

Subject: Advancing Transparency within Responsible Minerals Initiative Due Diligence Frameworks

To:

Ms. Jennifer Peyser

Executive Director

Responsible Minerals Initiative

jpeyser@responsiblebusiness.org

April 15th, 2026

Dear Ms. Peyser,

The Responsible Minerals Initiative (RMI) has been engaged in the fight against conflict minerals and for responsible sourcing for over a decade. As a group of civil society organizations with objectives of improving governance and sustainability within mineral supply chains, we are writing to encourage RMI to further strengthen transparency requirements across its due diligence tools and programs, particularly but not limited to tin, tantalum, tungsten and gold (3TG) supply chains. Expectations for supply chain transparency have continued to grow since the adoption of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance), including its application to mineral supply chains beyond 3TG. This includes the disclosure of suppliers in red flag locations.

Greater public disclosure is increasingly recognized as essential to the credibility and effectiveness of responsible sourcing initiatives, particularly in high-risk and conflict-affected areas. Transparency enables meaningful scrutiny, supports continuous improvement, and helps ensure that due diligence frameworks deliver tangible outcomes for affected communities.

At the same time, company failure to engage meaningfully along supply chains and report fully and transparently on engagement on human rights, environment, and anti-money laundering risks exposes businesses reputationally in the eyes of investors and shareholders and can lead to increased risk of litigation.

Therefore, the recent adoption of new disclosure requirements by the London Bullion Market Association (LBMA) for its Good Delivery refiners is a development of note. Specifically, the LBMA is requiring refiners to disclose the names of gold suppliers operating in “red flag locations” as prescribed by Footnote 59 of the OECD Guidance (Gold Supplement). The LBMA also now requires disclosure of all country locations from which LBMA refineries have sourced mined gold and all mines that belong to World Gold Council members. These represent relevant developments in aligning industry practice with the OECD’s expectations around risk transparency and accountability, though concerns remain regarding adequacy and accessibility of due diligence disclosures. At the same time, the NGO community maintains its long-standing position that red flag locations are not limited to mine sites alone, extending to all high-risk areas along a mineral supply chain, as per the OECD Guidance, and that serious human, environmental

and criminal risks can be found at any point along a gold (or other mineral) supply chain. We note that gold amalgamators, processors, traders and bullion banks should also be considered as high risk and assessed and disclosed accordingly. We continue to urge the LBMA to further improve their disclosure regime in this regard.

We urge the RMI—as well as other industry associations or initiatives—to consider comparable transparency measures, while also considering how to address remaining gaps preventing full transparency, and with due regard for coherence across standards. The RMI should consider how enhanced disclosure could be incorporated into its existing frameworks in a way that is proportionate and aligned with the OECD Guidance and evolving expectations. Increased transparency would strengthen the credibility of RMI tools, support downstream companies in meeting emerging regulatory and investor expectations, and improve confidence that due diligence processes are effectively identifying and addressing risks on the ground.

While we recognize that within the parameters of the written text of the OECD Guidance, the requirement for disclosure of supplier names in high-risk areas is contained in the Gold Supplement, expectations around transparency of all mineral supply chains have continued to evolve since the original edition, and it has become broadly accepted that the OECD Guidance applies to all mineral supply chains. Despite challenges to the advancements brought by shifting geopolitical dynamics and pressure on certain mineral supply chains, there remain a number of important stakeholders – including governments, downstream industry, civil society groups and consumer groups—that continue to expect due diligence systems to provide meaningful insight into sourcing practices and risk exposure for all minerals, particularly where they originate from conflict-affected and high-risk areas.

Further, in the past year, an unprecedented number of state agreements, partnerships, frameworks, or trade deals explicitly involving critical minerals or supply chains have been signed across the world. We therefore also encourage RMI to use its platform and tools to ensure that increased investment and trade in the minerals sector is channelled towards transparent and responsible trade, rather than a race to the lowest and most harmful practices. The RMI has played an important role in operationalizing the OECD Guidance, including through the Responsible Minerals Assurance Process (RMAP) and associated reporting mechanisms. These efforts have helped promote risk identification and mitigation in complex global supply chains. The RMI must now continue to usher in continuous improvements, including with respect to transparency.

We acknowledge the need to balance transparency with legitimate commercial sensitivities. However, as demonstrated by the rapid growth of trade databases and the increasing sharing of commercial data through these mechanisms, disclosure of supplier information is increasingly commonplace and unlikely to undermine commercial competitiveness. Rather, greater transparency can help reduce information asymmetries, support more effective risk management, and reinforce trust across the 3TG supply chain.

We would welcome further dialogue with RMI on how transparency practices could evolve in a manner that builds on the RMI's existing leadership and reflects emerging best practices across the responsible minerals landscape. More specifically, we would welcome an opportunity for discussion on this topic at your earliest convenience.

Thank you for your continued efforts to promote responsible sourcing and due diligence in mineral supply chains.

Yours sincerely,

Kady Seguin

Policy and Research Director
IMPACT
kseguin@impacttransform.org

Hannah Mowat

Advisor
Fern
hannah@fern.org

Marc Ummel

Head of Unit Raw Materials
Swissaid
m.ummel@swissaid.ch

Anneke Van Woudenberg

Executive Director
Rights and Accountability in Development
(RAID)
avw@raid-uk.org

Sasha Lezhnev

Senior Policy Advisor
The Sentry
sasha@thesentry.org

François Mercier

Programme Manager, Mining and Human Rights
Fastenaktion
mercier@fastenaktion.ch

Juliane Kippenberg

Associate Director, Children's Rights
Human Rights Watch
kippenj@hrw.org

Samuel Mawutor

Senior Advisor, Africa
Mighty Earth
samuel@mightyearth.org

Lucy Brill

Private Sector Policy Lead
CAFOD
lbrill@cafod.org.uk