

Congress of the United States
House of Representatives
Washington, D.C. 20515

June 11, 2014

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

Re: Implementation of Section 1504

Dear Chair White:

We are aware that the Securities and Exchange Commission (SEC) recently announced its anticipated agenda for the next ten-month period, and that the agenda includes a proposal to initiate rulemaking for Section 1504 of the Dodd-Frank Act by March 2015.

While we are pleased that the SEC plans to begin focusing its attention on this important provision, which mandates revenue transparency in the extractive industries, we believe that the rulemaking for section 1504 should be on a swifter, more definite time line. We strongly urge you, therefore, to issue a proposed rule for public comment no later than the end of this year.

The initial rule issued by the SEC on August 22, 2012 adhered closely to the intent of the law, and we applaud the SEC for its forceful legal defense of the rule. In light of the District Court's July 2013 decision, which vacated the rule on procedural grounds but did not foreclose any regulatory options, we believe the Commission should issue a revised rule that is equally strong. The existing rulemaking record should provide the necessary basis to swiftly schedule a new rulemaking and to reissue a rule mandating public disclosure by company and by project with no exemptions. Anything less would undermine the intended purpose and benefits of Section 1504 for investors, companies, governments and their citizens.

We would note that after the SEC issued its rule in 2012, the rest of the world followed our lead, establishing as a global norm the public disclosure of oil and mineral payments by company and by project with no exemptions. The European Union and Norway passed disclosure laws modeled on the Commission's August 2012 rule. The

Letter to the Honorable Mary Jo White
Page 2

Canadian government has committed to adopt the same requirements and plans to have legislation passed by April 2015 and regulations in place that summer. Several globally important oil and mining companies also support payment transparency at the project-level, citing significant business benefits, while others have begun voluntarily disclosing detailed payment information.

And in March, the United States was accepted as a candidate country in the Extractive Industries Transparency Initiative, which is a global effort designed to increase accountability and openness in these industries, and specifically requires project-level reporting in line with the standard set by Section 1504 and its sister legislation in Europe.

The implementation of Section 1504 is critical. Resource revenue transparency allows shareholders to make better-informed assessments of risks and opportunity costs, threats to corporate reputation, and the long-term prospects of the companies in which they invest. It is no surprise, then, that investors with assets worth over \$5.6 trillion recently called on the SEC to quickly reissue a strong rule to align with transparency rules in other markets.

Public reporting of extractive payments is also fundamental to improving governance, curbing corruption, improving revenue management, and allowing citizens to demand greater accountability from their governments for spending that serves the public interest. This, in turn, can help create more stable and democratic governments, as well as more stable business environments, which contribute to the advancement of U.S. national security interests.

Since its passage, Congress has continued to support the strong implementation of Section 1504 rules. Last year, legislation to implement an agreement between the U.S. and Mexico to develop oil and gas reserves in the Gulf of Mexico (HR 1613) was significantly delayed when the House version of the bill included a waiver from Section 1504 requirements.

The White House strongly objected to the House bill precisely because of the waiver, and issued a Statement of Administration Policy calling the exemption unnecessary and claiming it would directly and negatively impact U.S. efforts to increase transparency and accountability in the oil, gas, and minerals sectors. Congress ultimately passed a version of the bill that did not include the Section 1504 waiver.

Importantly, the final legislation was supported by the same industry groups and lawmakers who initially alleged that Section 1504 would create conflicts of law and put American companies at a competitive disadvantage.

Letter to the Honorable Mary Jo White
Page 3

The court decision, along with data and analysis from the previous rulemaking process, has provided the Commission with a road map to develop a revised rule requiring public disclosure at the project level with no exemptions. We strongly urge you to prioritize setting out a swift and fixed timeline for the implementation of section 1504, including the release of a proposed rule for public comment no later than the end of 2014.

