

RJC Chain of Custody 2017 Review - Comment Report with responses on round 2 consultation

This document includes a summary of comments received as part of the round 2 CoC review as well as responses to these comments. These comments were received between November 2023 and January 2024.

Table 1 – Comments and responses on the Chain of Custody Standard from round 2 consultation.

Provision/topic	Question	Comment	Stakeholder	RJC response
Removal of provisions 1 & 2	If no mid-term review has been recommended for the COP certification, is there a need to undertake additional checks during the mid-term surveillance in relation to Human Rights Due Diligence, Due Diligence on Sourcing from Conflict Affected and High-Risk Areas (CAHRAs) and KYC	<i>If the company which is set to undergo mid-term surveillance sources materials from CAHRAs, then additional checks would be appropriate. But, if the company doesn't source from CAHRAs additional checks wouldn't be expedient.</i>	Eduard Stefanescu , C.HAFNER GmbH + Co. KG	Thank you for your comment. We will take this into consideration in the update of the Assessment Manual.
Removal of provisions 1 & 2	Is there any additional information you feel is needed in the CoC Guidance in relation to Due Diligence and KYC provisions?	<i>We fully agree with this approach</i>	Christophe Nicolet, PX Précinox S.A	Thank you for your comment.

Removal of provisions 1 & 2	Is there any additional information you feel is needed in the CoC Guidance in relation to Due Diligence and KYC provisions?	<i>I do not understand why you are removing the principles of OECD risk management from the standard. The standard must be aligned with OECD provisions, nothing is being duplicated.</i>	Andres Castellanos, Fairalloy	Thank you for your comment. The CoC Standard is not stand-alone and these provisions are already fully included in the COP Standard to which all members seeking CoC certification must already fully meet. Moreover many members undergo COP and CoC certification at the same time and duplicating the requirements in the 2 audits is creating an administrative burden for members and auditors.
Removal of provisions 1 & 2	Is there any additional information you feel is needed in the CoC Guidance in relation to Due Diligence and KYC provisions?	<i>We are fine with this</i>	Olivier Demierre, MKS PAMPSA	Thank you for your comment.
Removal of provisions 1 & 2	Is there any additional information you feel is needed in the CoC Guidance in relation to Due Diligence and KYC provisions?	<i>OK WITH REMOVAL</i>	Leo Daguet, LVMH W&J	Thank you for your comment.
Removal of provisions 1 & 2	If no mid-term review has been recommended for the COP certification, is there a need to undertake additional checks during the mid-term surveillance in relation to Human Rights Due Diligence, Due Diligence on Sourcing from Conflict Affected and High-Risk Areas (CAHRAs) and KYC?	<i>If RJC want to be recognized as a serious industry scheme, members of the standards should be audited every year by an auditor that should be attributed by the RJC secretariat and not chosen by the member. RJC members should be required to publish every year in the public domain an annual compliance report based on all requirements of step 5 of the OECD due diligence guidance. In the annex of this report, RJC members should publish all the countries, all the suppliers and all the mines of origin from which their source their raw material during the reporting year. Based on the analysis of the suppliers, RJC secretariat should be able to impose at any time a special audit to any RJC members.</i>	Marc Ummel, SWISSAID	Thank you for your comment. We are currently in the process of reviewing our auditing cycle and frequency, taking into consideration relevant ISO standards for certification & accreditation, as well as best practice among voluntary sustainability schemes. As part of COP 7 and in line with OECD step 5 members are required to annually publicly report on their due diligence systems and practices. This can be done through company website or applicable company reports and publications. As of 2023, we have started to publish summary audit

				<p>reports for refiner members on their RJC profile page.</p> <p>Further reporting requirements for refiners are being proposed as part of CoC 2.5.</p>
Removal of provisions 1 & 2	Is there any additional information you feel is needed in the CoC Guidance in relation to Due Diligence and KYC provisions?	<i>Ok to remove the duplicate but the auditor has to check that there was no non-conformity related to KYC provisions noted during the COP certification of the entity</i>	Charlène Nemson, Hermès International	Thank you for your comment. The requirement for members to be already certified to the COP standard would mean that there could not be any open Major non-conformances on these topics as they are critical provisions in the COP Standard. If there are open minor non-conformances progress could be assessed at the surveillance visit.
Removal of provisions 1 & 2	If no mid-term review has been recommended for the COP certification, is there a need to undertake additional checks during the mid-term surveillance in relation to Human Rights Due Diligence, Due Diligence on Sourcing from Conflict Affected and High-Risk Areas (CAHRAs) and KYC?	<i>Audit surveillance 12-24 months Keep the surveillance audit following certification to ensure the proper implementation of operational requirements, but make the surveillance audit following renewal conditional based on audit findings (similar to CoP)</i>	BJOP	Surveillance audits are necessary to ensure ongoing validity of the demonstration of fulfilment of CoC requirements and to support the use of RJC logo and certification by the member on a continuous basis throughout the 3 years certification cycle, as per relevant ISO standards for certification & accreditation.
Removal of provisions 1 & 2	Is there any additional information you feel is needed in the CoC Guidance in relation to Due Diligence and KYC provisions?	<i>Agreed to remove</i>	Simon Houghton-Dodd, Asahi Refining	Thank you for your comment.

Removal of provisions 1 & 2	If no mid-term review has been recommended for the COP certification, is there a need to undertake additional checks during the mid-term surveillance in relation to Human Rights Due Diligence, Due Diligence on Sourcing from Conflict Affected and High-Risk Areas (CAHRAs) and KYC?	<i>Yes, it would be necessary, to make COC standard credible.</i>	Assurance Services International	Thank you for your comment. We will take this into consideration in the update of the Assessment Manual.
Removal of provisions 1 & 2	If no mid-term review has been recommended for the COP certification, is there a need to undertake additional checks during the mid-term surveillance in relation to Human Rights Due Diligence, Due Diligence on Sourcing from Conflict Affected and High-Risk Areas (CAHRAs) and KYC?	<i>Given the volatility of CAHRAs, 24 month reviews (and consideration of the potential need for enhanced Due Diligence) does not seem inappropriate, although if the mid-term audit is deemed onerous, it might be defined as only be needed if there was a triggering condition at some point after certification..?</i>	World Gold Council	Thank you for your comment. We will take this into consideration in the update of the Assessment Manual.
Removal of provisions 1 & 2	General	<i>There is a need to have some level of review of due diligence at a surveillance audit. If its not in the standard its an area where we can find issues after 18 months especially if supply chain has changed. Surveillance audit is a place where we can find those things that are missed.</i>	SGS	Thank you for your comment. We will take this into consideration in the update of the Assessment Manual.
Removal of provisions 1 & 2	General	<i>Should the focus on kyc and due diligence be whether there is a change in supply chain, much like there being a bolt on audit for provenance claims? 3 years is a long time to go without checking.</i>	SCS Global Services	Thank you for your comment. We will take this into consideration in the update of the Assessment Manual.
Removal of provisions 1 & 2	General	<i>There are lots of mergers and acquisitions and it is possible the UBO might change, and we don't know about these changes as it doesn't fall part of CoC. Some amount of due diligence should be carried out in the surveillance audit.</i>	Suhas Risbood, ISOQAR (India) Pvt. Ltd	Thank you for your comment. We will take this into consideration in the update of the Assessment Manual.
Removal of provisions 1 & 2	General	<i>Implement checks which could be simultaneously used to prove to other authorities we have done things inline and wouldn't have to duplicate reporting.</i>	Franz-Jozef Kron, Agosi AG	Thank you for your comment. We will take this into consideration in the update of the Assessment Manual.

