



## ITSCI statement on 'Tagged by ITSCI' study by Hester Postma and Sara Geenen, University of Antwerp

It has come to our attention that a University of Antwerp post-graduate study 'Tagged by ITSCI' which has recently been in circulation makes serious allegations about ITSCI which are false, misleading and defamatory. The authors do not substantiate these claims and did not share their views with ITSCI for comment before publication. The report contains basic errors and inaccuracies, including the names of organisations, limiting the credibility of the content. One named author has disassociated themselves with the report.

Using the central and incorrect premise that ITSCI is a certification scheme designed to guarantee 'conflict-free' minerals, the study misunderstands how a due diligence and traceability programme works. There is no reference that ITSCI standards have been independently confirmed as 100% aligned to OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas ('OECD DDG'). This is a significant oversight for any research into responsible sourcing of 3T minerals, especially if making commentary on credibility of a programme. Nor does the study recognise that as an industry-led due diligence initiative, despite ITSCI's engagement of all stakeholders, companies have the final responsibility for their due diligence decisions.

The most serious allegation in the report is that ITSCI operates as a monopoly and acts in a commercial capacity. This is false, misleading and defamatory. ITSCI does not in any way improperly influence company decisions and the decision on what companies purchase is their own not ITSCI's. Our role as an industry initiative, as recognised in the OECD Guidance, is to provide information to the supply chain and ensure that standards are maintained. If companies do not meet expectations of the supply chain then they may find it more difficult to locate a buyer. ITSCI is not a market participant capable of abusing a dominant market position and does not engage in any commercial trading activity. We are operated at cost without profit.

The report does not adequately consider the highly complex mining context Rwanda, which has many socio-political, economic and cultural dimensions. It appears that the authors have a limited understanding of supply chain transactions and dynamics. The authors do not reflect an understanding of technical aspects of our work, for example how ITSCI baselines and field studies are conducted, or how our funding is provided by industry members. It is notable that while mentioning the ITSCI incident reporting process, the authors did not use ITSCI's publically available and extensive incident reports to inform their analysis or research.

The report includes statements made regarding minerals of unknown origin entering ITSCI monitored supply chains and sale of excess tags. Due to the complex context of ITSCI operations we expect risks and errors to occur and have a highly developed incident reporting and follow-up mechanism in place to transparently report those issues, and their resolution, to the supply chain. Where there is any report of a contravention in ITSCI traceability, our on-the-ground team investigates the incident and seeks resolution. This includes through extensive stakeholder engagement, given the complexity of the operating context. All verified incidents are reported to members and government stakeholders and monitored through our incident reporting mechanism. Therefore, we have asked the authors to provide evidence to aid our investigation into these claims.

ITSCI welcomes independent assessments of our programme and recommendations for improvement. We continue to support academic research. However this study includes serious false allegations, inaccuracies and unsubstantiated claims. As of 8 July, the University of Antwerp has taken down the publication from their website and are investigating the matter.

13<sup>th</sup> July 2020: ITSCI, St Albans, UK: [www.itsci.org](http://www.itsci.org)

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