

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

FORM SD  
Specialized Disclosure Report

Ecomass Technologies, LP

Exact name of registrant as specified in its charter

Texas	800281206	20-0498725
State or other jurisdiction of incorporation or organization	Texas Secretary of State File Number	IRS Employer Identification No.

4101 Parkstone Heights Drive, Suite 380, Austin, TX 78746-7482

Address of principal executive offices      Zip Code

Robert Durkee, President of General Partner      (512) 306-0020 Ext. 1      Email: [durkee@ecomass.com](mailto:durkee@ecomass.com)

Name and telephone number, including area code, of the person to contact in connection with this report.

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2018.

**Section 1 - Conflict Minerals Disclosure**

**Item 1.01 Conflict Minerals Disclosure and Report**

Ecomass Technologies, LP (hereinafter “Ecomass”) is not an “issuer” or a “registrant” with the SEC and is therefore not required to file the annual disclosures required by Section 1502 of the Dodd-Frank Act (hereinafter the “Act”).

However, Ecomass imports tungsten products in various forms for manufacture or resale and, as a “non-issuer supplier” in support of our customers who may be required to file such annual disclosures pursuant to the Act, Ecomass makes the following statements and declarations:

In accordance with the execution of Ecomass’s stated Policy, Ecomass has concluded in good faith that for the calendar year ending December 31, 2018:

a) Ecomass has manufactured and contracted to manufacture products as to which tungsten, a “conflict mineral” as defined in the Act, is necessary to the functionality or production of such products and is therefore a “necessary conflict mineral” as defined in the Act.

b) Ecomass’s primary means of determining country of origin of its necessary conflict mineral is by conducting a supply-chain survey with direct suppliers using the Responsible Minerals Initiative (“RMI”) Conflict Minerals Reporting Template (“CMRT”) and comparing the results of the survey on smelter information with RMI’s Conformant Tungsten Smelter List. Ecomass surveyed 100% of its direct suppliers who collectively represent 100% of total procurement activities for its necessary conflict mineral and 100% of them have provided a response to the supply-chain survey. Based on a “reasonable country of origin inquiry” (“RCOI”) performed in good faith and reasonably designed to determine whether any of its conflict mineral that is not from recycled or scrap sources originated in the Covered Countries, Ecomass (with one exception – see Item 1.01 (d) below) knows or has reason to believe that none of its necessary conflict mineral originated or may have originated in the Democratic Republic of the Congo or an adjoining country (collectively, sometimes referred to as the “Covered Countries”) or knows or has reason to believe that its necessary conflict mineral is from recycled or scrap sources. Ecomass’s RCOI employed a combination of measures to determine whether the necessary conflict mineral in Ecomass’s products originated from the Covered Countries.

c) As a result of performing the RCOI and based on a careful review of the results thereof, Ecomass has concluded that (with one exception - see Item 1.01 (d) below) (i) its necessary conflict mineral did not originate in a Covered Country, (ii) its necessary conflict mineral came from recycled or scrap sources; (iii) it has no reason to believe that its necessary conflict mineral may have originated in a Covered Country, or (iv) its necessary conflict mineral was “outside the supply chain” (as referenced in the Act and defined in SEC Final Rule, p. 129) before January 31, 2013.

d) Ecomass has determined that the RCOI survey completed by its suppliers represents the most reasonable effort Ecomass can make to determine the mines or locations of origin of any necessary conflict minerals contained in its supply chain. Ecomass’s due diligence on the source and chain of custody of the necessary conflict minerals revealed there was one exception to the statements in Item 1.01 (b) & (c) above. Niagara Refining LLC (“Niagara”) indicated it processed minerals sourced from one of the covered countries, Uganda. However, Niagara is listed by RMI in “Table 1: Responsible Minerals Assurance Process (RMAP) Conformant Tungsten Smelters” indicating they are TI-CMC Members and have been determined to be conformant with the RMAP Supply Chain Transparency Smelter Audit Protocol for Tungsten by completing a RMAP conformance audit conducted by an independent third party, effectively resolving the Niagara exception so that Ecomass is in full compliance with the Act.

e) Attached is Exhibit 1.01 “Ecomass Form SD Supply Chain Summary – CMRT” containing a summary of the information collected from all supply-chain survey respondents. As stated above, Ecomass is not required to file this Specialized Disclosure Form (Form SD) with the SEC. Furthermore, even if filing was required for Ecomass’s Form SD, the facts and conclusions of the RCOI dictate that neither (i) a Conflict Minerals Report; (ii) an Independent Private Sector Audit; or (iii) additional due diligence measures would be required by the Act. Form SD is posted to a publicly available Internet site at [www.ecomass.com](http://www.ecomass.com).

## **Section 2 – Exhibits**

### **Item 2.01 Exhibits**

Exhibit 1.01 – “Ecomass Form SD Supply Chain Summary - CMRT” as required by Items 1.01 and 2.01 of this Form.

## **SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934 as applicable to Ecomass’s customers who may be subject to the Act, Ecomass has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Ecomass Technologies, LP

\_\_\_\_\_  
By (Signature and Title)

28-JAN-2019

\_\_\_\_\_  
(Date)

Robert Durkee, President of General Partner, Ecomass Management, LLC



Select Language Preference Here:  
 選擇您的語言:  
 사용할 언어를 선택하십시오.  
 表示言語をここから選択してください。  
 Sélectionner la langue préférée ici:  
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## Conflict Minerals Reporting Template (CMRT)

English

Revision 5.11  
 April 27, 2018

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (\*). Consult the instructions tab for guidance on how to answer each question.