Provision 1.7 - Management Systems and Responsibilities	General	<i>Reasonably (according to risk), ensure that CoP requirements are met and that any non-conformities in Human Rights, Due Diligence, and KYC from the CoP audit are resolved and verified before or at the latest during the CoC audit.</i>	BJOP	Thank you for the comment. COP requirements allow minor non-conformances to be worked on during the entire certification period. To require addressing and verifying all non-conformance prior to a CoC certification/recertification or surveillance audit would impact on the current COP and create a two-tier COP certification. Any Major non-conformances against these critical provisions must be addressed for the Member to be certificated.
Provision 4 - Eligible Mined Material	General	<i>There are no CoC certified mines at the moment and the additions to this provision wouldn't make a difference.</i>	Franz-Jozef Kron, Agosi AG	Thank you for your comment. We will look at the due diligence requirements to include to ensure that they can be reasonably met while ensuring that risks are managed.
Provision 4 - Eligible Mined Material	General	<i>If we say should there be a requirement for mines from which tailings are sourced. Do we exclusively mean mines that are still operating?</i>	Eduard Stefanescu , C.HAFNER GmbH + Co. KG	Thank you for your comment. Eligibility will depnd on the due diligence requirements for eligible sources in order to manage risks, this may be on active mines or not.
Provision 4 - Eligible Mined Material	General	<i>Mines don't care about RJC COP or CoC certification. We do not have enough metal to source for our customers, with a focus on business sourcing in the jewellery and pawn industry . It is difficult to source CoC metal as there are more and more constraints on everything.</i>	RJC refiner member	Thank you for your comment.
Provision 1 - Management Systems an	General	<i>Entities must publicly report statistics from each of their sources, including countries of origin. The RJC must publish consolidated data.</i>	Andres Castellanos, Fairalloy	Thank you for your comment. Further reporting requirements for refiners are being proposed as part of CoC 2.5. The RJC does not currently collect such data for all RJC members, however, we are looking into

d Responsibilities				new ways of collecting different kinds of data from our members.
Provision 1 - Management Systems and Responsibilities	General	<i>We recommend that supply chain policies also adhere to recommendations made in the OECD's recently published Handbook on Environmental Due Diligence in Mineral Supply Chains to embed environmental considerations into their mineral supply chain due diligence procedures. While outside the scope of the CoC, we also would welcome a wider definition of high-risk and conflict areas which includes the Amazon, where significant crimes against the environment and Indigenous peoples have been documented.</i>	Charlie Espinosa, Amazon Aid	Thank you for your comment. Provisions on environment and indigenous rights are covered in the COP standard which is currently under review. We welcome further thoughts on the relevant provisions of the COP once this is released for consultation soon. Your comment has been noted.
Provision 2 - Internal Material controls	Is there a need for the provisions on internal material controls to be more prescriptive or for reconciliation requirements and methods to be defined further?	<i>Each entity must periodically publish a report detailing the historical record of the materials declared eligible for the RJC CoC. This report must specify the amount, type of source, and country of origin. In the case of reprocessed gold, it is crucial to clarify that the country of origin refers to the location of the cash-for-gold or pawn shop. The RJC must periodically publish a report detailing the historical record of materials declared eligible for the RJC CoC by all certified entities. This report must specify the amount, type of source, country of origin, and destination country. In the case of reprocessed gold, it is crucial to clarify that the country of origin refers to the location of the cash-for-gold or pawn shop.</i>	Andres Castellanos, Fairalloy	Thank you for your comment. At this moment direct reporting on CoC material is not required. However, further reporting requirements for refiners are being proposed as part of CoC 2.5. The RJC does not currently collect such data for all RJC members, however, we are looking into new ways of collecting different kinds of data from our members.
Provision 2 - Internal Material controls	General	<i>Separation of high-risk sources: Reprocessed and Grandfathered</i>	Andres Castellanos, Fairalloy	Thank you for your comment. The recycled definition is being worked on further in light of all the comments received. Grandfathered (legacied) and recycled/reprocessed would continue to have to be declared separately on any transfer documents.

Provision 2 - Internal Material controls	Is there any particular support needed to implement this provision in the CoC Standard?	<i>We are restricted in making public the confidential information as to quantity and mine of origin. We are on the other hand fine with the existing process of reporting per mine data to the RJC on a confidential basis. We are fine if RJC publishes aggregate information that does not alter the confidentiality of our data.</i>	Olivier Demierre, MKS PAMP SA	Thank you for your comment. We will take this into consideration in developing the standards guidance.
Provision 2 - Internal Material controls	Is there a need for the provisions on internal material controls to be more prescriptive or for reconciliation requirements and methods to be defined further?	<i>We support stronger transparency in the gold supply chain and especially on the sourcing strategy of refiners, which play a critical role in the value chain. Knowing the country and mine of origin of gold is key to build more responsible sourcing strategy. We are also aware that sharing publicly that kind of sensitive information can be challenging for refiner. We propose that if refiners are not comfortable with sharing publicly this information they have to share it with their clients and the RJC.</i>	Leo Daguet, LVMH W&J	Thank you for your comment. We will take this into consideration in developing the standards guidance.
Provision 2 - Internal Material controls	Is there a need for the provisions on internal material controls to be more prescriptive or for reconciliation requirements and methods to be defined further?	<i>We support the amendment to the provision on internal material controls which requires refiner entities to publicly report on the mine of origin and material received, as this will ensure accountability. Although we are aware of the concern of confidentiality, particularly if for safety reasons to protect vulnerable ASM producers, we have concern about the vagueness of the phrase "with due regard to business confidentiality" and feel it should be more clearly defined.</i>	Charlie Espinosa, Amazon Aid	Thank you for your comment. We will take this into consideration in developing the standards guidance.
Provision 2 - Internal Material controls	Is there a need for the provisions on internal material controls to be more prescriptive or for reconciliation requirements and methods to be defined further?	<i>The RJC COP and COC currently fails to comply with some of the requirements of Step 5 of the OECD Guidance. These state, among other things, that "the identity of the refiner and the local exporter located in red flag locations should always be disclosed" (footnote number 59). The OECD has confirmed that the disclosure obligation implies public communication. If the RJC standards want to be aligned on the OECD guidance, they should include this requirement. Provision 2.5 should be applied not only to all refiners but also to all downstream actors from the supply chains. For example, all watch/jewelry companies should be required to disclose in their annual report from which refineries they source their gold and from which suppliers/mines of origin (if the gold is not segregated, they should have to mention it).</i>	Marc Ummel, SWISSAID	Thank you for your comment. This feedback is more applicable to the COP standard which is applicable to all RJC members, and is currently under review. We welcome your feedback as part of this review, your comment has been noted.

Provision 2 - Internal Material controls	Is there a need for the provisions on internal material controls to be more prescriptive or for reconciliation requirements and methods to be defined further?	<i>No but there should be an acceptance that most of this information is commercially sensitive</i>	Simon Houghton-Dodd, Asahi Refining	Thank you for your comment. We will take this into consideration in developing the standards guidance.
Provision 2 - Internal Material controls	Is there a need for the provisions on internal material controls to be more prescriptive or for reconciliation requirements and methods to be defined further?	<i>"Internal material control systems" is too vague of a notion, to be verified effectively. No performance level is required. To disclose publicly the sources of materials and mines while keeping confidentiality does not make it an applicable requirement.</i>	Assurance Services International	Thank you for your comment. It would be useful to have further information on which of the provisions 2.1-2.4 you feel are not sufficiently clear in the requirements set. In relation to provision 2.5 this is taken from the proposed COP amendments and we will ensure that this requirement and associated guidance remains aligned.
Provision 2.4 - Internal Material Controls	General	<i>The entity's internal systems shall verify and document that the contents of each shipment of CoC material received from, or dispatched to, other certified entities, <u>certified</u> outsourcing contractors, or <u>certified</u> service companies are accurately described by the applicable CoC transfer document for that shipment</i> <i>Explanation: Avoid auditors from having this disposition applied for any outsourcing contractor or service company, certified or not</i>	Richemont International SA	Thank you for your comment. We agree that this clarification could be useful. In order to ensure that the accuracy of materials received are being verified in all cases we should also add the following "or through equivalent records in cases where the use of a transfer document has been suspended in line with the requirements in 8.1 (8.4)"
Provision 2.4 - Internal Material Controls	General	<i>Clarify that all entities, including subcontractors and service companies, are indeed certified.</i>	BJOP	Thank you for your comment. Can you please clarify what you are proposing as outsourced contractors and service companies are not required to be CoC certified as long as the member is exercising sufficient due diligence over these entities?
Provision 2.5 - Internal	General	<i>Define the required characteristics; for example, nature, form, title</i>	BJOP	Thank you for your comment. This provision has been taken directly from the latest draft of the CoP. Your comment will be considered as part of the COP review, but

Material Controls				the eventual text in the CoC will be aligned to that Standard.
Provision 2.5 - Internal Material Controls	General	<p><i>This paragraph is redundant with new COP7.4 => one of those should be removed to avoid redundancy in both standards and potential discrepancies over time.</i></p> <p><i>characteristics of the materials handled: use another word instead of "characteristics" for better understanding, or add the list of the characteristics the refiners are supposed to collect and report.</i></p> <p><i>In addition, as discussed during our 3 days meeting in Dec: "origin" has a very specific signification for gold, and this word should not be used as it is in this paragraph.</i></p>	Richemont International SA	Thank you for your comment. This provision has been taken directly from the proposed provision 7.4 in the forthcoming COP Standard, as the CoC will be released prior to the COP. It is intended that this provision will be removed from the CoC in due course once all members are certified to the new COP. The eventual text in the CoC will be aligned to that COP if further changes are implemented in that standard as a result of their separate consultation.
Provision 3 - Outsourcing Contractors and Service Companies	Does this approach provide a reasonable balance on management of risks or should additional specific requirements be included in this regard?	<i>OK with the change</i>	Leo Daguet, LVMH W&J	Thank you for your comment

