



RJC Chain of Custody Review Comment report on round 1 consultation

A summary of comments received on the Public Summary of the CoC review

Document date: 15 December 2016

1. Purpose of this document

The Responsible Jewellery Council (RJC) is reviewing its Chain-of-Custody (CoC) standard. In August 2016, RJC shared a [Public Summary](#) of the CoC review which outlines the objectives, scope, process and timeline of the review and invited feedback from all interested stakeholders. This first round of consultation closed in October 2016.

The purpose of this document is to share the comments received.

2. Background

The [Chain-of-Custody \(CoC\) Standard](#) defines an approach for companies to handle and trade precious metals (gold, and platinum group metals) in a way that is fully traceable and responsibly sourced. CoC certification is voluntary for RJC members and complements the mandatory certification through the Code of Practices (COP). The CoC standard defines the management systems that a certifying company needs to follow to identify, source, segregate and transfer material.

The objective of the review is to refine the standard and supporting documents and to inform the RJC training programme. There are two public consultation periods: Round 1 on the Public Summary document, which was completed in October 2016, and Round 2 on a revised draft of the standard. An additional optional public comment period may be held if needed. The figure 1 in the annex provides more detail on the process and timeline.

The [RJC Standards Committee](#) oversees the review of the standard. It is made up of company representatives from each part of the jewellery supply chain who are members of the RJC, as well as individuals from non-governmental organisations (NGOs), auditors, related standard setting bodies and experts.

3. Comments

A broad range of stakeholders were notified of the opportunity to participate in the review of the standard. This included RJC members, audit firms, NGOs, cross-recognition partners, industry press, industry and trade associations, and government representatives. In the first instance, a newsletter alert and

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website update was made. An initial email list of all the CoC certified companies and accredited CoC auditors was then used to invite 'users of the standard' to comment. A series of four webinars were subsequently held with people from over 30 organisations (audit firms and certified companies).

Stakeholders were then alerted to the release of the Public Summary through an email campaign using the full RJC stakeholder list (over 2,300 recipients) as well as a website update. An outline of issues and topics to be reviewed in the CoC standard was included in the Public Summary (copied in table 2 of the annex here for reference). Comments were invited on the Public Summary document and more than 50 individual comment points were received from five submitters.

The table 1 in the annex has each of the individual comments received, verbatim. We greatly appreciate the time and insightful contributions from the submitters. These comments are shaping our proposed changes to the standard and are invaluable for strengthening and clarifying it. A summary of key points is below. Comments were made:

- Supporting the proposal to review the eligibility criteria of mined material.
- Recommending a review of the eligibility criteria of recycled material to allow precious metal waste from by-products (eg, e-waste) to be eligible.
- Proposing that an approach be defined for claims when a jewellery product is not 100% CoC. This could mean that certain components of a product are CoC or a certain proportion of a product overall is CoC.
- Proposing reconfiguring the conflict sensitive sourcing provision (CoC 10) to make it mandatory (eg by moving it to the COP).
- Recommending that the reference to conflict sensitive sourcing clearly include high risk areas as referenced in Annex II of the OECD Due Diligence Guidance.
- Specifying that due diligence requirements should be periodically repeated.
- Calling for an approach for disclosing country of origin information, aligning with cross-recognition partners.
- Endorsing the need for more detailed guidance to auditors on the sampling approach.
- Supporting the recognition of artisanal and small scale mining (ASM) standards under the CoC standard and calling for continued collaboration to engage with the ASM sector.
- Identifying the need for additional guidance for companies to assess risks (generally) and define criteria for sourcing recycled material.
- Clarification on the assurance approach (eg minor non-conformances need to be closed out for certification)

4. Next steps

These comments, in conjunction with internal research are being used to propose changes to the CoC standard. The RJC Standards Committee will be reviewing proposed changes in early February 2017 and, upon their approval, a revised draft of the CoC standard will be publicly shared for a 60 day review as part of the second round of public comment.

Annex

Table 1 – Comments on the Chain-of-Custody Standard from Round 1

Type of comment: ge = general te = technical ed = editorial

These comments were received between August and October 2016 and are copied here as they were received.