Sincerely,



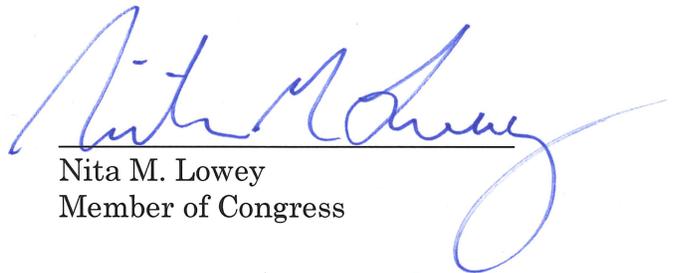
Maxine Waters
Member of Congress



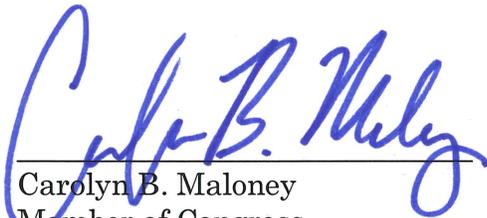
Eliot L. Engel
Member of Congress



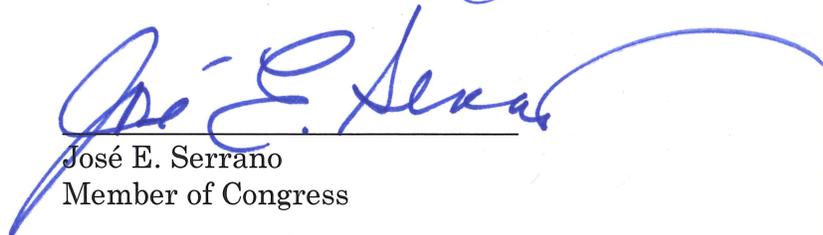
Peter A. DeFazio
Member of Congress



Nita M. Lowey
Member of Congress



Carolyn B. Maloney
Member of Congress



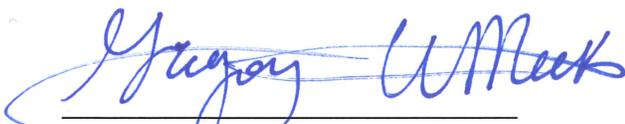
José E. Serrano
Member of Congress



Henry A. Waxman
Member of Congress



Brad Sherman
Member of Congress

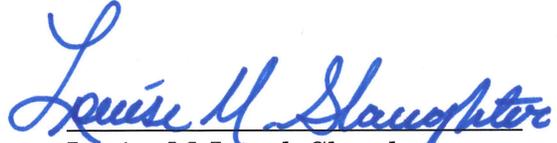


Gregory W. Meeks
Member of Congress

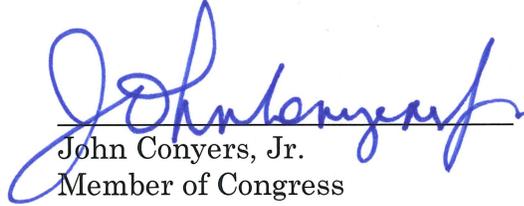


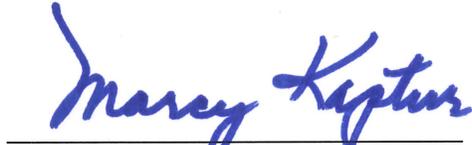
Wm. Lacy Clay
Member of Congress


George Miller
Member of Congress

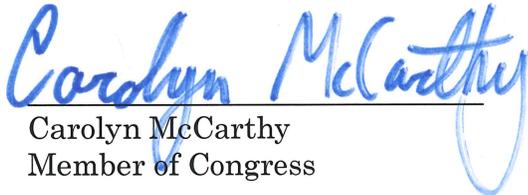

Louise McIntosh Slaughter
Member of Congress


John Yarmuth
Member of Congress


John Conyers, Jr.
Member of Congress


Marcy Kaptur
Member of Congress


Rosa L. DeLauro
Member of Congress


Carolyn McCarthy
Member of Congress

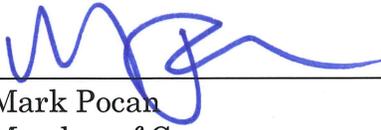

Michael E. Capuano
Member of Congress


Allyson Y. Schwartz
Member of Congress

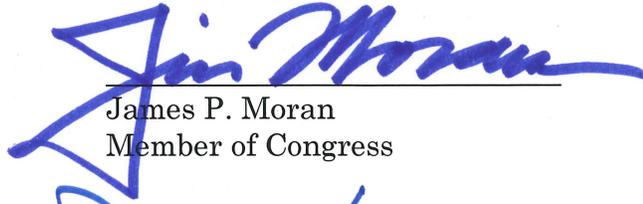

Gwen Moore
Member of Congress


Keith Ellison
Member of Congress

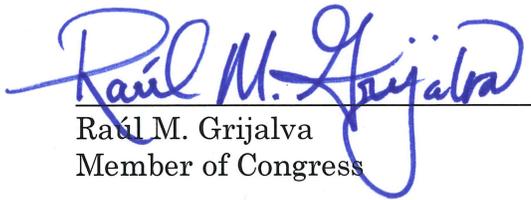

Karen Bass
Member of Congress



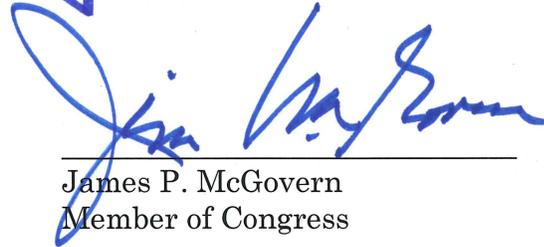
Mark Pocan
Member of Congress



James P. Moran
Member of Congress



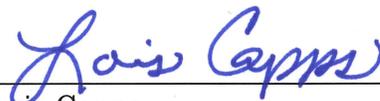
Raúl M. Grijalva
Member of Congress



James P. McGovern
Member of Congress



Earl Blumenauer
Member of Congress



Lois Capps
Member of Congress