<p>Provision 3 - Outsourcing Contractors and Service Companies</p>	<p>Does this approach provide a reasonable balance on management of risks or should additional specific requirements be included in this regard?</p>	<p><i>It is very confusing to designate an owned or affiliated entity as a service provider. This will also create confusion if a member sells its product through both affiliated and non-affiliated retail networks. The same product could keep its CoC quality if sent to the member's own boutique, but would lose it if it is sold to a multi-brand store? And what about change of ownership : if the member is a wholesaler to an affiliated network of boutiques, can these still be considered service providers when they legally are clients? We understand the idea of making it easier for CoC products to reach store shelves since the downstream part of the value chain present little risk for material mixing (the product is finished, often serialised and engraved and well traced) but we are not sure that using the "outsourcing" route is the best to achieve this</i></p>	<p>Charlène Nemson, Hermès International</p>	<p>Thank you for your comment. This provision covers both outsourcing and service companies. Under the current version of the COC Standard the COC status of the finished product is not affected if finished products are sent using 3rd party distribution companies or delivered (including with change of ownership) using 3rd party logistics companies. Moreover, as these are classed as low risk no audit of such entities is required. On the other hand, if a member has their own logistics or retail operations they are required to include these in the certification scope and they are subject to audit which is creating an additional cost burden and potential disadvantage. The RJC will look again at the wording of this provision to see how additional clarity can be brought. Further clarification of these definitions will be included in the guidance.</p>
<p>Provision 3 - Outsourcing Contractors and Service Companies</p>	<p>What additional information would you like to see in the CoC guidance to provide further clarity over requirements on outsourcing contractors and service companies?</p>	<p><i>What happens in case of change of ownership (or not) along the value chain must be very clearly specified. Differentiation between risk for raw material or components (i.e. easy to mix) vs. finished or almost finished products should also be addressed</i></p>	<p>Charlène Nemson, Hermès International</p>	<p>Thank you for your comment. We will ensure this is covered in the updated guidance.</p>

Provision 3 - Outsourcing Contractors and Service Companies	Does this approach provide a reasonable balance on management of risks or should additional specific requirements be included in this regard?	<i>Current requirement is sufficient.</i>	Aki Kuwayama , ASAHI METALFIN E, Inc	Thank you for your comment
Provision 3 - Outsourcing Contractors and Service Companies	Does this approach provide a reasonable balance on management of risks or should additional specific requirements be included in this regard?	<i>very few refiners own logistics companies, because of the value of shipments these are carried out by specialist contractors. Retail subsidiaries should definitely be captured</i>	Simon Houghton- Dodd, Asahi Refining	Thank you for your comment
Provision 3 - Outsourcing Contractors and Service Companies	General	<i>Guide Clarify the CoC scope in the Assessment Manual document because it is stated in paragraph 7.4, "For example, a member can choose to seek CoC certification for only some of the mines or factories under its control," implying that distribution is not necessarily included.</i>	BJOP	Thank you for your comment. We will ensure that this is considered in the revision of the Guidance Document.

<p>Provision 3.2 - Outsourcing Contractors and Service Companies</p>	<p>General</p>	<p><i>Where material has been provided to an outsourced contractor and surplus material is being returned, the member shall have systems in place to verify that the material being returned has come from an original consignment, and that it is still identifiable either through the items or components being of a unique nature or the packaging remaining intact.</i></p> <p>Explanation: This disposition must be applied in any cases of material provided to an outsourced contractor or a service company without a transfer document and coming back, being a surplus of the original material or having been transformed by the sub-contractor.</p>	<p>Richemont International SA</p>	<p>Thank you for your comment. This provision relates specifically to surplus material that has not been transformed and therefore remains identifiable as described. Where material has been transformed it could not meet the conditions of still being identifiable through its unique nature or the packaging remaining intact. The requirement to verify other material being returned without a transfer document could more appropriately be included in provision 2.4 as amended above.</p>
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<p>Provision 3.3 - Outsourcing Contractors and Service Companies</p>	<p>General</p>	<p><i>c. Any affiliated entity involved in the logistics, distribution or retail of finished COC products shall not outsource the distribution, logistics or retail of these COC products to any external contractor or service company other than as described in provision 3.1.</i> <i>Explanation:</i> <i>To avoid misunderstanding about the scope of this disposition, which clearly applies to the COC products of the affiliated entity and not to the non-COC ones</i></p> <p><i>c. Any affiliated entity involved in the logistics, distribution or retail of finished COC products shall not outsource the distribution, logistics or retail of these COC products to any external contractor or service company other than as described in provision 3.1.</i> <i>Explanation:</i> <i>To avoid misunderstanding about the scope of this disposition, which clearly applies to the COC products of the affiliated entity and not to the non-COC ones</i></p> <p><i>Additional remark:</i> <i>The Richemont's logistic organization is disconnected from the Maisons' (members') organization. Consequently, the members cannot control the downstream logistic operation and ensure that 3.3.c is properly applied.</i> <i>One option could be to have all the logistics operations to be COC certified. But, according to the current RJC rules, it is impossible to be COC-certified without being an RJC member, paying the appropriate fees, and being COP-certified. In other words, the Richemont internal logistics operation should pay a membership fee while the fees are already paid by the Maisons, and be COP-certified while nothing comparable is required from external service companies => not an acceptable option</i> <i>Another option could include the Richemont internal logistic organization in the Maisons' certification scope. This doesn't make sense if we consider that we have about 10 different Maisons, currently RJC members, that will all include the same logistics organization in their certification scope while still not having any</i></p>	<p>Richemont International SA</p>	<p>Thank you for these comments. We will update the wording to ensure there is clarity and look again at how we can cover logistics operations without imposing unnecessary additional costs and requirements. The intention/expectation of the Standard would be that Member;s in your situation would have conducted a risk assessment to verify what level of oversight would be required on these operations and undertake internal audits as needed to verify their conformance to teh requirements.</p>
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Provision 4 - Eligible Mined Material	Provision 4.1f has been added to include tailings as an eligible mined source in the same way that processing residues are accepted under Provision 4.1e. This means members would have to undertake due diligence and KYC checks in line with COP 7 and COP 12.	<i>I agree, this level of due diligence is sufficient for suppliers of tailing</i>	Eduard Stefanescu , C.HAFNER GmbH + Co. KG	Thank you for your comment. Given the general trend of responses we will update the requirement to ensure the expectations of due diligence checks are sufficiently rigorous and clear.
Provision 4 - Eligible Mined Material	General	<i>We see many organisations using different types of software to track internal material and the different technologies can divert us from the essence of the provision.</i>	Suhas Risbood, ISOQAR (India) Pvt. Ltd	Thank you for your comment. We will provide additional guidance in the assessment manual on the level of verification expected of the CABs.
Provision 4 - Eligible Mined Material	General	<i>See 15. Additionally, a clear frontier should be drawn between ASM and MSM. It is unfair to see MSM gold hitting the market as ASM one.</i>	Patrick Shein, Gold by Gold	Thank you for your comment. This point can be included in the discussions of the ASM working group to ensure there is sufficient consultation on the definition and delineation.
Provision 4.1 - Eligible Mined Material		<i>On eligible material 4.2 shiv includes: "A- mines that are within its CoC certification scope.../... F- tailings whether ceased or currently active, from which precious metals can be extracted, for which an eligible material declaration may only be issued by the refiner." This is a back door entry for mined material. It means that the mine or processing plant of the tailing is not obliged to be certified against your standards contrary to A. A tailing is a mineral ressource and should be considered as that. If it is considered as a waste, the point is even more important as the wastes can contain deleterious elements.</i>	Patrick Shein, Gold by Gold	Thank you for your comment. The list of options in this provision is inclusive (the provision allows inclusion if <u>any</u> of the conditions are met) and there is, therefore, not a contradiction. Based on the feedback received we will be enhancing the due diligence requirements in the provision supported by further details in the guidance document.