	CoC Provision	Name	Type	Comment	Proposed change
1	Disclaimer	Society of Threatened Peoples Switzerland (STPS)	ge	A standard that "gives general guidance only" does not have a lot of credibility with customers.	The requirements of the standard should be strictly enforced, as a minimal standard. In this case, the certificate would have a much higher value.
2	Intro	STPS	ge	If this standard remains purely voluntary, it does not have a big impact, neither for the importance of the label, nor for the situation in practice of the companies that are part of the relevant business sector.	All the members of RJC should be strongly encouraged to comply with the CoC-Standard.
3	Intro	STPS	te	In paragraph G. Certification it is stated that "Any minor non-conformances found during the Certification Audit must be addressed prior to the Surveillance Audit". The CoC Standards Guidance makes this even clearer, stating that the surveillance audit should check the "progress or completion" of actions to remove minor non-conformances.	Progress in removing minor non-conformances should not be enough. Within 18 months after the Certification Audit it should definitely be possible to take the necessary measures in order to comply fully with the requirements of the standard. If a company can continue using its certificate after a certain transition period - like the 12 to 18 months between Certification Audit and Surveillance Audit - even if they do not comply fully with the requirements, this results in a huge loss of credibility for the label.
4	Application	Anonymous	te	CoC: The RJC Chain-of-Custody (CoC) standard is therefore voluntary, and offers flexibility in the types of provenance claims that Members may wish to support. Is there a clear indication in the certification which provenance claims were in scope for the CoC audit?	
5	Application	Anonymous	ge	ASM inclusion Consider listing key criteria that need to be met by ASM certifications for RJC consideration. It may encourage further standards development in the ASM sector.	

	CoC Provision	Name	Type	Comment	Proposed change
6	Certification	Anonymous	ge	Strong need that RJC cover - Need for country of origin data collection and verification, and made available to external stakeholders in some aggregate form - Need for more stringent conflict minerals checks for all material streams regardless of the scope of the RJC CoC audit. e.g. If only recycled material is in scope, there is still need for stringent checks for primary material	
7	2.3	STPS	te	In the current version, the provenance of the material must only be passed on if it is a conflict-affected area.	The detailed provenance of the material must always be passed on, so that even the end-customer knows where it is from.
8	2.4	STPS	te	If errors in the documentation of a CoC-material-shipment are only dealt with by the two involved parties, there might be a lack of transparency and control.	If an error is detected, it must be immediately reported to a control body at the RJC who will decide about the further proceedings.
9	3.1 b	STPS	te	A risk assessment to determine whether the risk of potential non-conformance is acceptable is a good idea. Nevertheless, it is not defined what is acceptable and what is not.	Include a clear definition about what kind and degree of risk is acceptable.
10	4.1	Richemont	te	No industrial mines are CoC certified, while some may have been certified according to other standards related to CSR. Recognizing those certifications may increase the offer of CoC mined material on the market.	Recognise as eligible the material from mines which have all following certifications: ISO14001, OHSAS18001, SA8000 and Cyanide Code Management.
11	4.1 d	STPS	te	For ASM miners that work under the concession of a bigger company, it cannot be enough to "have participated in initiatives that enable the professionalisation and formalisation of ASM".	Also ASM miners that work under the concession of a bigger company must prove that they comply with the core values of the RJC, which is the respect of human/labour/indigenous rights, local/national/international laws as well as the protection of health, safety and the environment.
12	4	Alliance for Responsible Mining (ARM)	te		Close cooperation on the development of the ASM Market Entry Standard for due diligence, within the spirit of the MoU. In-designed alignment and harmonization.

