

The Honorable Mary Jo White
Chair
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Monday, 14 April 2014

Re: SEC rule implementing the Dodd-Frank Act (Section 1504)

Dear Chair White,

We are a group of 544 civil society organisations from 40 countries, united by the Publish What You Pay (PWYP) Campaign and writing to urge the Securities and Exchange Commission (SEC) to re-issue an implementing rule for the Dodd-Frank Wall Street Reform and Consumer Protection Act (Section 1504) that aligns with the EU Accounting and Transparency Directives, with no country exemptions and full public disclosure of payments, without delay.

We, the signatories to this letter, represent the depth and breadth of the PWYP Campaign, including human rights, faith-based, anti-corruption and environmental organisations. We are from countries rich in natural resources, but blighted by corruption, conflict and poverty. We see on a daily basis the destructive effects that poor governance of natural resources has on our communities. Greater transparency of extractive industry revenues will reduce natural resource related corruption and conflict, and help ensure these resources are transformed into lasting public benefits.

We commend the SEC for its dedication in developing Section 1504's original implementing rule, which followed Congress's clear intent to make publicly available detailed information regarding revenue payments made to governments worldwide. We are extremely disappointed that a U.S. District Court vacated the rule.

However, the Court's ruling does not preclude the SEC from requiring full public disclosure of project-level payments or denying exemptions, and we believe the SEC has the discretion to retain these critical provisions in the final rule, as long as sufficient justification is given.

Project-level reporting will bring great benefits to citizens' groups in resource-dependent countries. Some of the signatories to this letter work in areas where numerous extractive companies are active, and in order to ensure that each company is meeting its fiscal obligations to the host government and community, we need to know the identity of individual company making the payment.

In other areas, a single company dominates production and makes numerous payments that arise from individual projects. Citizens in these areas need to be able to identify which project

each payment originates from in order to be able to meaningfully monitor individual payments, which can reach up to US\$1 billion. As the original 1504 rule recognises, contracts provide the basis for determining the payments that arise from resource projects. As such, the SEC should ensure that the final rule requires contract-based project-level reporting, so that communities are able to track payments from project to government.

Conversely, publishing compilation reports of data aggregated from multiple projects or keeping company names hidden from public view would deprive citizens of this vital information, allow extractive firms to hide questionable payments behind aggregated and anonymised data, and defeat the purpose of the Section 1504 law.

The importance of full project-level transparency is heightened further in areas where local revenue-sharing agreements are in place. In the Democratic Republic of Congo, for example, national law stipulates that 25% of tax revenues from individual mining projects should go back to the province, and 15% back to the local territory or town where development takes place. However, communities are currently not in a position to claim the tax money they are entitled to, as there is no way of knowing how much a given local project is generating in taxes.

Similarly in the Philippines, indigenous communities have a legal right to a minimum of 1% of royalties from mining in their ancestral domains. However, none collect this full amount, and there is little revenue transparency to help them do so. Project-level reporting would help communities to collect their entitlements, as well as help the government keep track of the royalties generated.

By helping to usher in a new era of stability and prosperity in resource-dependent countries and contributing to global energy security, Section 1504 will also deliver benefits for investors and companies. In order to achieve these positive results, the final rule must:

- ensure full public disclosure of payments, including the identity of reporting companies;
- require contract-based project-level reporting;
- include no country exemptions; and
- set a reporting threshold of US\$100,000.

This would align the U.S. with the global standard for extractive revenue transparency, which includes the EU Accounting and Transparency Directives, as well as similar legal developments in Norway and Canada.

The United States has shown great leadership in the field of natural resource transparency, for which the communities we work with and represent are extremely grateful. Kofi Annan, Chair of the Africa Progress Panel, has urged the SEC to maintain its high transparency standards, and described efforts by the American Petroleum Institute to prevent meaningful disclosure as a “blip on the road to greater transparency.”

We sincerely hope the SEC will continue to support progress towards a global transparency standard by moving swiftly to produce a strong final rule, which will help achieve the goals of reducing corruption, poverty and instability in resource-dependent countries.

On behalf of the Publish What You Pay Coalition,

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Sarybayev Rysbay, "Altyn Bulak" NGO (Naryn)
Atabekov Turgunbek, "FOAT" Public Association (Chatkal)
Bekturova Arsar, "Karek" Public Association (Issyk-Kul)
Madzhikov Zhyrgal, "Bai Too" NGO (Issyk-Kul)
Imanbekova Nazik, "Elnaz" Centre of Information and Human Resources (Talas)
Toktosunova Ryskul, Health and Education of the XXI century Youth (Talas)
Iskanov Ulanbek, "Kozhoy-Serek" (Batken)
Amatova Nurzhamal, "Agrotechnology" Public Foundation (Osh)
Beirshanova Lyubov, Issyk-Kul State University named after Tynystanov, Ecology Department
Beyshe uulu Kachyke, "Manas Murasy-El Kamy" (Chaek Village)
Momuntayeva Arzykan, Ombudsman for the Talas Region
Niyasaliyev Muratbek, "Talas Regional Youth Council" Public Association
Alymov Abdrashid, Ala-Buka ayyl okmotu
Karymshakov Chyngyz, "Lawyer and Co." Public Foundation (Sulyukta)
Murat Shamil, Coalition for Democracy and Civil Society (Talas)
Zhenishova Altynay, "Sedep" Public Association (Kazarman)
Temirberdiyev Abdylida, "Marendan" Public Foundation (Chon Alay)
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Makhmudov Rahimjon, PA "Analytical and Advisory Centre"
Tojinisso Azizov, OO "Hukukshinson"
Michael Petrushkov, Assosiatsiyai "Markazi Rushdie Sohibkor Chumhurii Tochikiston"
Konstantin Bondarenko, Center of the free market of Tajikistan
Zarina Khalikova, Center for Training and support to NGOs
Dodarbekov Saidaliyev, NGO Shahrvand
Bahram Mamadaliev, NGO Tabiati toza
Shaukat Azamov, NGO "Center for Community Development"

