rights-based approach to communities affected by mining and sourcing projects of all sizes.

Innovation in progress: New initiatives for conflict-free gold and local development

Refiner certification programs

Over the past five years, industry coalitions, including non-governmental partners, have developed programs to audit the smelters and refiners that constitute the “choke point” of the minerals supply chain. The main programs targeting the choke point are the Conflict-Free Smelter Program (CFSP), the London Bullion Market Association (LBMA) Responsible Gold Guidance, and the World Gold Council Conflict-Free Gold Standard. By having independent third-party auditors verify the conflict-free policies and practices of refiners and mining companies, these auditing programs present a consistent, consolidated approach to vetting and approving the supply chain management. This eases the burden of supply-chain management on retail companies and lends consistency to those management practices across companies and industries. The LBMA’s “Good Delivery” list of refiners must comply with the LBMA Responsible Gold Guidance, which follows the OECD framework for risk assessment, giving companies and suppliers an accessible, transparent way to identify and do business with conflict-free refiners. The CFSP arranges for independent private sector auditors to inspect mines of origin and the chains of custody used by its participating refiners.

Solutions for Hope Gold

The Solutions for Hope network, a group committed to creating responsible sourcing initiatives in Congo, has developed a successful model for conflict-free closed-pipe mines. In 2011, two electronics companies, Motorola Solutions and AVX, teamed up with a smelter, F&X, as well as the mining company MMR and the Congolese artisanal mining cooperative (CDMC), to create the conflict-free Solutions for Hope tantalum mining project in Katanga province. Since 2011, the pilot program has expanded to a new mining area in Rubaya, Masisi, North Kivu, where some of the worst of the violence in Congo has been concentrated. The Solutions for Hope projects demonstrate that conflict-free sourcing from eastern

Congo is possible with the right kind of collaboration and investment. The success of their pilot projects in the tin and tantalum sectors has encouraged the group to expand its application of supply chain assurance solutions to gold. Given the necessary due-diligence practices that the Dodd-Frank law requires for sourcing gold from the DRC, increasing the quantity of legitimate sourcing opportunities by such an expansion could be hugely beneficial to down-stream companies.

Acknowledging the ongoing problem of conflict gold, the Solutions for Hope Network has initiated expansions into the gold sector in a few key ways. The Solutions for Hope Network is working to ensure transparency in transactions between mines and refiners. The network is also expanding access to both large- and small-scale conflict-free mining operations in Congo. These efforts are designed to increase the amount of responsibly sourced gold that is available to the companies seeking it. These efforts also support the economic wellbeing of communities and miners affected by the Solutions for Hope projects.

Formalizing the Artisanal Gold Sector

Artisanal gold mining—small-scale, low-tech surface mining often conducted relatively informally by subsistence miners—accounts for the vast majority of gold mining in eastern Congo. Ninety-eight percent of that artisanally mined gold coming from Congo is smuggled.²⁵ To generate the certifiable conflict-free gold that suppliers will seek, it is critical that the artisanal gold sector undergo reforms to make mining safer and improve the wellbeing of gold miners and the families they support.

The USAID Capacity Building for Responsible Minerals Trade project implemented by Tetra Tech is currently leading efforts in eastern Congo to help begin to formalize the artisanal gold sector. The project is currently considering different models for such an initiative, and it plans to work with the International Organization on Migration, the U.N. mission in Congo, and artisanal mining experts in helping to validate up to 100 more gold mines as conflict-free and help bring more artisanal gold into the formal sector. This will build upon the work of Partnership Africa Canada (PAC), a nonprofit organization that implemented a gold formalization project in Orientale province of Congo in 2013 and 2014 with the Diamond Development Initiative, a group that has worked with artisanal diamond miners and their communities. Additionally, USAID and Banro Corporation have announced a public-private partnership, which is open to other corporate contributions, to help formalize legal, conflict-free artisanal mining in areas in and around industrial mining areas in ways that benefit both investors and local populations.

