24 February 2020

*Total’s response re Publish What You Pay’s open letter*

*21 February 2020*

*Business & Human Rights Resource Centre invited Total to respond to Publish What You Pay’s (PWYP) open letter urging companies committed to the principles of the Extractive Industries Transparency Initiative (EITI) to comment on the U.S. Securities and Exchange Commission’s (SEC) recently proposed rule to implement Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.*

*Total sent us the following response:*

As part of the public consultation opened by the SEC regarding the proposed rule on Disclosure of Payment by Resource extraction issuers, Total has already submitted its comments to the SEC.

Total considers that the re-introduction of Rule 13q1 under the Dodd Frank Act should enhance transparency for the benefit of the whole industry and its stakeholders and, to this end, restore a level playing field among major publicly listed oil and gas companies.

As a result, the Group strongly supports that the SEC align the Proposed Rule with the European Directive 2013/34/EU, more stringent mainly on two key points : (i) the threshold above which payment to foreign governments must be presented in the report and (ii) the definition of the term “project”.

Our detailed position is available on the SEC website : <https://www.sec.gov/comments/s7-24-19/s72419-6791650-208331.pdf>