Conflict Minerals Certificate of Origin: Record-Keeping in the Supply Chain

The certificate of origin for conflict minerals documents the sources from which tin, tantalum, tungsten and gold (3TG) in delivered products originate. For buyers and suppliers, it is a central compliance instrument that combines regulatory obligations with corporate due diligence in the supply chain. The following article explains the definition, methods, KPIs, risks and current developments from the perspective of technical procurement.

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Key facts at a glance

01 Conflict minerals typically comprise tin, tantalum, tungsten and gold (3TG), frequently extended in practice to include cobalt.

02 Record-keeping is often based on the self-declared conformity reporting programme (CMRT) of the Responsible Minerals Initiative.

03 Regulatory frameworks include, among others, the EU Conflict Minerals Regulation and Section 1502 of the US Dodd-Frank Act.

04 Record-keeping typically covers the smelters as the decisive stage of the supply chain.

05 Without a documented certificate of origin, companies risk exclusion from supply, contractual breaches and reputational risks.

06 The effort mainly affects heterogeneous supply chains with multiple tiers of procurement.

Definition: Conflict Minerals Certificate of Origin

The conflict minerals certificate of origin is the documented record-keeping by which companies demonstrate where the 3TG minerals contained in their products come from and whether they were sourced from conflict-free sources.

Distinction from conventional product certificates

Unlike a material certificate or test certificate, the certificate of origin does not refer to the technical properties of a material but to its geographical and ethical origin. It passes through the entire supply chain and requires information on mines, traders and, above all, smelters. In practice, the evidence is usually maintained via standardised declarations from suppliers, supplemented by the buyer's own plausibility checks.

Regulatory framework

In the EU, the Conflict Minerals Regulation governs the due diligence obligations of importers of 3TG, with threshold values and a controlled importer list typically being relevant. US-listed companies are additionally subject to Section 1502 of the Dodd-Frank Act. German companies must also take the Supply Chain Due Diligence Act into account, insofar as they fall within its scope. The legal classification should be reviewed on a case-by-case basis by compliance specialists.

- EU Conflict Minerals Regulation: due diligence obligations for 3TG importers
- Dodd-Frank Act, Section 1502: reporting obligations for US-listed companies
- Supply Chain Due Diligence Act: broader due diligence requirements

Methods and approach to record-keeping

Record-keeping follows a multi-stage process extending from the enquiry to series delivery. It requires structured procedures in order management and close collaboration with suppliers.

Supplier survey and CMRT

The most common instrument is the Conflict Minerals Reporting Template (CMRT) of the Responsible Minerals Initiative, with which suppliers declare their smelters. Buyers typically send the template to their suppliers annually or as needed and record the responses centrally, often via a supplier portal. The completeness and plausibility of the information are then checked.

Smelter verification

The declared smelters are compared against conformity-audited lists, which list facilities with audited conformity. Non-listed or unresolved smelters are followed up with the supplier. In the event of critical deviations, escalation up to supplier evaluation and exclusion from supply may follow.

Integration into procurement processes

To ensure that record-keeping does not end at the end of the line, it should be embedded in standard processes: conformity is already queried in the non-binding offer during tenders, corresponding assurances are anchored in framework agreements and MSAs, and the renewal of declarations is scheduled in day-to-day business. An early query is also worthwhile for sample deliveries and new part industrialisation.

Key KPIs of conflict minerals record-keeping

Without measurable KPIs, compliance remains abstract. In practice, a number of indicators have become established that reflect the maturity and quality of record-keeping.

Response rate and conformity rate

Key KPIs are the response rate of surveyed suppliers and the proportion submitting complete and valid CMRTs. A response rate of typically over 90 percent after two reminders is considered achievable, and the conformity rate should move towards 100 percent. Declining rates indicate weaknesses in the supplier landscape analysis or in communication.

Smelter conformity and residual risk

The proportion of conformity-audited smelters in the declared supply chain shows the actual residual risk. In practice, this figure is often well below 100 percent, which should be documented in a traceable manner and pursued with supplier development measures. In addition, the number of unresolved smelters can be tracked as a warning indicator.

Documentation quality

The currency of declarations is equally relevant: in practice, CMRTs are frequently considered outdated if they are older than twelve months. Buyers therefore typically monitor validity dates and link them to the supplier evaluation, so that outdated evidence does not unnoticedly flow into new business.

Risks and controls in practice

The greatest challenge is the depth and opacity of supply chains. Without targeted controls, gaps arise that can have regulatory and reputational consequences.

Typical weak points

Common problems include incomplete supplier chains, trading tiers without their own transparency, foreign suppliers without IT connectivity, and maverick buying, in which requisitioners purchase directly and bypass the compliance check. Retroactive changes to the product range or materials can also invalidate certificates of origin without this being noticed in order management.