Provision 4 - Eligible Mined Material	Do you feel this level of due diligence is sufficient for suppliers of tailings?	<i>Yes this level of due diligence is sufficient for suppliers of tailings but the linkage with COP 7 and COP 12 is not obvious to us. Also, we believe it would be useful to :</i> <ul style="list-style-type: none"> - clarify elements of 4.1 are not cumulative - clarify what RJC recognised refers to in c and d - clarify the requirements for e and f that seem very loose. <i>In addition, 4.2 is confusing us : on one hand, there is and RJC-accepted assurance scheme and on the other hand RJC requires close to a full audit on top of it.</i>	Olivier Demierre, MKS PAMP SA	Thank you for your comment. We will review the final wording to ensure there is clarity on the points raised. RJC recognised schemes as well as the details of what is included in e and f are clarified in the guidance and assessment manual - further clarification can be provided if needed. In relation to 4.2 the requirements are in relation to those provisions that are NOT aligned in the recognised assurance schemes. We will ensure that this is clarified in the guidance document.
Provision 4 - Eligible Mined Material	Is there a need to clarify further the provisions on accepting tailings as an eligible mine source as well as the required due diligence?	<i>Further examination is needed to analyze the distinctions between re-mining closed mines and re-mining tailings at active mining sites. The broad inclusion of tailings from both defunct and presently operational mines lacks precision in addressing the diverse circumstances surrounding the extraction of precious metals from tailings. It is customary for certain mining operations to subject their tailings to processing by multiple refiners, each dealing with materials of varying gold concentrations—a practice already falling under the umbrella of "mined material." However, complexities may arise, particularly in cases where operations involve re-mining tailings or waste from discontinued activities, leading to the regeneration of lands previously adversely affected by mining operations. These distinct operations carry significantly different environmental impacts.</i>	Anonymo us	Members who source tailings will need to ensure these meet the requirements around responsible sourcing and conduct a necessary level of due diligence on the material to ensure the any relevant risks are addressed. Detail around how this is to be conducted will be outlined in the guidance, including guidance on sourcing from tailings on discontinued mine operations, as well as active.
Provision 4 - Eligible Mined Material	Do you feel this level of due diligence is sufficient for suppliers of tailings?	<i>Okay with the change</i>	Leo Daguët, LVMH W&J	Thank you for your comment

Provision 4 - Eligible Mined Material	Do you feel this level of due diligence is sufficient for suppliers of tailings?	<p><i>Tailings are a product of mining and an important part of the mining operation. They also may represent significant risks to the population and the environment, because of possible spillage, toxic content, etc. Today's tailings (considered as waste) are often tomorrow's mining material where it becomes economically viable to use them as a resource.</i></p> <p><i>Having just basic due diligence to this high-risk process of the mining (or re-mining) activity would introduce a very important loophole in the RJC standard, resulting in potentially significant negative reputational consequences for the RJC members. Tailings should therefore be treated in the same way as mined material and should be in the scope of a certification against a recognized and legitimate mining standard.</i></p>	Marcin Piersiak, Alliance for Responsible Mining	Thank you for your comment. We will ensure this provision reflects the need for such enhanced verification.
Provision 4 - Eligible Mined Material	Is there a need to clarify further the provisions on accepting tailings as an eligible mine source as well as the required due diligence?	<i>Tailings should be in the scope of mining certification, rather than just due diligence.</i>	Marcin Piersiak, Alliance for Responsible Mining	Thank you for your comment. We will ensure this provision reflects the need for enhanced verification.
Provision 4 - Eligible Mined Material	General	<i>Important to ensure that there are no loopholes, that could compromise the credibility of the RJC system. Since RJC is much more focused on the jewelry supply chains, it is recommended to work closely with recognized standards focussing on mining and processing, for both artisanal and industrial scale.</i>	Marcin Piersiak, Alliance for Responsible Mining	Thank you for your comment. The RJC looks to engage with relevant initiatives and organisations in this area, as well as incorporating expertise through the multistakeholder standards committee.
Provision 4 - Eligible Mined Material	Is there a need to clarify further the provisions on accepting tailings as an eligible mine source as well as the required due diligence?	<i>The methods and protocols of tailings reprocessing vary widely and are affected by the producing country's legislation. A legal entity may wish to reprocess tailings abandoned by an illicit or illegal entity, which creates grey areas around ownership and due diligence. In other instances, due to price fluctuations, an operation may re-mine a site that it or another entity previously mined, generating new negative environmental impacts. This requires a narrower definition of tailings which addresses, among other aspects, the differences between re-mining closed mines versus re-mining tailings at operating mines.</i>	Charlie Espinosa, Amazon Aid	Members who source tailings will need to ensure these meet the requirements around responsible sourcing and conduct a necessary level of due diligence on the material to ensure the any relevant risks are addressed. Detail around how this is to be conducted will be outlined in the guidance, including guidance on sourcing from tailings on discontinued mine operations, as well as active.

Provision 4 - Eligible Mined Material	General	<i>Shall also accept material from Fairtrade and Fairmined certified mines.</i>	Desirée Binternage I, Fairever GmbH	Thank you for your comment. These certifications are included in the recognised Standards for eligible mined material.
Provision 4 - Eligible Mined Material	Do you feel this level of due diligence is sufficient for suppliers of tailings?	<i>No, a tailing is just another kind of mine</i>	Charlène Nemson, Hermès International	Thank you for your comment. The RJC will ensure this provision reflects the need for enhanced verification.
Provision 4 - Eligible Mined Material	Is there a need to clarify further the provisions on accepting tailings as an eligible mine source as well as the required due diligence?	<i>Yes, why would a tailing be treated differently than a mine?</i>	Charlène Nemson, Hermès International	Thank you for your comment. The RJC will ensure this provision reflects the need for enhanced verification.
Provision 4 - Eligible Mined Material	Provision 4.1f has been added to include tailings as an eligible mined source in the same way that processing residues are accepted under Provision 4.1e. This means members would have to undertake due diligence and KYC checks in line with COP 7 and COP 12.	<i>Tailings are a very small and specific element in supply chains of precious metal, and are not covered by standard KYC forms, if RJC want to include this they should create a "tailings KYC" template to ensure consistency across the sector and avoid companies engaged in this activity being asked a spectrum of different questions or requirements</i>	Simon Houghton- Dodd, Asahi Refining	Thank you for your comment. The RJC will review the Guidance Document to see what additional support can be provided.
Provision 4 - Eligible Mined Material	Provision 4.1f has been added to include tailings as an eligible mined source in the same way that processing residues are accepted under Provision 4.1e. This means members would have to undertake due diligence and KYC checks in line with COP 7 and COP 12.	<i>The phrase 'suppliers of tailings' strike me as odd... tailings are site-level repositories of waste from which metallic material may potentially be extracted, but the material is then passed to the refiner in a concentrated form</i>	World Gold Council	Thank you for your comment, I cannot see the phrase "suppliers of tailings" in the latest CoC draft. Could you please provide the reference.
Provision 4 - Eligible Mined Material	General	<i>Very often tailings contain mercury because very often smaller mines uses mercury within processing and then they sell their tailings. Is there anything specific that would be enforced in terms of cyanide management? If these mercury containing tailings are</i>	Dianna Culillas, Swiss	Thank you for your comments. We will ensure that the due diligence requirements include controls on environmental issues and mercury.

		<i>treated in the sanitation plant, this is one of the worst forms of mercury use. Mines should have a system to recover the mercury first.</i>	Better Gold	
Provision 4 - Eligible Mined Material	General	<i>If the standards for tailings would be less strict that would pose a problem because as was explained treatment of tailings is the biggest environmental risk to mined materials in general. The explanation needs to be on par with other mining standards. If you look at it from a motivational perspective it will be positive if tailings are eligible for CoC type materials because it would motivate proper tailings management for mines</i>	Dr Robin Kolvenbach, Argor-Heraeus SA	Thank you for your comment. The RJC will ensure this provision reflects the need for enhanced verification. The potential positive impacts will also be highlighted.
Provision 4 - Eligible Mined Material	General	<i>I think it is consistent for how material is scoped within the COP to include all types of material that is traded. If you are purchasing enough tailings to be a category of sourcing for you especially as the RJC standards don't include base metals I believe the scoping is consistent</i>	SCS Global Services	Thank you for your comment.
Provision 4.1 - Eligible Mined Material	General	<i>Suppliers of 'residue' and 'tailings' (e, f) should undergo verifications equivalent to mines (a to d). Accept gold from legitimate ASM and comply with OECD requirements.</i>	BJOP	Thank you for your comment. This provision will be amended to include this requirement with the guidance updated to match.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>Agosi AG, as a precious metals refiner, strongly opposes the propositions made to alter the eligible materials definition for RJC-CoC.</i> <i>For years it has been the RJC's highest priority to establish and defend credibility and trustworthiness in the precious metals value chain. This has been achieved successfully and the term "recycled" has had a deep impact on both consumer confidence and expectation. In fact, this effect yields significant demand for recycled precious metals and is gaining ever increasing momentum.</i> <i>It would completely contradict any consumer's understanding of "recycled" if renowned jewellery manufacturers were now rephrasing entire marketing campaigns to introduce "reprocessed" pieces of jewellery instead, and if they had to advocate a new</i>	Agosi	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