	CoC Provision	Name	Type	Comment	Proposed change
13	4	ARM	ge		<ul style="list-style-type: none"> • Proactive actions to promote purchasing from ASMO. Eg. Communication strategy to raise awareness of Fairmined Incorporated amongst RJC members. Such as promoting as best-practice a responsible sourcing policy/mix of RJC CoC with minimum % of certified ASM gold. ARM will send some materials shortly with a draft proposal. • Promoting downstream involvement in increasing the supply of eligible ASM gold. • In terms of CoC eligibility for ASM sourcing it is important to discuss the difference between “best-practice responsible certified gold” vs “acceptable ASM gold, due-diligence on major risks” • Find a way to facilitate due diligence from the Fairmined certified ASMOs. Explore the current procedure and find a way that Fairmined certified ASMOs have all the required documents (including OECD) to present to the RJC members.
14	4.1 e	STPS	te	Even if the traces of precious metals are extracted from the mining byproducts in the refinery, this cannot be regarded as the real provenance of the material.	In the case of traces of precious metals that are extracted from mining byproducts there is no difference regarding the rules of provenance. It must be stated where the original material is from, and this information has to be passed on until reaching the end customer.
15	4	Anonymous	te	Recommend including sampling or specific checks to assess entity ability to meet standards, built on top of proof of management system	
16	5	Richemont	te		1/ In order to increase the quantity of CoC material available, we propose to increase quantities of recycled CoC material by developing the eligibility criterias. We propose to consider precious metals from waste material as by-products of the recycling chain. The point where this material would enter the jewelry supply chain would be the entity which produces the alloy (ex: Varinor), as described in the here-below scheme. This entity which needs to be CoC certified, would be in charge of issuing the Eligible Material Declaration, based on Due Diligence conducted on their upstream waste supply chain. The Due Diligence process guidance should be described in the standard.
17	5.1	STPS	te	Recycling is a very important sector in the precious metal business and should be fostered. Nevertheless, it must not be possible that non-certified material becomes certified material, only by being recycled by a certified refinery.	Recycled material can only be CoC-certified if the recyclable materials that have been used were certified as well. It is not possible to turn non-certified material into certified material, just by recycling it.

	CoC Provision	Name	Type	Comment	Proposed change
18	5.2 a	STPS	te	The formulation of this article is very vague. It is not the company who should define the criteria of acceptable sources, but the RJC.	The RJC clearly defines under which strict circumstances recyclable precious metals can be sourced from commercial suppliers. This allows: i. Material that is already CoC certified ii. Material that is considered grandfathered and can be proved to be from responsible sources.
19	5.3 b	STPS	te	The formulation "reasonable steps and inquiry" allows a very wide range of interpretation. As a matter of fact, the whole provision 5.3 allows material from almost all kind of sources to be turned into CoC-certified material.	As was said before, only if the recyclable material was CoC-certified, the recycled material can receive this label as well. If it is not possible to prove that the material was certified, the recycled material shall not carry this label.
20	6.1	STPS	te	For grandfathered material, there should be special requirements regarding necessary information and documentation, as it is much more difficult to prove that all the requirements have been fulfilled at that time.	The Entity issuing Eligible Material Declarations for grandfathered material must provide all the necessary information and documentation that proves that all the requirements of the standard have been fulfilled at that time.
21	7.2 c	STPS	te	See comment about provision 4.1 e	See comment about provision 4.1 e
22	9 - CoC Guidance	Richemont	te	Businesses with complex supply chains such as watches, may need several years to be able to communicate easily with their final customers, making the RJC CoC standard not attractive for that kind of businesses. In order to increase the visibility of products made from CoC material available on the market, it may be interesting for them to make claims while there are COP certified only.	1/ Chain of Custody Standard Guidance – chapter 9: "RJC members may use the "Provenance claim" provision of RJC Code of Practices in order to make claim to the final customers about the COC materials included in the finished jewellery products, supported through management systems." This : - will need to have a traceability management system for each product reference (as required by the « Provenance claim » disposition), - will require to train the sales people (as required by the « Provenance claim » disposition) - would allow RJC members to make claim to the final customer without being COC certified

	CoC Provision	Name	Type	Comment	Proposed change
23	9 - CoC Guidance	Richemont	te	In particular, a long list of small components made of non-COC material is not easy to explain to the final customer, even if the weight of non-COC material is much lower than the weight of COC material in the final product. It may be interesting to make global claims regarding the global quantity of COC gold used to produce the goods.	2/ Chain of Custody Standard Guidance – chapter 9: “RJC Members may make global claims in marketing or promotional materials about the COC material used to produce their finished jewellery products or a specific jewellery products line – this in terms of weight of components, or weight of gold or Platinum Group Metal used in their production. The claims has to be supported by systems. The ratio should be part of the claim.” This: - will need to have a management system able to know about the global quantity of gold used to produce the products in order to make a non misleading claim releaseable to the customer (no claim about CoC gold included in the products allowed) - would allow RJC members to make claim to the final customer without being COC certified
24	9	Richemont	te	For watch makers, it could be interesting to be able to make claim about a watch made from CoC gold while only the main external components are made from CoC gold (bezel, backlid, middle of the case, crown, clasp/buckle and bracelet if they are also made from gold). Those components are very heavy compared to the other minor gold components (hands, mass, screws...). This would be a pragmatic solution for CoC certified companies to make claims on complex products and make the CoC certification more attractive.	It may not need to change anything in the standard itself, but maybe only the Chain of Custody Standard Guidance – chapter 9 should be amended: “Claiming CoC material watches may be possible if the main external components (bezel, backlid, middle of the case, crown, clasp/buckle and bracelet if they are also made from gold) are made from CoC materials.” This: - will need to have a traceability management system for each product reference, but limited to the main external components - would allow to make claim on final complex products more quickly than with the current version of the standard
25	9	Richemont	te	It may be interesting to have a kind of “mass balance” mode certification (like “Fairmined Incorporated”) to make global claims regarding the global quantity of gold contained in their products, and make the CoC certification more attractive.	“Mass balance” process needs to be introduced in the standard. The ratio should be part of the claim. This: - will need to have a management system in place able to know about the global quantity of gold contained in the products that are sold in order to make a non misleading claim releaseable to the customer - may allow to claim in marketing or promotional materials about the global amount of COC material contained in their finished jewellery products - would also increase the COC products available on the market