Zohra Sharipov, PA "Madad"
Sangak Rakhmonov, NGO Punbachi
Ogonazar Akanazarovich Aknazarov, NGO Ecocenter "Pamir"
Anna Shukurova, NGO "Union of professional consultants in Tajikistan"
Ali Akbar Abdulloev, NGO Center for Anti-Corruption Education and Promotion
Oshii Milli, NGO Hurinisso Gafforzoda
Karimov Mavzuna, Centre for Social-economic and educational development
Muazzama Burkhanova, Foundation "Dastgir Center"
Sangakov Saidhodzha, NGO Agrofond
Rustam Gulov, NGO GIV Accent
Payrav Saidov, NGO Calidi Donish
Mirzoeva Mayram, NGO Fayzbahsh
Tursunoi Isomidinova, NGO Nilufar
Rano Dzhumaeva, NGO Tomiris
Dilshod Alimov, Tajik Association of Promotion of Tourism
Tuhfa Sadykova, NGO Dyer

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Olena Pavlenko, Dixi Group
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Altukhov Vadim, Public Control

MIDDLE EAST & NORTH AFRICA

Iraq

Ali Mohammad Neema, Rafidai Al Iraq Organisation
Mohammad Adnan Kahtan, Akad Cultural Institute
Dr, Ghaith al Janabi, Mercy Hands Organisation
Saadeeya Al saalihi, Together to Protect Man and Environment Organisation
Khalidoun Kubba, Iraqi Organisation for Reconstruction
Muqdad Al Difaa'e, Association for University and Institutes Graduates in Iraq
Abdullah Hajji, Al Ikhaa2 Democratic Organisation
Ibtissam Al Shammari, Women for Welfare of Women Organization
Kassem Madhari, Iraqi Center for Human Rights Activists
Kifaah Al Jawahiri, Al Amal Iraqi Association
Ali Abboud, Rafiday Association for Human Rights
Sanaa Al Tai, Democratic Women Organisation
Firyal Al Kaabi, Awan Capacity Building and Raising Awareness Org
Ahmad Shammari, Al Hubouby Institute for Iraqi Youth and Students
Yahya Hafeth, Syndicate for Engineers
Abdel Bari Salmaan, Union for Businessmen, Ninawa branch
Bassem Antoine, Union of Businessmen, Baghdad
Ibrahim Ibrahim, Al Massala Organisation for Human development
Alaa Al Asadi, Eternal Fire Center for Oil Development
Tahseen Al Mawla, Association of Journalists and Young writers, Iraq
Imad AL Timimi, Center for Corruption Detection
Amina Ali, Iraqi Institute

Abeer Ibrahim, Arab Youth Organisation
Maher Al Obaidi, Association for Children rights and Family Protection
Khaled Nakshbandi, Towards Citizenship Organisation
Haydar Battat, Al Huda Organisation for Strategic Studies, Missan
Salah Saleh, Al Rafiday Institute for Civic Culture
Nidal Abboudi, Mawtinee Organisation
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Ahmad Khafaji, Committee to Support Integrity
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Hadi Shwaykh, Ashour Institute for Development and Sustainability
Mohammad Jabbouri, Al Haq Organisation
Imaan Al Laami, Independent Amal Association
Maytham Al Khazaali, Scientific Assembly for Education and Rehabilitation
Dr. Qusay Abboud, Tawasul Organisation for Development
Haidar Al yasiri, Ishtaar Organisation for Peace
Taha Abdel Ghani, Al Safa association for Development across Cultures
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Hanaa Shammery, Al Hana Youth Organisation
Suheil Shammery, Salah Eddine Assembly of Organisations
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Saad Battat, Al Khayr Human Organisation
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Walid Faris, Al Hadeeya Organisation for Human Rights
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Hasan Rubay'I, Ethaar Institute for Human Development
Mohammad Shanshal, Scientific Echoes Organisation for Training
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Abed Al Jabbar Malek, Consumer Protection Association
Ahmad Nouaymi, Youth Union for Development, Mousil
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Sijaad Muhsin, Al Hiyaad Organisation for Media development
Kathem Al Baydaani, Al Munqith Organisation for Human Rights
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Buthayna Al Mahdawi Hawaa, Organisation for Aid and development
Liqaa Obaid, Al Widd Humanitarian Organisation
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Jassem Al rassol, Nabeh Al Hayat Institute
Hakim Kathem, Al Ahraar Organisation for Human Rights

Dr. Ali Anbouri, 2020 Assembly
Dr. Haidar Mousawi, Academics Institute for Sustainability and Transparency
Hamza Al Jawahiri, Oil Consultancy Organisation
Abbas Al Ghalabi, Al Mada Newspaper
Ali Al Ariqwaazi, Al racheed TV
Zahra Al Bajaari, Al basra Provincial Council
Amira Al Bakri, Babel Provincial Council
Dr. Haidar Jabbouri, Babel University
Ahmad Hadi, Babel Provincial Council
May Saleh, Babel University
Huda Zaydan, Al Mada Newspaper

Yemen

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Abdel Moez Dabwan, Yemeni parliamentarians Against Corruption
Youssef Abou Ras, Yemeni Organisation for Economic and Social Development
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Mohammad Mahyoub, Social Democratic Forum
Abdel Basir Al mashwali, Yemeni Institute for Legal Support
Marwan Ismail, Organisation for Change Towards Support for Rights and Freedom
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