		<p><i>understanding of an unfamiliar term that is not used elsewhere in this context.</i></p> <p><i>Apart from this, any percentage given in a customs tariff category is not suitable for this kind of material definition as it lacks proper causality and therefore cannot be judged as obligatory.</i></p>		
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<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?</p>	<p><i>"Overwhelming support for this approach from the first round of consultation"???</i></p> <p><i>Personally, I do not support amendments proposed to provision 5.1 (previously 7.1) on eligible recycled material, as well as subsequent provisions which would also be amended as a consequence to 5.1.</i></p> <p><i>The proposed amendments follow a currently unrecognized definition brought forward by a small group of stakeholders not representing the entire supply chain in the global jewellery and watch industry. Moreover, abovementioned definition is highly debated throughout the industry, but is currently far from being agreed upon.</i></p> <p><i>Taking into consideration various discussions from stakeholders representing the entire supply chain, plus the controversial OECD session on PMIF's proposed definition during this year's forum on responsible mineral supply chains (April '23 in Paris), I doubt "overwhelming support" is the right term to describe the current situation around this topic!</i></p> <p><i>"Gold sourced from sources of less than 2% (by weight)..." totally disregards reality and what an entire precious metals recycling industry has been doing for decades...and still does. "End-of-life" or maybe even more suitable "end-of-purpose" gold bearing material (regardless of the precise percentage of gold content, obviously of widely varying composition) is being brought (or sold, if you will) to precious metal refiners. It undergoes a technical process of refining, i.e. the material is technically enabled to enter a new life cycle. That is recycling!</i></p> <p><i>The proposed amendments would not only significantly narrow eligible types of gold-bearing material, but also have a dramatic impact on market shares and market behaviour.</i></p>	<p>Eduard Stefanescu , C.HAFNER GmbH + Co. KG</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
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Provision 5 - Eligible Recycled and Reprocessed Material	Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?	<i>The threshold of 2% lacks a clear technical basis. PMIFs non-exhaustive list of examples of products containing less than 2% of gold has technical shortcomings, also discussed during PMIFs OECD session.</i>	Eduard Stefanescu , C.HAFNER GmbH + Co. KG	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is there any additional information you feel is needed in the CoC guidance to provide further clarity on recycled and reprocessed requirements?	<i>Where does the threshold of 2% by weight come from? Is there a technical basis for this?</i>	Eduard Stefanescu , C.HAFNER GmbH + Co. KG	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>In my opinion, RJC would add an additional step of discrepancy compared to other sector schemes, which would also further complicate EU refiners efforts to adhere to EU 2017/821.</i>	Eduard Stefanescu , C.HAFNER GmbH + Co. KG	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>We are supporting this definition.</i>	Christophe Nicolet, PX Précinox S.A	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this

ed Material				provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<p><i>1. Distinguish between eligible recycled materials and eligible reprocessed materials as two distinct sources. The definition and criteria for material eligibility should be articulated in separate sections. To provide clarity, reprocessed materials refer to high-value gold, silver, and PGM materials, while recycled materials pertain to waste containing less than 2% precious metal content.</i></p> <p><i>2. Define that the source of the processed gold is the individual seller. The entire supply chain, from the pawnshop, including intermediaries and collectors, must be identified, audited and certified.</i></p> <p><i>3. The risk of using fraudulent statements to conceal criminal gold as reprocessed gold is very high. Therefore, each transaction must be supported by evidence in the form of photographic and film records capturing the purchase and the jewelry when it is received by the pawn shop from the individual seller. Additionally, there should be photographic records documenting the process before and after the transformation of jewelry into ingots. These constitute the two crucial points concerning reprocessed gold. This evidence must exist for all reprocessed gold, not for a portion of it.</i></p>	Andres Castellanos, Fairalloy	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?	<i>The origin of the processing must be defined and the high risk of fraud that its use implies, in order to correctly inform the end consumer.</i>	Andres Castellanos, Fairalloy	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

Provision 5 - Eligible Recycled and Reprocessed Material	Is there any additional information you feel is needed in the CoC guidance to provide further clarity on recycled and reprocessed requirements?	<p><i>1. Avoid using the word "reasonable" in relation to verifying the origin and assessing the risks associated with reprocessed gold, as it has a very ambiguous interpretation. Replace the use of this word with clear definitions of origin and evidence.</i></p> <p><i>2. If it is not possible to adopt real practices to establish the true origin of the reprocessed gold, it is suggested to replace the name of the standard "Chain of Custody" with "Reasonable Verification Standard".</i></p>	Andres Castellanos, Fairalloy	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>Recycled and reprocessed are not the same.</i>	Andres Castellanos, Fairalloy	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<p><i>Yes it is. It is important to adopt this distinction as recycling is:</i></p> <p><i>1-legally in the EU and UK attached to waste reprocessing and if one considers high grade gold scrap as recyclable material it means that this material is a waste which is not legally the case. Additionally, it would oblige the collectors and refiners to process this material under local waste regulations.</i></p> <p><i>2-linked to a 'green' action. I am not sure that gold refined from old jewellery scrap would fulfill the EU laws against greenwashing labelling.</i></p> <p><i>3-we need to be protected against any massive greenwashing claims of our sector.</i></p> <p><i>Additionally, fabrication scrap in the EU is considered as a by-product rather than a waste.</i></p>	Patrick Shein, Gold by Gold	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

Provision 5 - Eligible Recycled and Reprocessed Material	Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?	<i>Any CoC gold should be accompanied by its source "CoC recycled" "CoC reprocessed" "CoC LSM/ASM" "CoC Grandfathered"</i>	Patrick Shein, Gold by Gold	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	General	<p><i>1) Access to legitimate ASM. I understand that there will be a working group on ASM. It is important that the decision of this WG can be integrated into the CoC immediately after the process and not wait for the next revision as this one came after 7 years.... If this is not the case, I would urge to extend the ASM integration in this revision. Otherwise I agree with the ARM comments on this issue.</i></p> <p><i>2) Recycling. I have already commented and my position is known. I brought the recycled issue to the PMIF as it was becoming a barrier to ASM entering the supply chain. It is important to have a definition that is in line with the legislation and takes into account the specificities of gold. The interest of the industry is to be protected from accusations of greenwashing and the PMIF definition allows for that. Perhaps the scientific community should be invited to contribute their views. I recently expressed my view in this article: https://www.linkedin.com/pulse/recycled-golds-carbon-footprint-mirage-patrick-schein-ob09e%3FtrackingId=zbqxN%252Bi6QJiwl2QlwJ2TkW%253D%253D/?trackingId=zbqxN%2Bi6QJiwl2QlwJ2TkW%3D%3D</i></p>	Patrick Shein, Gold by Gold	Thank you for your comments. The RJC is committed to reviewing the Standard to incorporate any meaningful outcomes from the ASM Working Group in a timely manner. In relation to the definition of recycled, the RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<p><i>The proposed definition for gold</i></p> <ul style="list-style-type: none"> <i>- is a strong departure from the current definition of recycled.</i> <i>- is based on an arbitrary percentage that would essentially represent no volume.</i> <i>- is not addressing the root issues associated with the current "recycled" terminology but shifting them to a "reprocessed" category.</i> 	Olivier Demierre, MKS PAMP SA	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the

		<ul style="list-style-type: none"> - represents a sharp departure from all existing definitions (OECD, LBMA, RMI) that will likely be opposed by end users. - is completely inconsistent with the definition used for other precious metals. - We are convinced as a result that the proposed definition will contribute to an even greater confusion by end users. - We support instead a clarification of the term "recycled" by the addition of subcategories such as bullion, jewelry, ... - It would probably be practical that RJC differs its new definition until ISO working group (including LBMA and RJC) on this topic comes out with a standard approach. 		topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>Johnson Matthey support the response of the European Precious Metal Federation (EPMF) to this proposal. We believe that the definition of Recycled and Reprocessed Gold adopted by the RJC should ideally apply to all Precious Metals. However, the definitions proposed by PMIF are not suitable in this broader context. As a result, Johnson Matthey prefers that the RJC maintain its current definition until the outcome of the work of ISO TC 174 is released. A new definition can then be considered based upon the new ISO standard.</i>	Jane Patrick, Johnson Matthey	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>The PMIF proposed definition for recycled gold finally aligns the meaning of the word recycled with its meaning in all other industries - that materials are diverted from a waste stream. We support this definition and the addition of "reprocessed" with its own definition into the standard.</i>	Ana Brazaityte, Christina T Miller Sustainable Jewelry Consulting	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

Provision 5 - Eligible Recycled and Reprocessed Material	Is there any additional information you feel is needed in the CoC guidance to provide further clarity on recycled and reprocessed requirements?	<i>Providing the full definition and explanation from the PMIF would be useful as this is a big change from the status quo</i>	Ana Brazaityte, Christina T Miller Sustainable Jewelry Consulting	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>We support the removal of investment products from eligibility for recycled material. This was too much of a loophole allowing pre-consumer material or various and possibly unknown origins to be considered recycled. Regarding striking of byproduct from the mining of other ore from "recycled" - We are glad to see this previously added provision struck from this version. Whether primary target mineral or byproduct, it is simply newly mined material.</i>	Ana Brazaityte, Christina T Miller Sustainable Jewelry Consulting	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>Are small coins and bars (up to 100 oz.) included in CoC recycled material? They are made for use for by the public. Once their "purpose" has been fulfilled and they are redeemed for other "monies", this metal can now serve another purpose by recycling it for use in industry. If that is not the case, can you share the reason why that would not be the case?</i> <i>In addition, United Precious Metals Refining is 100% recycled. We are a Good Delivery Comex - meaning we can pour 100 oz. gold bars for delivery on the futures exchange. Why would a bar like this not be permitted as CoC? It is an "investment" bar that is generated from recycled sources.</i>	Mike Mikolay, United Precious Metals Refining, Inc	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