	CoC Provision	Name	Type	Comment	Proposed change
26	9.1	STPS	te	The label "CoC-certified" should have clearly defined thresholds and the claim "Contains CoC-certified material" should only be allowed if its percentage of relevant material is higher than 50%.	There should be two kinds of CoC-labels: 1. 100% CoC, if all the material that is in the scope of the CoC-Standard (gold, rhodium, palladium, platinum) is certified. 2. CoC Mix, when more than 50% of the material that is under the CoC-Standard is certified. If the relevant percentage is less than 50%, the label shall not be given to the product.
27	10	Richemont	te	A public reporting should be requested for conflict-sensitive sourcing as mentioned in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas	Add annual public reporting for conflict-sensitive sourcing
28	10	ARM	te	Important to be clear about what applies to the industry and what to ASM, and what differentiated mechanisms could be used. A necessity of using protocols/ standards for ASM-specific due diligence, as opposed to large scale mining. ARM will start to develop a Market Entry Standard, in parallel to RJC's CoC process, and it will be of great value to coordinate these processes in the spirit of the ARM-RJC MoU.	
29	10	Anonymous	ge	Regarding the definition of "conflict-sensitive:" how should countries beyond DRC area (e.g. Colombia, Myanmar) be identified by smelters and what should auditors be checking for to ensure the right countries are scoped in?	
30	10	Anonymous	te	Given RJC's push towards OECD alignment, consider including child labor and forced labor risks in the scope, in alignment with Annex II of the Due Diligence Guidance (p.20) These risks are covered by CoP, however, it is unclear to us how CoP and CoC audits align in terms of time of audit, regularity of audit and audit processes.	
31	10.3	STPS	te	A complaints or grievance mechanism is only useful, when the people know about it.	The Entity shall establish a complaints or grievance mechanism and inform the public about its existence.
32	10.3	Anonymous	ge	Consider grievance mechanism options beyond just relationship to specific audit process Recommend a requirement that the grievance mechanism be utilized for all OECD risks in Annex II, including child labor and forced labor Strong need for audit to cover the presence of a resolution process for the grievance channel - otherwise, kills the purpose of one	
33	10.4 b	STPS	A	A Know Your Customer system relying on the information that exactly this customer provides is of no use.	The second sentence of the provision 10.4 b should be deleted.

