

Prepared in February/March 2017 by Liz Cooper, with input from colleagues.

How can universities contribute to tackling conflict minerals?

This publication shares insights on working to eradicate conflict minerals from supply chains in the context of UK universities.



The issue

Minerals such as tin, tungsten, tantalum and gold are all used in the manufacture of electronics products procured and used by universities, and to varying extents in laboratories. These are commonly referred to as conflict minerals, as profits from extracting and trading such minerals around the world may be being used to fund armed conflict, if mining or other parts of the supply chain are under the control of repressive regimes or armed groups. The most widely cited instances of conflict minerals are in the Democratic Republic of Congo (DRC) and neighbouring countries, but other parts of the world are also affected. Other examples of minerals with potential links to conflict include copper, cobalt and diamonds. A number of initiatives have been developed to break the link between mineral extraction and conflict, such as certification of [conflict-free smelters](#) and refiners and many organisations and individuals around the world are working to try to ensure responsible sourcing.

Legislation

In the US, legislation on conflict minerals has been in place since 2010 as part of the Dodd-Frank Act, which requires companies to report whether minerals in their products originate from the DRC, or adjoining countries. In the EU, negotiations have been taking place over the last few years about whether there should be European legislation on conflict minerals, and what form it should take. In May 2015, the European Parliament voted to overturn European Commission proposals for voluntary regulation on conflict minerals, calling instead for law to require EU firms that use tin, tungsten, tantalum and gold from any 'conflict-affected and high risk areas' to provide information on steps they have taken to identify and address risks in their supply chains related to the extraction and trade of these minerals. Trilateral negotiations between the Parliament, Commission and Council have since been taking place, and the final legislation, requiring companies that import over a certain quantity of raw minerals into the EU to be transparent about their sourcing, [was finally adopted by the EU Parliament](#) on 16th March 2017, and will come into force in 2021. At the time of writing, it remains to be seen how Brexit may affect this legislation in a UK context, and whether

the Trump administration may repeal the Dodd-Frank conflict minerals provision, as is currently in discussion.

Campaigns

- [Conflict Free Campus initiative](#) – the Enough Project supports students to campaign for their universities to pass a resolution to commit to taking action on conflict minerals. The campaigning has mainly been targeted at North American universities, but students have also campaigned at the University of St Andrews and Exeter University.
- [Congo Calling](#) – Bandi Mbubi and his team campaign to raise awareness among students and procurement professionals in the UK, through producing materials and giving talks
- [Fairtrade gold](#) – Fairtrade International promote certified Fairtrade gold as an ethical alternative, although mainly focusing on consumer goods such as jewellery

Corporate approaches

In light of the increasing focus and legislation on conflict minerals, large electronics companies have been working towards making their supply chains 'conflict-free' for a number of years. For example, Apple states on its website that it has been working on conflict minerals since 2012, and since 2015, ensures that all of the identified smelters and refiners in its supply chain are participating in an independent third-party conflict minerals audit programme, although recognises that this doesn't mean they are conflict free. The company publishes a list of the smelters in its supply chains. HP states on its website that currently 272 of 297 smelters reported in its supply chain are 'conflict-free smelter program compliant, in process to become so, and/or that we reasonably believe exclusively source conflict minerals from recycled or scrap sources or from outside of the Covered Countries'. Dell's website states that it is their policy to 'refrain from purchasing from any known conflict sources' and that they expect suppliers to adhere to the same standards. Intel uses a 'conflict free' mark on its products to show its commitment to conflict free supply chains, stating that its processors are conflict free and that they are working to extend that to all Intel products.

University of Edinburgh approach

Aware of the issue of conflict minerals and the risks related to the supply chains of many of the goods the University buys, the SRS and Procurement teams agreed to research and develop a policy position, to combat these risks. Conflict minerals was also high on the agenda of Edinburgh University Students Association (EUSA) in 2015/16, being a campaign priority for elected student representative Urte Macikene. The policy was developed collaboratively by SRS, Procurement and EUSA, with input from academic researchers, and was published in March 2016.

Our policy: <http://www.ed.ac.uk/about/sustainability/about/programmes/fairness-trade-sustainable-procurement/conflict-minerals>

Scope

While we recognise the most prominent case of conflict minerals to be that of tin, tungsten, tantalum and gold mined in the DRC and surrounding Great Lakes Region of Sub-Saharan Africa and used in electronics, we wanted to make sure we do not limit our definition of conflict minerals to only this case. For example, mining of tantalum in Venezuela has been linked to armed paramilitaries, and cobalt (used in lithium-ion batteries) is another mineral that is extracted in the DRC, which has also been linked to conflict.

Our policy does focus on information and communication technology (desktop computers, laptops, mobile phones) in the first instance, but we recognise and are investigating risks in other areas such as light fittings, white goods, and various electronic equipment used in labs.

We recognise that a conflict-free claim does not guarantee that human rights of workers in mining and in the wider supply chain are respected. Our Conflict Minerals Policy forms part of a broader approach to socially responsible supply chains.