<p>Provision 5 - Eligible Recycled and Reprocess ed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?</p>	<p><i>- Re: Addition of "reprocessed" and defining "recycled" as per PMIF definition - The proposed definition for recycled gold by PMIF successfully aligns the term "recycled" with its universal meaning across various industries, signifying the diversion of materials from a waste stream. We endorse this definition and advocate for the incorporation of "reprocessed" along with its distinct definition into the standard.</i></p> <p><i>- Re: including the phrase "this does not include investment products" - We endorse the exclusion of investment products from being eligible as recycled material. This move addresses a significant loophole that previously permitted the inclusion of pre-consumer material or materials with diverse and potentially unknown origins under the umbrella of recycled content.</i></p> <p><i>- Re: striking of byproduct from the mining of other ore from "recycled" - We appreciate the removal of the previously included provision in this version. Whether classified as a primary target mineral or byproduct, it essentially constitutes newly mined material.</i></p>	<p>Anonymo us</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
<p>Provision 5 - Eligible Recycled and Reprocess ed Material</p>	<p>Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?</p>	<p><i>We believe universal language should be used to ensure clarity for the consumer and ease in reporting on the various feedstocks coming into the jewellery supply chain.</i></p>	<p>Anonymo us</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>

<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?</p>	<p><i>We have identified certain inconsistencies between the definition developed within the PMIF, which have been now proposed by the RJC and existing frameworks, among others the circularity framework from the United Nations Environmental Programme (UNEP) or, the proposed Product Environmental Footprint (PEF) method by the European commission, which both require an amendment of the PMIF definition and, as a consequence, also of the proposed RJC CoC standard under Provision 5.</i></p> <p><i>In addition, it would be of value to add yet another layer of transparency to the RJC CoC standard that not only differentiates between “Recycled” and “Reprocessed” materials, but if it would be identifiable, if a product is made out of secondary materials from the production chain or from “end of use” materials.</i></p> <p><i>In addition, it would be of high value if the RJC CoC standard would be universally applied to all precious metals and makes no difference between Gold and all other precious metals including Silver.</i></p> <p><i>Following a very similar spirit of the PMIF definition and the RJC CoC proposal, it is vital that the RJC CoC standard, (a) limits adverse business practices, (b) supports the further development of secondary market,</i></p> <p><i>(c) is easy to understand and aligns as closely as possible with the general public's understanding of “recycled” and (d) remains in reasonable accordance with existing definitions</i></p>	<p>Dr Robin Kolvenbach, Argor-Heraeus SA</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
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<p>Provision 5 - Eligible Recycled and Reprocess ed Material</p>	<p>General</p>	<p><i>Replace the “less than 2% gold in weight” criterium against a broader definition that is in line with the concept of “end of life” as defined by UNEP1, which refers to the point in time where “the product or object is no longer able to function or perform as required, and for which there are no other options for the product but to be recycled or disposed into the environment”.</i></p> <p><i>Reasoning: the definition by the PMIF and proposed for the new RJC CoC standard, which says that “Recycled Gold” can only be obtained from materials that are “destined to be discarded” has not considered the “end-of-life” stage of products. As defined by the UNEP, “end-of-life” refers to the point in a product lifecycle, where a “product or object is no longer able to function or perform as required, and for which there are no other options for the product but to be recycled or disposed into the environment”.</i></p> <p><i>The concept of end-of-life (EOL) is a logical and stringent approach to define precious metals “Recycled Material” including “Recycled Gold”. The EOL concept has also been employed by the European Commission within the proposed Product Environmental Footprint (PEF) method.</i></p> <p><i>Whilst the identifier for Gold of “less than 2% gold in weight” works well to identify gold containing materials that are “destined to be discarded”, it falls short of including many Gold and other precious metals streams (e.g. resulting from industrial processes), which have reached their “end of-life” and for which there are no other options for the product to be recycled or disposed into the environment and which have a concentration well above 2%.</i></p> <p><i>This criterion of EOL is in the same spirit with the PMIF and proposed for the new RJC CoC standard definition’s “destined to be discarded” where both definitions results in materials which have been used and when being returned to a refiner, require complex processing to preserve their value within the market. However, the concept of EOL, as compared to “destined to be discarded”, can further avoid loopholes and ensure that “Recycled Material” only encompasses materials that have been used by end users for its intended purpose and are no longer able to function or perform,</i></p>	<p>Dr Robin Kolvenbach, Argor-Heraeus SA</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
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		<p><i>and for which there are no other options but to be returned to a refiner.</i></p> <p><i>As it is desirable to have a general and standardized definition of recycled precious metals also other than gold and silver, it needs to be recognized that also here the 2% in weight does not work to identify end-of-life materials containing precious metals. Materials such as spent catalytic gauzes commonly contain higher concentrations.</i></p> <p><i>The same holds for other precious metals or metals, where a general alignment of the term is desirable for the benefit of overall transparency.</i></p> <p><i>As it is desirable to have a general and standardized definition of recycled precious metals also other than gold and silver, it needs to be recognized that also here the 2% in weight does not work to identify end-of-life materials containing precious metals. Materials such as spent catalytic gauzes commonly contain higher concentrations.</i></p> <p><i>The same holds for other precious metals or metals, where a general alignment of the term is desirable for the benefit of overall transparency.</i></p> <p><i>Increase granularity of the term "Reprocessed" by amending it by 2 subcategories, being "Recovered" and "Remanufactured" precious metal. In this context, "Recovered Gold" would be any "material that is diverted from the manufacturing stage as waste or scrap and is subsequently brought to a refiner (or other downstream intermediate processors) to begin a new lifecycle." whilst "Remanufactured Gold" would define "material that is derived from the treatment of product at their end-of-use (EOU) and is subsequently brought to a refiner (or other downstream intermediate processors) to re-enter a new product use stage. According to United Nations Environment Program (UNEP)², "End of Use" refers to the point in the product life at which the product may not be needed, or able to function or perform as required by the current owner/user, and for which there are other options</i></p>		
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		<p><i>available to keep the product and/or its components within the market.</i></p> <p><i>Reasoning: following the general philosophy of the PMIF definition to create transparency on the material type for consumers, it would be an additional value if it would be identifiable, if a product is made from secondary materials from the production chain or from "end of use" materials.</i></p>		
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<p>Provision 5 - Eligible Recycled and Reprocess ed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?</p>	<p><i>We are OK with the PMIF definition to be used for gold from secondary source in the COC standard.</i> <i>We also advise RJC to monitor the consensus which could be reached at ISO on the same topic, and potentially to update the COC definition in a second step. Especially, we consider that differentiating between “pre-consumer recycled (or reprocessed)” and “post-consumer recycled” gold could be both positive for the industry and maybe clearer for the end-client.</i></p>	<p>Leo Daguet, LVMH W&J</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
<p>Provision 5 - Eligible Recycled and Reprocess ed Material</p>	<p>Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?</p>	<p><i>As shared above, we believe a distinction between pre-consumer and post-consumer could be easier to understand by the end consumer.</i></p>	<p>Leo Daguet, LVMH W&J</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>