	CoC Provision	Name	Type	Comment	Proposed change
34	10.4 b	Richemont	te	Due diligence should be conducted periodically to make sure that the previous conclusion is still valid.	"The Refiner shall conduct Due Diligence periodically to confirm that the conditions described...". The minimum period has to be defined in the standard (annually? every 3 years?)
35	Glossary	STPS	te	The term "conflict-free" is reduced to armed conflict. Nevertheless, there is a wide range of other conflicts that are closely related to the mining business, as well.	The definition of the term "conflict-free" should also include social conflicts and conflicts related to the environment and the violation of human and indigenous rights.
36	Glossary	Richemont	te	Conflict affected area to more detailed	Add the future EU regulation criteria
37	Glossary	STPS	te	The definition of the term "Due Diligence" is quite vague and offers a lot of space for interpretation.	As this term is crucial, it would be preferable to define clearly what kind of measures must be taken and what information must be checked.
38	Glossary	STPS	ed	In the glossary it is stated that the Due Diligence of the CoC Standard "supports" the implementation of the according OECD Guidance.	The OECD Guidance should form an integral part of the Due Diligence of the CoC Standard and its compliance must be compulsory.
39	Glossary	STPS	te	The term "Know Your Customer" focuses only on financial conditions. Nevertheless, it would be of great importance to check also, if the corresponding business is involved in environmental pollution, social conflicts or violations of human and other rights.	The part "have a clear understanding of their business relationships" should include investigations whether the relevant organisations are involved in environmental pollution, social conflicts or violations of human and other rights.
40	Glossary	STPS	te	Illegitimate sources are defined as being, among others, contrary to applicable law.	Regarding this concept, it is very important for the auditors to keep in mind that "applicable law" also includes international law, for example the Declaration of Human Rights, the UN Declaration on the Rights of Indigenous Peoples and many more.
41	Appendix 1	Richemont	ed	Chain of Custody Transfer Document: end date of the issuer's certificate needs to be visible	Add a box "End date of the certificate"
42	CoC Standards Guidance	STPS	ge	It is stated in the Guidance that "[...] the CoC Standard sets out requirements for <u>what</u> a business must be able to do, but does not generally prescribe <u>how</u> systems and procedures are designed." On one hand, this offers the businesses a lot of freedom to reach the aims in the way that seems appropriate to them, on the other hand it offers a lot of space for interpretation and contains many vague formulations.	If this freedom of the businesses to decide about the way how to reach the aims should be maintained, it is of crucial importance to define very clearly the aims and the accompanying measures. The framework conditions must be made very clear and the compliance with it must be controlled at a regular basis.

	CoC Provision	Name	Type	Comment	Proposed change
43	n.a.	STPS	ge	In the current form of the RJC Chain-of-Custody Standard it is possible that for example a refinery can turn material into CoC certified material, even if it has not been mined under CoC requirements. This affects the credibility of the label in a negative way, as the control of the chain-of-custody does not necessarily really start at the beginning of the process, but at a later stage. The FSC label could serve as an example here how the entire chain-of-custody can be included.	The entire chain of custody shall be included, beginning at the mine and ending at the end-customer. This would mean that only material that has been mined under the CoC standard can become CoC certified, if it is processed by a CoC certified refinery etc. This would highly increase the credibility and also the content of the label. In this case, it would really serve as a model for other companies, including non-members of the RJC.
44	n.a.	STPS	ge	The administrative requirements of the CoC Standard are mainly designed for big companies, even if also ASM businesses play a certain role in the gold business.	If the RJC intends to support the ASM-businesses as well, it might be an option to elaborate a separate CoC ASM Standard, which is adapted in the administrative means, but nevertheless keeps a high level of requirements regarding responsible mining.
45	n.a.	STPS	ge	The CoC Standard refers to the RJC Code of Practices, which includes some provisions about indigenous rights. As a high percentage of minerals, like for example gold, are located on the territory of indigenous peoples, it would be very important to give more importance to this topic.	The CoC Standard should include a clear statement that Mining Facilities can only become CoC certified if they can prove with documentation that they possess for each and every one of their projects the Free, Prior and Informed Consent of all the affected indigenous communities. A slightly adapted version should be included in the RJC Code of Practices, as well.
46	Complaints and allegations	STPS	ge	If there are reasonable doubts about the conformity of eligible or CoC certified materials with the requirements of the CoC Standard, no matter whether they are raised by suppliers, refiners, customers or other interested parties, should automatically be reported to the complaint mechanism at RJC Management level, as well.	If there are complaints regarding the conformity of materials with the requirements of the CoC Standard, they must be compulsorily passed on to the RJC complaint mechanism, as well. This provides the RJC with a better overview about current problems and might lead to a more profound investigation of members that are strikingly often the addressees of such complaints.
47	CoC Certification Handbook	STPS	ge	Neither in the Standard nor in the Standards Guidance is stated what happens if investigations show that an Entity has used material from sources that do not comply with the requirements.	Define the consequences if investigations show that a source of material does not comply with the requirements of the standard. What happens, if the company itself detects it? Do they have to report it to the RJC Complaints Body? What happens if the RJC Complaints Body detects it? Will there be a fine for the corresponding company?
48	Scope	Richemont	te		2/ Diamonds: should be considered in the COC scope