By supporting the formalization of the artisanal gold sector, retail companies have an opportunity to expand their access to conflict-free gold while encouraging responsible practices that benefit locals. Formalizing the artisanal gold sector, and moving the enormous wealth of Congo's artisanal gold through conflict-free supply chains would supply jewelry companies with responsibly sourced material while benefiting communities and enhancing the welfare of the people whose livelihoods depend on artisanal gold mining.

Conclusion

Violence has been raging in eastern Congo for almost two decades, fueled in part by the region's lucrative natural resources. Leadership among jewelry retailers can help break the link between gold and violence in Congo. Tiffany and Signet have demonstrated the powerful beneficial impact jewelers can have in improving the gold supply chain. But much more is needed. By building on the leadership and efforts of Tiffany and Signet, by collaborating with industry partners, adopting international standards and practices developed by other conflict-free initiatives, jewelers can help make gold a boon for the people of Congo and the Great Lakes region.

Endnotes

¹ World Gold Council, "Gold Demand Trends, Third Quarter 2014," p. 19, November, 2014, available at <http://www.gold.org/supply-and-demand/gold-demand-trends>.

² See Fidel Bafilemba, Timo Mueller, and Sasha Lezhnev, "The Impact of Dodd-Frank and Conflict Minerals Reforms on Eastern Congo's War," (Washington: The Enough Project, June 2014), available at <http://enoughproject.org/reports/impact-dodd-frank-and-conflict-minerals-reforms-eastern-congo%E2%80%99s-war>; Steven Spittaels, Ken Matthysen, Yannick Weyns, Filip Hilgert and Anna Bulzomi, "Analysis of interactive map of artisanal mining areas in Eastern DR Congo: May 2014 update," (Antwerp: International Peace Information Service, May, 2014), p. 12, available at <http://ipisresearch.eu/download.php?id%3D452>.

³ See Fidel Bafilemba, Timo Mueller, and Sasha Lezhnev, "The Impact of Dodd-Frank and Conflict Minerals Reforms on Eastern Congo's War," (Washington: The Enough Project, June 2014), available at <http://enoughproject.org/reports/impact-dodd-frank-and-conflict-minerals-reforms-eastern-congo%E2%80%99s-war>; Steven Spittaels, Ken Matthysen, Yannick Weyns, Filip Hilgert and Anna Bulzomi, "Analysis of interactive map of artisanal mining areas in Eastern DR Congo: May 2014 update," (Antwerp: International Peace Information Service, May, 2014), p. 12, available at <http://ipisresearch.eu/download.php?id%3D452>.

⁴ Artisanally mined gold is gold mined informally using low technology or with minimal machinery.

⁵ U.N. Security Council, "Final report of the Group of Experts on the Democratic Republic of the Congo," S/2014/42, para. 171, January 23, 2014, available at <http://www.un.org/sc/committees/1533/egroup.shtml>.

⁶ Gold mine production in the DRC in 2013 was 25.3 tonnes. Global gold mine production in 2013 was 3022.1 tonnes. Thus in 2013 the DRC accounted for .837% of global gold mine production. See Thomson Reuters, "[Gold Fields Mineral Services] GFMS Gold Survey 2014," (London: April 2014), pp. 36-37, available at <https://forms.thomsonreuters.com/gfms/>.

⁷ World Gold Council, "Supply and Demand, Jewellery," available at <http://www.gold.org/supply-and-demand/demand/jewellery> (last accessed November 2014).

⁸ The 14 companies are: Signet Jewelers, Target Corporation, Tiffany & Co., J.C. Penney Company, Inc., Wal-Mart Stores, Inc., Macy's, Inc., Sears Holdings Corporation, Neiman Marcus Group Ltd LLC, Costco Wholesale Corporation, Helzberg Diamonds, QVC, Inc., Ross-Simons, Jewelry Television, and Cartier. National Jeweler, "\$100 Million Supersellers," available at, <http://www.nationaljeweler.com/galleries/products/100-Million-Superse-1443.shtml#16>. The Enough Project included the top 15 from this list, then eliminated Zale Corporation after it was purchased by Signet Jewelers Limited, bringing the list of participating companies to 14.