### Company Information

Company Name (*):	Ecomass Technologies
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	143332760
Company Unique ID Authority:	DUNS
Address:	4101 Parkstone Heights Drive, Suite 380, Austin, TX 78746-7482 USA
Contact Name (*):	Robert Durkee
Email - Contact (*):	<a href="mailto:rdurkee@ecomass.com">rdurkee@ecomass.com</a>
Phone - Contact (*):	512-309-0020 Ext 1
Authorizer (*):	Robert Durkee
Title - Authorizer:	President
Email - Authorizer (*):	<a href="mailto:rdurkee@ecomass.com">rdurkee@ecomass.com</a>
Phone - Authorizer (*):	512-306-0020 Ext 1
Effective Date (*):	28-Jan-2019

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum	No	
Tin	No	
Gold	No	
Tungsten (*)	Yes	

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	No	

5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	100%	

6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	

7) Has all applicable smelter information received by your company been reported in this declaration? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a conflict minerals sourcing policy? (*)	Yes	
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	<a href="http://www.ecomass.com">www.ecomass.com</a>
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	
G. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
H. Does your review process include corrective action management? (*)	Yes	
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	

[Link to "RMAP Conformant Smelter List"](#)

Revision 5.11  
April 27, 2018



**TO BEGIN:**

**Option A:** If you know the Smelter Identification Number, input the number in Column A (columns B, C, E, F, G, I and J will auto-populate); D will grey out.

**Option B:** If you have a Metal and Smelter Look-up name combination, complete the following steps:  
Step 1. Select Metal in column B  
Step 2. Select from dropdown in column C (wrong combination will trigger RED color)

**Option C:** If you have a Metal and Smelter Name combination, complete the following steps:  
Step 1. Select Metal in column B  
Step 2: Select "Smelter Not Listed" in the Smelter Look-up drop down and complete columns D & E  
Step 3. Enter all available smelter information in columns H through Q

(\*) Mandatory fields are noted with an asterisk.  
(1) Entry required when Smelter Look-up = "Smelter not listed"

NOTE: A combination of Options A, B and C may be used to complete the Smelter List. Do not alter autopopulated cells. All errors in the Smelter Look-up should be reported to RMI by contacting RMI@responsiblebusiness.org.

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Smelter Identification Number Input Column	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Location: State / Province	Smelter Contact Name	Smelter Contact Email	Proposed next steps	Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Does 100% of the smelter's feedstock originate from recycled or scrap sources?	Comments
	Tungsten	Niagara Refining LLC		UNITED STATES OF AMERICA	CID002589	RMI		Depew	New York	Roger Showalter	roger@niagararefining.com		Panascara (Portugal), Far East (Russia), Mina Bruiji-Currais Novos, RN BRAZIL, Benito Juarez, S/n Baviacora, Sonora MEXICO, Uganda			
	Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.		CHINA	CID002320	RMI		Xiamen	Fujian	You Zhou	zhou.you@xctc.com		Xianglushan Mine CHINA	China	No	
	Tungsten	Nui Phao H. C. Starck Tungsten Chemicals Manufacturing LLC		VIET NAM	CID002543	RMI		Dai Tu	Thái Nguyên	Do Thanh Tam	tam.do@nui-phao-hcstarck.com		Nui Phao	Vietnam	NO	
	Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.		CHINA	CID000258	RMI		Ganzhou	Jiangxi	Jenny Tang	export@zy-tungsten.com		Tao Xi Keng Mine CHINA, Xin An Zi Mine CHINA, Shi Lei Mine CHINA, Tian Jing Wo Mine CHINA	China	No	
	Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.		CHINA	CID002095	RMI		Shaoguan	Guangdong				XinAn County yinglan Mine	China	No	
	Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.		CHINA	CID002321	RMI		Xiushui	Jiangxi					China	No	
	Tungsten	Fujian Jinxin Tungsten Co., Ltd.		CHINA	CID000499	RMI		Yanshi	Fujian					China	No	
	Tungsten	Global Tungsten & Powders Corp.		UNITED STATES OF AMERICA	CID000568	RMI		Towanda	Pennsylvania	Stacy Garrity	stacy.garrity@globaltungsten.com		Panascara (portugal), Drakelands (England)		No	
	Tungsten	Kennametal Huntsville		UNITED STATES OF AMERICA	CID000105	RMI		Huntsville	Alabama	Rod Parvin			Scrap	Scrap	Yes	Toll conversion of scrap
	Tungsten	Hydrometallurg, JSC		RUSSIAN FEDERATION	CID002649	RMI		Naichik	Kabardino-Balkarskaya Respublika	Dennis	Gorbachev		Novorossky, Far East	Russia	No	
	Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.		CHINA	CID002494	RMI		Ganzhou	Jiangxi							
	Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.		CHINA	CID002513	RMI		Chenzhou	Hunan							
	Tungsten	Philippine Chuangxin Industrial Co., Inc.		PHILIPPINES	CID002827	RMI		Marilao	Bulacan							
	Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.		CHINA	CID002316	RMI		Ganzhou	Jiangxi							
	Tungsten	Xiamen Tungsten Co., Ltd.		CHINA	CID002082	RMI		Xiamen	Fujian							