	CoC Provision	Name	Type	Comment	Proposed change
49		ARM			Review alignment with ASM standards, including Fairmined Licensee standard for downstream companies. Inputs: <ul style="list-style-type: none"> • RJC accredited auditors may qualify as Fairmined auditors to conduct audits to RJC members/Fairmined authorized operators/licensees. • Comparison between RJC CoC Standard and Fairmined Standard. Special document for auditors. • Comparison between RJC CoP Standard and Fairmined Standard. • We recommend evaluating the option to discuss the possibility of combined audits for CoP certified members/Fairmined operators and licensees.
50		ARM			Discuss the recognition of Fairmined for CoP 7 (Sourcing from ASM).
51		ARM			<ul style="list-style-type: none"> • The same in terms of communication and claims: the difference between “Responsible certified gold” vs “due-diligence on major risks” • Alignment with Fairmined claims/CoC material claim • There are opportunities to align RJC Provenance Claims to a responsible sourcing mix that includes a minimum % of certified ASM gold. Fairmined Incorporated sourcing model is designed precisely to facilitate gold buyers to include a representative proportion of Fairmined gold as part of their broader responsible gold sourcing mix.
52		UL		I found discrepancies between the toolkit and other materials in regard to cross recognition with LBMA and EICC. The toolkit states in the types of evidence column that it applies to 10.1; 10.2 and 10.4 for an audit obtained in the past 12 months. In other documents (guidance, sample report) only 10.4 would be covered and the standard guidance PM 2012 states that an audit in the past 3 years can be accepted (page 51).	
53		UL		Can a EICC or LBMA certificates be issued on the ground of a successful CoC assessment? If so, both initiatives have specific requirements in terms of sampling of transactions and shipment documents. Shouldn't similar sampling requirements apply to a CoC audit that would provide another recognize initiative certificate?	
54		UL		Can a refiner be certified for CoC mined materials? As per the matrix of applicable provisions, it does not seem so. What if he performs relevant due diligence? Could Fairmined materials be considered CoC material?	

	CoC Provision	Name	Type	Comment	Proposed change
55		UL		To which extent should a member, at different stage of the supply chain, enforce the application of rules for use of the RJC logo, trademarks and IP down his supply chain?	
56		UL		Are their minimum requirements on the content of the policy (10.1), and on the criteria (5.2, 10.4) to be communicated to suppliers?	

Figure 1 – Proposed Chain-of-Custody review timeline - as presented in the Public Summary document