⁹ The full name is the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

¹⁰ Electronics Industry Citizenship Coalition and Global e-Sustainability Initiative, “Conflict-Free Smelter Program Compliant Gold Refiner List,” last updated July 2012, available at: http://www.unimetal.com/pdf/Ohio_CFS_Compliant_Gold_Refiners.pdf (last accessed November 2014).

¹¹ See Electronics Industry Citizenship Coalition and Global e-Sustainability Initiative, “Conflict-Free Smelter Program Indicators,” available at <http://www.conflictreesourcing.org/program-indicators/> (last updated November 17, 2014; last accessed November 2014).

¹² See U.N. Security Council, “Final report of the Group of Experts on the Democratic Republic of the Congo,” S/2014/42.

¹³ Spittaels, Matthysen, Weyns, Hilgert and Bulzomi, “Analysis of interactive map of artisanal mining areas in Eastern DR Congo,” p. 12.

¹⁴ U.N. Security Council, “Interim report of the Group of Experts on the DRC,” S/2010/252, para. 77, May 24, 2010, available at http://www.un.org/ga/search/view_doc.asp?symbol=S/2010/252.

¹⁵ Bafilemba, Mueller, and Lezhnev, “The Impact of Dodd-Frank and Conflict Minerals Reforms on Eastern Congo’s War.”

¹⁶ U.N. Security Council, “Final report of the Group of Experts on the Democratic Republic of the Congo,” S/2014/42, pp. 3, 17, 18, 23, 24, 26, 27, 35-42.

¹⁷ For more background information, see The Enough Project, “From Child Miner to Jewelry Store: The Six Steps of Congo’s Conflict Gold,” (Washington: October 2012), available at <http://www.enoughproject.org/files/Conflict-Gold.pdf>.

¹⁸ Spittaels, Matthysen, Weyns, Hilgert and Bulzomi, “Analysis of interactive map of artisanal mining areas in Eastern DR Congo,” p. 12 and Enough Project interview with regional gold industry expert, Kinshasa, November 2, 2014.

¹⁹ Gold mine production in the DRC in 2013 was 25.3 tonnes. Global gold mine production in 2013 was 3022.1 tonnes. Thus in 2013 the DRC accounted for .837% of global gold mine production. See Thomson Reuters, “[Gold Fields Mineral Services] GFMS Gold Survey 2014,” (London: April 2014), pp. 36-37, available at <https://forms.thomsonreuters.com/gfms/>.

²⁰ National Jeweler, “Top 50 North American Jewelry Retail Chains,” <http://www.nationaljeweler.com/galleries/products/Top-50-North-America-1335.shtml> (last accessed November 2014).

²¹ Signet Jewelers, “Signet Responsible Sourcing Protocol for Conflict-free gold,” revised September 2013, available at http://www.signetjewelers.com/files/doc_downloads/Signet-Responsible-Sourcing-Protocol-for-Gold-revised-September-2013.pdf (last accessed November 2014).

²² Andy Verity, “Gold market breaches covered up,” BBC News, February 25, 2014, available at <http://www.bbc.com/news/business-26341072>.

²³ The U.N. Security Council due diligence guidance provides another important framework. These guidelines, entitled, “Due diligence guidelines for the responsible supply chain of minerals from red flag locations to mitigate the risk of providing direct or indirect support for conflict in the eastern part of the Democratic Republic of the Congo,” are available at http://www.un.org/sc/committees/1533/pdf/due_diligence_guidelines.pdf (last accessed November 2014).

²⁴ Solutions Network, “Conflict Free Tin Initiative,” available at <http://solutions-network.org/site-cfti/> (last accessed November 2014).

²⁵ U.N. Security Council, “Final report of the Group of Experts on the Democratic Republic of the Congo,” S/2014/42, para. 171; U.N. Security Council, “Midterm report of the Group of Experts on the Democratic Republic of the Congo,” S/2013/433, July 19, 2013, available at <http://www.un.org/sc/committees/1533/egroup.shtml>; and Spittaels, Matthysen, Weyns, Hilgert and Bulzomi, “Analysis of interactive map of artisanal mining areas in Eastern DR Congo,” p. 12.