<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed</p>	<p><i>The European Precious Metals Federation (EPMF: https://www.epmf.be/) represents 35 member companies (like Umicore, Heraeus, C.Hafner, Aurubis, Johnson Matthey, Richemont, Metalor, Valcambi, Tanaka etc. More: https://www.epmf.be/members/) and 3 national associations that are world leaders in extraction, refining, and recycling of precious metals (gold, silver, rhenium, and the six metals referred to as the Platinum Group, including platinum, palladium, osmium, rhodium, ruthenium, and iridium). The EPMF members are involved in consumer and industrial applications that touch the lives of European and global citizens from jewellery to financial investments and different industrial applications (electronics, grids, wind turbine, PV etc.). Worth mentioning, the EPMF members do follow RJC Code of Practices Standard (COP) and/or Custody Standard (CoC) and are also RJC members.</i></p> <p><i>The EPMF is opposing amendments to replace the current RJC definition with the Precious Metals Impact Forum (PMIF) definition for recycled and reprocessed gold.</i></p> <p><i>The main reason is the ongoing work at ISO TC 174 level. This work just started and the outcome (expected in 2026) must be used as the driver for the RJC update. We, therefore, recommend that no change is implemented until the end of this work.</i></p> <p><i>In parallel, the EPMF has also developed key principles to follow in the context of a change/amendment of the existing definition:</i></p> <ul style="list-style-type: none"> <i>- most important that the definition is universal and can be applied to all (precious) metals and not only to gold;</i> <i>- the PMIF proposal introduces new wording (“reprocessed”), which has no regulatory existence at EU or UN or ISO levels, and will bring confusion in the regulatory context. The PMIF’s term of “reprocessed” gold is a term created solely by PMIF and is not aligned with any other existing wording in other regulatory proposals, e.g., according to Article 2 of the EU Critical Raw Materials Act, “processing’ means all physical, chemical and biological processes involved in the transformation of a raw material from ores, minerals, plant products or waste into pure metals, alloys or other economically usable forms, including but</i> 	<p>Zinaida Nazarenko , European Precious Metals Federation (EPMF)</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
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		<p><i>not limited to beneficiation, separation, smelting and refining, and excluding metal working and further transformation into intermediate and final goods”;</i></p> <ul style="list-style-type: none"><i>- the concept of pre- and post- consumer is missing and this concept is of paramount importance too;</i><i>- the threshold approach is interesting but questionable as proposal is based on customs rules that have different background and consequences.</i> <p><i>Lastly, we would like to encourage RJC and the other associations (LBMA, PMIF, and etc.) to better coordinate their efforts regarding this important issue with key regulatory and business implications, and to avoid duplication with the ongoing work at ISO level.</i></p>		
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<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?</p>	<p><i>ARM strongly supports including this definition of recycled and reprocessed gold of PMIF. The current, broad definition of recycled, created a strong current of jewelry businesses claiming that reusing gold is an “ethical” option that helps avoid mining. These claims are not only misleading, and could in the future pose important risks of greenwashing accusations, but they have been displacing industry initiatives, that were addressing the real supply chain challenges requiring additional effort and resources: namely engaging with and improving the conditions in the ASM, and recycling waste containing trace quantities of precious metals. The widespread use of the “ethical recycled” practice by RJC members, while lacking information on the origin and ignoring real challenges, has led to RJC certification losing credibility with civil society.</i></p> <p><i>The decision to change the definition is therefore an important breakthrough. Calling things by their real names is a key first step, and we encourage the RJC to further incentivize its members to choose sourcing options that can demonstrably contribute to Sustainable Development Goals, as described in RJC’s Roadmap to 2030.</i></p>	<p>Marcin Piersiak, Alliance for Responsible Mining</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?</p>	<p><i>Guidance on claims would be important to help RJC members mitigate the risks of greenwashing.</i></p>	<p>Marcin Piersiak, Alliance for Responsible Mining</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry. We will ensure that guidance on claims is also reviewed.</p>

Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>Claims related to sourcing options that have more demonstrable impact, such as ASM or "real recycled" should be stronger than the "business as usual" reprocessed or grandfathered material. RJC should delimit a baseline of sourcing that at least is not harmful, but encourage its members to go the extra mile to drive positive change.</i>	Marcin Piersiak, Alliance for Responsible Mining	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>We support this definition and the addition of "reprocessed" with its own definition into the standard. We also support the removal of investment products from eligibility for recycled material.</i>	Charlie Espinosa, Amazon Aid	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>Unfortunately I don't find the time to take part of this consultation. However this issue is of highest importance. The current definition of recycled gold opens the gates for so much gold laundering. Only two processing acts allow that even the worst gold production can be defined as recycled gold. Therefor I fully support the PMIF definition of recycled gold.</i>	Christoph Wiedmer, Society, Society for Threatened Peoples Switzerland	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>The incorporation of the PMIF definition for recycled gold is a very important point. It is a key element that will prevent the RJC to continue being considered as a greenwashing standard for fake "recycled" gold.</i>	Marc Ummel, SWISSAID	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this

ed Material				provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	Is there any additional information you feel is needed in the CoC guidance to provide further clarity on recycled and reprocessed requirements?	<i>The definition of the origin of the recyclable or reprocessible material should be clarified and be much more precise.</i>	Marc Ummel, SWISSAID	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>The incorporation of the PMIF definition for recycled gold is a very important point. It is a key element that will prevent the RJC to continue being considered as a greenwashing standard for fake "recycled" gold.</i>	Marc Ummel, SWISSAID	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>I fully agree to the definition of PMIF and would appreciate the appropriate adjustment to the CoC Standard.</i>	Desirée Binternage I, Fairever GmbH	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

<p>Provision 5 - Eligible Recycled and Reprocess ed Material</p>	<p>Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?</p>	<p>- <i>The end consumer perceives recycled or reprocessed materials as "not mined". It is absolutely necessary, that the end consumer is aware of the fact, that the origin of the material is unknown and traceability stops at the pawn shops / refineries / private seller / etc.</i></p> <p>- <i>In addition, it is necessary to avoid terms such as "sustainable", "green", "ethical" in combination with the term "recycled gold" (as long as it does not yet comply to the new PMIF definition) or the term "reprocessed gold". It is misleading end consumers and shall be under revision under EU's ban of greenwashing.</i> https://www.europarl.europa.eu/news/de/press-room/20230918IPR05412/eu-to-ban-greenwashing-and-improve-consumer-information-on-product-durability</p> <p>- <i>It needs to be made clear that the use of CoC certified material does not equal 100 % traceability and sustainability claims shall be only be made for materials with 100 % traceability.</i></p>	<p>Desirée Binternage l, Fairever GmbH</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
<p>Provision 5 - Eligible Recycled and Reprocess ed Material</p>	<p>General</p>	<p><i>Shall adapt the definition of the PMIF and shall NOT include investment products, such as gold bars and coins.</i></p>	<p>Desirée Binternage l, Fairever GmbH</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
<p>Provision 5 - Eligible Recycled and Reprocess ed Material</p>	<p>General</p>	<p>- <i>It is crucial to further clarify the definition of "recycled gold" as per PMIFs suggestion.</i></p> <p>- <i>It is further necessary that any sustainability claims in combination with the phrase "recycled gold" are forbidden as long as the entity is not able to document the use of "recycled gold" as per PMIFs definition.</i></p> <p>- <i>The term "reprocessed gold" shall not be used in combination with any sustainability claims, such as "ethical", "green", "sustainable", etc.</i></p> <p>- <i>It shall be made clear to end consumers, that reprocessed gold or</i></p>	<p>Desirée Binternage l, Fairever GmbH</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>

		<i>recycled gold is not the equivalent to "not mined". It needs to be made clear that the use of CoC certified material does not equal 100 % traceability and sustainability claims shall be only be made for materials with 100 % traceability.</i>		
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>to be further discussed ; PMIF definition is acceptable but we wonder about : - possible confusion of members and the public if gold is treated differently than silver and platinum - need for checks against international definition of what is recyclable waste and what is a sellable resource</i>	Charlène Nemson, Hermès International	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>This change poses several challenges. 1) RJC Alignment with OECD - RMI urges that the baseline of the definition is grounded in OECD as this definition excludes due diligence. This is critical for cross-recognition with RMI. 2) Reprocessed gold will result in 3 product lines (recycled, reprocessed, and newly mined) which refiners may struggle to sustain resulting in grouping recycled materials into reprocessed and 3) consumer confusion about recycled vs. reprocessed materials 4) the timeline for refiners to implement the new definition as enforcement with 2 definitions is already challenging 5) determining how to verify and describe products during the transition 6) Given the complexity of recovering gold from products containing less than 2% gold, there will be very small amounts of recycled gold available. RMI recommendation is to strengthen the definition and enforcement of recycled vs. newly mined at the refiner level and work towards alignment with OECD, RMI, and other gold standard setters. The recommended definition is as follows: "Recycled gold that has been previously refined, such as end-user, post-consumer and gold-bearing products, scrap and waste metals and materials arising during refining and product manufacturing, which is returned to a refiner or other downstream intermediate processor to begin a new life cycle as 'recycled gold.'" (OECD) "Mining material, of any form or shape or concentration,</i>	RMI	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