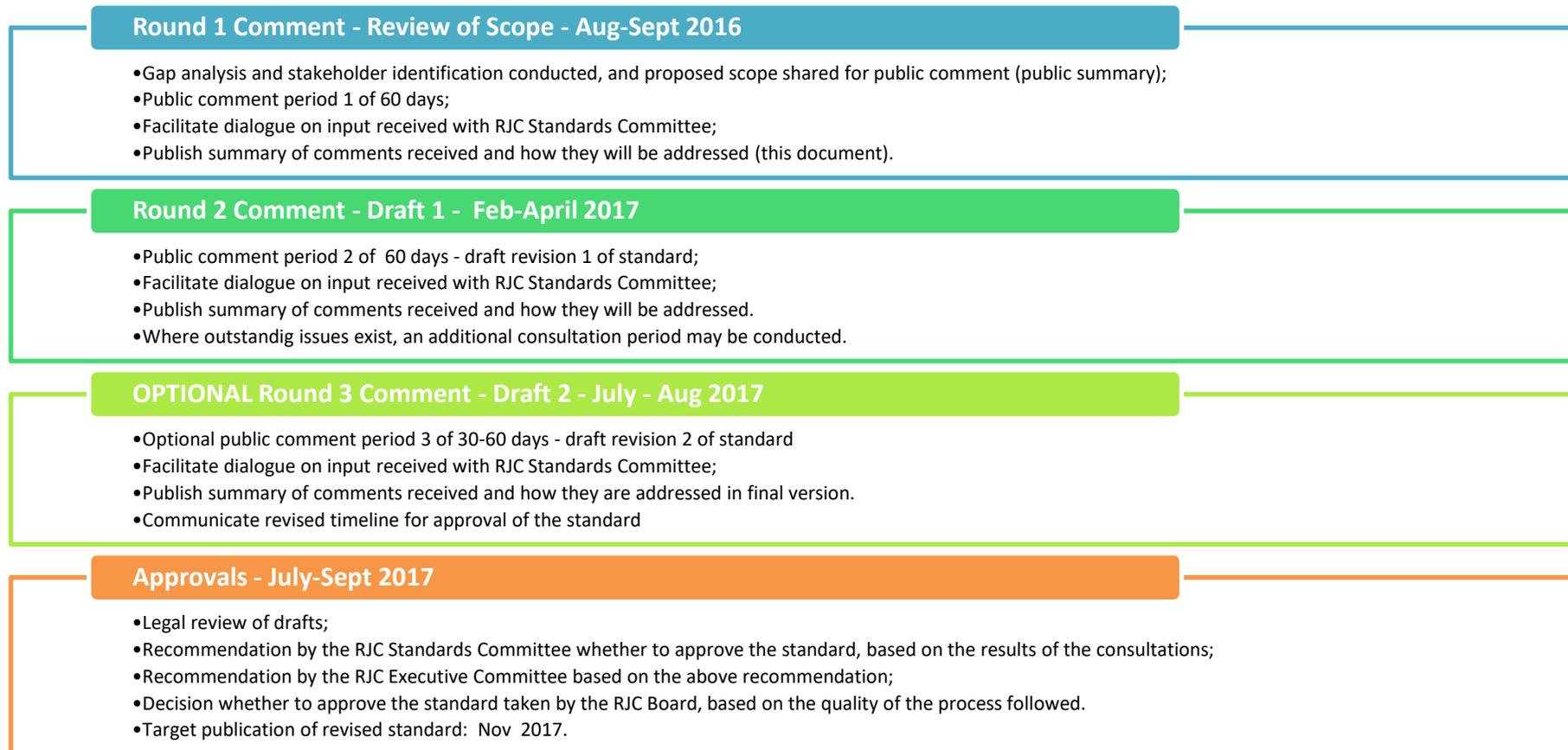


Table 2 – Review areas for Chain-of-Custody Standard - as presented in the Public Summary document

Review area	Notes and references
Cross-recognition and harmonisation	
Cross recognitions	Review cross-recognition of gold refinery audits (eg, CFSI, LBMA) to update and improve alignment, eg on audit frequency, on country of origin risk levels
OECD	Review alignment with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas.
Artisanal and Small Scale Mining (ASM)	Review alignment with ASM standards, including Fairmined Licensee standard for downstream companies.
Streamlining with the Code of Practices (COP)	
Due diligence sourcing provision (CoC 10) and COP responsible supply chains and Human Rights section (COP 5-12)	Review how provisions COP 5 (Business Partners), 6 (Human Rights), 7 (Sourcing from ASM), 9 (Bribery) and 10 (Money Laundering) align with CoC 10 (Conflict Sensitive Sourcing) and consider how to streamline
Other ways to make claims - Provenance Claims	Consider options to develop and promote Provenance Claims to allow different categories of CoC material ¹ . Review models from other standards (eg, Forest Stewardship Council (FSC) categories, including one on mixed sources)
Key topics	
Eligible mined material	CoC 4.1 Sources of CoC eligible mined material. Review how to increase the amount of CoC mined material, large-scale and artisanal and small scale.
Eligible recycled material	CoC 5 Eligible recycled material. Consider the possibility of different requirements for sourcing precious metals which are refined as a secondary product from recycled material (eg e-waste or catalysts).
Requirements for recycled material and inter-refinery trading	CoC 5 Eligible recycled material. Review the requirements related to avoiding supplies from illegitimate sources: the ‘Know Your Customer’ requirements and related requirements in the COP (10) on Money Laundering and Finance of Terrorism. Review Anti-Money Laundering (AML) requirements used by other conflict sensitive mineral sourcing programmes.
Certification and assurance	
General implementation feedback on standard, guidance and assessment	Review log of issues (eg guidance on need for COP and CoC audits when a company acquires a subsidiary), identify opportunities to enhance clarity and reduce redundancy.
Eligibility declarations from RJC COP certified mines	Review and define criteria under which an RJC COP certified mine could declare eligible CoC material without requiring additional CoC audit.
Transfer docs	Review information on transfer documents, eg, add certificate start-end dates)
Data collection	Review data collected and reported from CoC certificates for overall RJC monitoring and evaluation purposes.

¹ ‘CoC material’ is gold or platinum group metals that is certified under the RJC Chain of Custody Standard.