Procurement control instruments

Effective controls operate at several points: obligations anchored in contracts, regular spot checks of submitted declarations, comparison of bills of materials and material groups, as well as a whistleblower system through which reports of violations can be submitted. In addition, a systematic supplier evaluation supports treating conformity as an evaluation-relevant criterion.

Consequences of violations

Findings from audits or complaints must be documented and followed up. Depending on severity,

measures range from follow-up requests and escalation meetings to sanctions within the supplier evaluation, return of affected batches or exclusion from supply. Legal action and reporting obligations to authorities should be coordinated with the compliance and legal department on a case-by-case basis.

Current developments and outlook

The topic is developing dynamically: regulatory requirements are increasing, and the focus is expanding beyond the classic 3TG.

Extension to cobalt and other raw materials

In many industries, particularly electronics and automotive, record-keeping is increasingly being extended to cobalt, mica and other critical raw materials. This increases the volume and granularity of data requirements placed on suppliers, who in turn must survey their own suppliers. Standardised templates help limit the growing administrative burden.

Digitalisation and data control

Evidence is increasingly captured digitally and evaluated automatically. A consistently used supplier portal reduces manual effort, improves data control and enables an up-to-date overview of conformity statuses. In this way, record-keeping also contributes to supply chain resilience, as companies gain a better understanding of their supply structures down to the raw material level.

Implications for procurement management

For buyers, this means: conflict minerals compliance is changing from a one-off demonstration to an ongoing process with clear responsibilities, scheduled cycles and documented escalation paths. Those who integrate the topic early into strategy, supplier selection and contract design reduce later corrective effort and strengthen their position vis-à-vis customers and authorities.

Typical metrics

Metric	Typical value
Supplier response rate CMRT	> 90% *typical benchmark after two reminders*
Conformity rate of declarations	> 95% *complete and valid CMRTs*
Share of conformity-checked smelters	rising towards 100% *comparison with auditable lists*
Currency of evidence	< 12 months *older declarations are frequently considered outdated in practice*

Practical example

A medium-sized mechanical engineering company supplies international customers in the electronics industry and purchases soldering materials, contact springs and carbide tools containing 3TG. Following initial customer enquiries, the company establishes a structured process:

- Annual CMRT survey of all relevant suppliers via the supplier portal with automatic reminders
- Comparison of declared smelters with auditable conformity lists by the quality department
- Anchoring the conformity obligation in MSAs and framework agreements as well as a checkpoint for every sample delivery
- Inclusion of the conformity rate in the supplier evaluation and escalation in case of outdated evidence

Conclusion

The certificate of origin for conflict minerals is more than a formality: it secures regulatory conformity, protects against reputational risks and increases transparency in deep supply chains. Successful companies anchor the topic consistently in enquiries, contracts and operational order management rather than treating it ad hoc. Measurable KPIs and digital tools make record-keeping manageable. Those who actively develop suppliers and evaluate conformity turn a mandatory task into a genuine competitive advantage. The legal assessment always remains a task for specialised professionals on a case-by-case basis.

Frequently asked questions

? Which minerals are considered conflict minerals?

Classically, tin, tantalum, tungsten and gold (3TG) are regarded as conflict minerals because they are frequently mined in conflict regions such as the Democratic Republic of the Congo. In practice, many companies extend the scope to cobalt and other critical raw materials. The specific definition depends on the applicable regulation and customer requirements.

? What is the CMRT template and who completes it?

The Conflict Minerals Reporting Template (CMRT) is a standardised form issued by the Responsible Minerals Initiative for declaring smelters and origins. It is typically completed by the supplier, who maps their own supply chain. The buyer collects, reviews and consolidates the declarations along their supplier structure.

? Are SMEs also obliged to keep records of origin?

Direct statutory obligations depend on the role in the market: the EU Conflict Minerals Regulation addresses importers above defined volume thresholds, while the German Supply Chain Due Diligence Act applies to companies above certain size classes. In addition, many OEM customers contractually require evidence from small suppliers as well. Individual obligations should be

assessed on a case-by-case basis.

? How often must certificates of origin be renewed?

In practice, an annual update of CMRT declarations has become established, often at the start of a financial year. If there are material changes in the supply chain, such as a change of supplier or new materials, follow-up should occur immediately. Outdated evidence should be made visible in the supplier evaluation.

? What to do if a supplier cannot provide a certificate of origin?

First, the supplier should be requested in writing to provide the documentation and a deadline should be set. In parallel, an escalation via the quality department and management helps, supplemented by support with the initial survey. If no response is received, typical consequences include sanctions in the supplier evaluation, contractual measures up to return of goods or exclusion from supply.

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