Commitments

The University of Edinburgh policy makes the following commitments regarding relevant large-scale procurement:

- Ensuring questions about what efforts suppliers are making to combat conflict minerals are included in our own tender or other acquisition processes, and requesting concrete evidence of actions and outcomes
- Requesting detailed progress updates on conflict minerals at supplier contract management meetings
- Encouraging procurement consortia which manage framework agreements to continue to improve their practices regarding eradicating conflict minerals, including asking questions of suppliers at all stages of the procurement process

The policy also makes commitments to working to raise awareness of the issue of conflict minerals to students and staff (regarding smaller scale purchasing choices); encouraging, keeping track of, and learning from research and teaching on conflict minerals; and sharing learning with the wider sector.

Progress

Since adopting the policy in early 2016, the following progress has been made in the University:

- Conflict minerals questions have been embedded in supplier engagement for three main ICT companies, which has raised awareness among sales and other UK staff in companies (rather than only in international corporate social responsibility teams)
- Conflict minerals has been scored as a high risk issue throughout the Procurement Prioritisation Process (using Scottish Government tools) for electronics, labs, estates/construction, and catering equipment and features in resulting briefing papers and action plans - this means conflict minerals is a priority issue to be incorporated into tenders and contract management processes
- Conflict minerals is in the implementation plan of the Sustainable IT Group, raising awareness among Information Services staff
- While not as a result of University of Edinburgh efforts alone, Scottish Government Invitation to Tender for desktops, laptops and workstations included an open-ended question about conflict minerals risks and efforts made
- In order to share information on our efforts at the University, [new web pages](#) have been created on conflict minerals, led by two MSc students on placement in the SRS Department
- Conflict minerals has been added as a topic in our Be Sustainable guide and online training – available to all staff and students
- An MSc African Studies class discussed the University's policy, concluding it to be an appropriate, balanced approach

- Conflict minerals is included within events held in Fairtrade Fortnight
- Edinburgh's work on conflict minerals was presented to the further and higher education sector at an EAUC Sustainable Topic Support Network meeting
- Plans have been made to include conflict minerals and other SRS issues in standard training for all staff making small scale purchases through University systems (SciQuest)

Challenges

A number of challenges are faced when working on the issue of conflict minerals as a university – related to our position as a public buyer, the typically devolved nature of purchasing across a university, and the state of the market:

- In order to have increased influence on the market, we need to establish a sector-wide approach, with all public buyers asking the same questions of suppliers about conflict minerals
- We need to further develop our expertise on assessing supplier responses to questions about their efforts on conflict minerals, so we can engage with companies on how they can take their work in this area further
- If purchasing made by staff members across the University is not subject to same controls and smaller purchases are made through different channels, then we cannot be certain that same controls are in place.
- Traceable and certified conflict-free minerals are not widely available – the market has not yet provided the option to buy all of the equipment needed by a university with guarantees that the materials used in them have not funded armed conflict. Indeed, some progress is being made in some sectors e.g. ICT, but other sectors such as lab equipment and catering equipment are not yet tackling the issue of conflict minerals

Sector collaboration

In order to influence the market, collaboration among public buyers is key. With the majority of large-scale purchases made by universities taking place through frameworks set up by procurement consortia, awareness and action on the issue of conflict minerals by consortia themselves is necessary. London Universities Purchasing Consortium (LUPC) has taken particular interest in conflict minerals, and has set up a [new agreement since August 2015](#) to make the Fairphone, a mobile phone with traceable, conflict-free supply chains, available to university staff and students.

Insights from researchers

'The very definition of "conflict minerals" is not undisputed. Both the technological aspects underlying the industrial demand for, and market price of certain substances, as well as the societal and political realities that emerge in conflict zones where these are mined – all these are in constant flux and require continuous monitoring and evidence-based adjustment of regulatory frameworks. Through its staff and students, the University of Edinburgh already has significant scientific and management expertise in-house and is well placed to display leadership through best practice in this field.'

Dr Wolfgang Zeller, Senior Research Fellow at the Centre of African Studies, University of Edinburgh

'Organisations have a social responsibility towards the ethical sourcing of materials, which includes the sourcing of anything that might include conflict minerals. Conflict minerals are a source of misery for the

many communities affected by their extraction. Whatever the challenges faced by supply chain managers, there is a need for them to maintain a vigil in terms of their supply pipeline, ensuring that all vendors in the pipeline are engaging in good supply chain practices. The University of Edinburgh engages in both ethical sourcing practices as well as research to better understand these challenges.'

Dr Stephen Harwood, Lecturer, University of Edinburgh Business School, University of Edinburgh

'Conflicts by their very nature are dynamic and the role of minerals in some conflicts is also regularly changing. Wide variations in socio-economic and political contexts of conflicts means that international responses to conflict minerals can have very different effects across time and place. This requires a need to frequently revisit and further build our understanding of conflict minerals. The University of Edinburgh is an important place to explore the complex nuances of the topic as there are experts across various disciplines with diverse geographic focuses'

Dr Maggie Dwyer, Research Fellow at the Centre of African Studies University of Edinburgh

What next?

Our plans to take this work on conflict minerals further include:

- More collaboration within the sector to embed the issue in contracts
- More supplier engagement – including different sectors and smaller companies
- More research, including student projects e.g. conflict minerals in construction and travel industries; lithium batteries
- Identify opportunities where conflict minerals can be addressed through other university business partnerships, fundraising, investments and other areas of leverage.

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