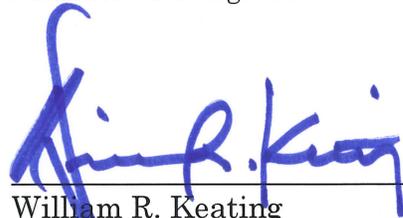
Alan S. Lowenthal
Member of Congress



Sam Farr
Member of Congress



Rush Holt
Member of Congress



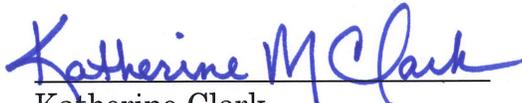
William R. Keating
Member of Congress



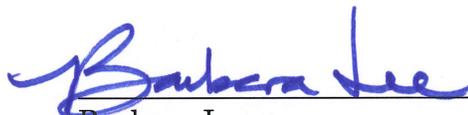
Jared Huffman
Member of Congress



Carol Shea-Porter
Member of Congress


Katherine Clark
Member of Congress

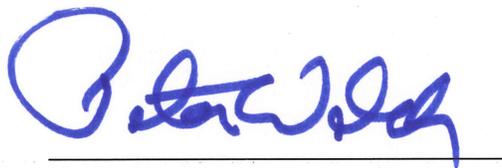

André Carson
Member of Congress

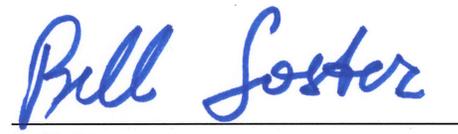

Barbara Lee
Member of Congress


Adam B. Schiff
Member of Congress

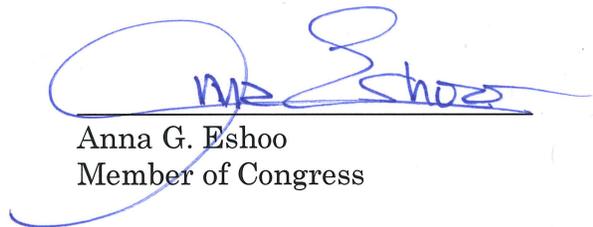

Betty McCollum
Member of Congress

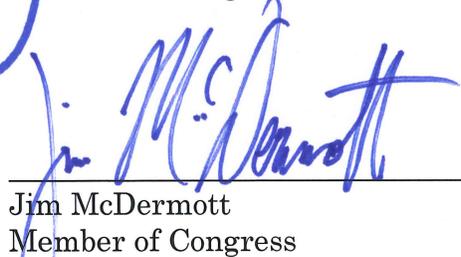

Paul Tonko
Member of Congress


Peter Welch
Member of Congress


Bill Foster
Member of Congress


Janice D. Schakowsky
Member of Congress

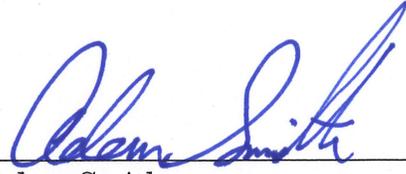

Anna G. Eshoo
Member of Congress


Jim McDermott
Member of Congress


Eleanor Holmes Norton
Member of Congress



John B. Larson
Member of Congress



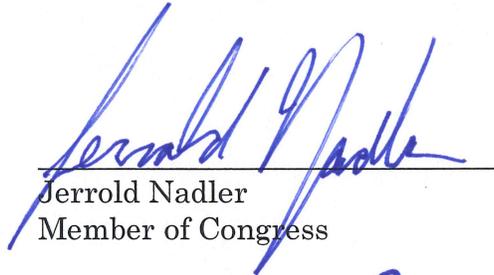
Adam Smith
Member of Congress



Matthew A. Cartwright
Member of Congress



Theodore E. Deutch
Member of Congress



Jerrold Nadler
Member of Congress



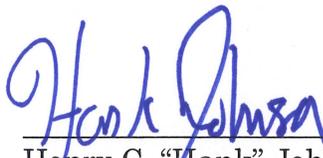
Michael M. Honda
Member of Congress



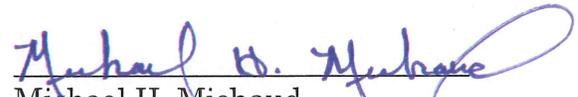
Charles B. Rangel
Member of Congress



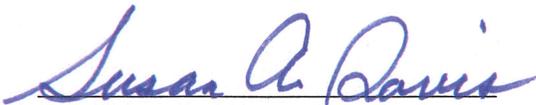
Ann McLane Kuster
Member of Congress



Henry C. "Hank" Johnson, Jr.
Member of Congress



Michael H. Michaud
Member of Congress



Susan A. Davis
Member of Congress



Zoe Lofgren
Member of Congress