		<p><i>including intermediate material that has not yet been fully refined (99.5% or higher), and sold is in its first gold life cycle continues to be mining material; therefore, a partially-refined product with a direct mining origin cannot simply be transferred to another refiner and be reclassified as a recycled material, for which no mine or country of origin would need to be identified. The only exception to this is for low grade scrap and other such materials (less than 1% gold), such as floor sweepings and pollution control materials. For all recycled gold, the refiner shall obtain sufficient information to reasonably exclude false representations made to hide the origin of newly mined gold in recycled gold supply chains." (RMI)</i></p>		
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<p><i>We doubt the necessity of the addition of the PIMF definition with the follow 2 reasons.</i></p> <p><i>①OECD guidance describes the definition of recycled metals. Conflict could be predicted when PMIF definition to recycled metal is accepted by RJC. It would be confusing to members and customers.</i></p> <p><i>②The following disadvantages that could be foreseen:</i></p> <ul style="list-style-type: none"> <i>▪ Burden of considering the separation of each raw material handling will be added on RJC refiner members. And</i> <i>▪ Traceability system will become more complicated and CoC audit could be hardly proceeded smoothly.</i> <p><i>Based on the above reasons, the PMIF definition is suggested not to be included in this version of CoC.</i></p>	Aki Kuwayama , ASAH METALFIN E, Inc	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?	<p><i>PMIF definition is suggested not to be included in this version of CoC.</i></p>	Aki Kuwayama , ASAH METALFIN E, Inc	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>Provision 5.4 - What are the details of "those definitions" in this requirement?</i>	Aki Kuwayama, ASAHI METALFIN E, Inc	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry. In relation to definitions of "scrap" or "waste" we will ensure that all terms are appropriately defined.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>The PMIF definition is extremely restrictive, and impractical for jewellery manufacturers. It does not enjoy support in the jewellery trade. The definition of recycled material needs to include the return of components, finished inventory as well as "estate" jewellery. For example, if a manufacturer has excess inventory of gold findings and needs to recover the gold value, if this is returned to a refiner, it must be considered as "recycled".</i>	CIBJO	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?	<i>Yes, suggestion above. The definition needs to align with other organisations such as CIBJO and LBMA.</i>	CIBJO	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is there any additional information you feel is needed in the CoC guidance to provide further clarity on recycled and reprocessed requirements?</p>	<p><i>Please consider this definition as being proposed by ISO:</i> <i>Recycled gold</i> <i>Pre-consumer recycled gold, post-consumer recycled gold, or a mixture of both</i></p> <p><i>1: Pre-consumer recycled gold</i> <i>Gold obtained by refining scraps and materials generated during a manufacturing process, including material no longer required.</i> <i>Example : material arising from refining, manufacturing and fabrication such as production or melted scraps. Excess inventory of components.</i> <i>Note: This excludes investment gold products (bullion, bars, investment coins), except if those investment gold products have been produced exclusively from pre- and/or post-consumer recycled gold.</i></p> <p><i>2: Post-consumer recycled gold</i> <i>Gold obtained by refining materials sourced from individuals, organisations or industrial facilities in their role as end-users of the product, which may no longer be required or may not be practical for its original purpose.</i> <i>Example : material arising from returned or exchanged jewellery products, electronic and industrial components, dental waste, numismatic/collectable coins (but not investment coins), decorative products, plated materials/coatings...</i> <i>Note: This includes returns of defined material through the supply chain from refinery to retail.</i> <i>Note 2: This excludes investment gold products (bullion, bars, investment coins), except if those investment gold products have been produced exclusively from pre- and/or post-consumer recycled gold.</i></p>	<p>CIBJO</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
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<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?</p>	<p><i>RJC must not adopt the PMIF definition of recycled and reprocessed gold, we strongly recommend that the existing definitions are sufficient even though there are minor differences. The 2% threshold PMIF propose isn't. if RJC wish to address the issue of conversion of bars from non-members that should be addressed via alternative means . At the bare minimum RJC must align with OECD. Additionally there is an ISO committee looking into definitions of "recycled gold" so it would be both sensible and pragmatic to await the outcome of this before any changes are made</i></p> <p><i>Existing Definitions:</i></p> <p><i>OECD</i> <i>RECYCLABLE GOLD – Gold that has been previously refined, such as end-user, post-consumer and investment gold and gold-bearing products, and scrap and waste metals and materials arising during refining and product manufacturing, which is returned to a refiner or other downstream intermediate processor to begin a new life cycle as „recycled gold“. The origin of Recyclable Gold is considered to be the point in the gold supply chain where the gold is returned to the refiner or other downstream intermediate processor or recycler. Sub-categories of recyclable gold are:</i> <i>Unprocessed recyclable gold – Recyclable Gold still in its original form and/or fabrication scrap, before it has been returned for processing and refining (e.g. bullion bars, pieces of jewellery, ornaments, coins, machine turnings, etc.)</i> <i>Melted recyclable gold - Recyclable Gold which has been melted as the first recycling process and cast into rudimentary bars or some other form with undefined dimensions and variable fineness.</i> <i>Industrial By-product – a material produced while processing another material, not the primary intended product but nevertheless a separate useful material. For example, gold refining often creates low value by-products such as furnace flue dust, spent crucibles and floor sweepings.</i></p>	<p>Simon Houghton- Dodd, Asahi Refining</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
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		<p><i>LBMA</i> <i>Recycled Gold: This term traditionally encompasses anything that is gold-bearing and has not come directly from a mine in its first gold life cycle. In practical terms, it relates to gold sourced by an LBMA refiner, or downstream intermediate processor, including end-user, post-consumer products, scrap and waste metals, and materials arising during refining and product manufacturing, and investment gold and gold-bearing products which are returned to a Refiner to begin a new lifecycle. This category may also include fully refined gold that has been fabricated into grain, Good Delivery bars, medallions and coins that have previously been sold by a refinery to a manufacturer, bank or consumer market, and that may thereafter need to be returned to a refinery to reclaim their financial value or for transformation into other products (e.g., 1 kilo bars).</i></p> <p><i>Responsible Jewellery Council</i> <i>Recyclable Materials: Precious metals that have been previously refined (including end-user, post-consumer materials, precious metal-bearing products, and scrap and waste metals and materials arising during product manufacturing) and then returned to a refiner or other downstream intermediate processor to begin a new life cycle as 'recycled material'</i></p> <p><i>Responsible Minerals Initiative</i> <i>Recycled material: Recycled materials defined by the OECD Guidance, and referenced by the US SEC are 'reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing including: excess, obsolete, defective, and scrap metal materials which contain refined or processed metals that are appropriate to recycle in the production of 3TG. As defined by the OECD Guidance, minerals partially processed, unprocessed, or a by-product from ore (i.e. slags) are not recycled materials. Under the SEC rule, recycled 3TG is deemed to be "DRC conflict free" and is equivalent to other sources of 3TG for SEC reporting</i></p>		
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		<p><i>purposes. If a reasonable inquiry confirms that material is derived from recyclable material, its use does not trigger an obligation to file a CMR.</i></p>		
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Provision 5 - Eligible Recycled and Reprocessed Material	Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?	<i>See above, I've spoken to 6 other large RJC member refiners and we all agree of my position on questions 25 & 26. I appreciate RJC's "end consumer" is a member of the public but they are a small minority of gold consumers and if RJC insist on this path major refiners and also producers (see Pandora's recent statement https://www.miningweekly.com/article/worlds-biggest-jeweller-pandora-stops-using-mined-silver-and-gold-2024-01-29) will only confuse the market.</i>	Simon Houghton-Dodd, Asahi Refining	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is there any additional information you feel is needed in the CoC guidance to provide further clarity on recycled and reprocessed requirements?	<i>I propose the alternative definitions and categories of recycled gold which align with OECD and clearly differentiate between sources:</i> <ul style="list-style-type: none"> • <i>Unprocessed Recyclable Gold – Unmelted recycled gold such as scrap jewellery or unmelted electronic/industrial waste.</i> • <i>Melted Recyclable Gold – any form of melted recycled gold that is not high purity refined bullion bars. For example, jewellery scrap or electronic/industrial waste either in pieces or as melted in rudimentary bars</i> • <i>Mixed Materials – a rudimentary bar that is a mix of mined (LSM and / or ASM) and recycled gold less than 99.5% and is automatically defined as high risk.</i> • <i>New Category: Investment Gold – High purity refined bullion bars, grains or coins regardless of the source of the gold which could include LBMA/RJC/RMI and non LBMA/RJC/RMI refiners and (intermediate refiners).</i> 	Simon Houghton-Dodd, Asahi Refining	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?	<i>As has been discussed many times with a very broad range of industry stakeholders, including the RJC, CIBJO, WGC, LBMA, and refining and assaying organisations, the Precious Metals Impact Forum (PMIF) definition does not reflect current industry practice, will not form the basis for enhanced good practice in responsible sourcing, and has been deemed unworkable by key supply chain actors, both upstream and downstream. Adopting a definition that has been rejected by a range of industry bodies and experts would risk fragmenting the standards landscape and introduce incompatibilities and partial views that could inhibit industry good practice in supply chain due diligence and transparency.</i>	World Gold Council	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is there any additional information you feel is needed in the CoC guidance to provide further clarity on recycled and reprocessed requirements?</p>	<p><i>It needs to reference / arrive at a definition that industry, refining and supply chain experts view as reflecting good practice whilst encouraging greater clarity and transparency in gold flows and sourcing. Something along the lines of the following offers a more practical guidance on categorising Recycled Gold'</i></p> <p><i>Recycled gold = Pre-consumer recycled gold, post-consumer recycled gold, or a mixture of both.</i></p> <p><i>Note: Recycled gold excludes investment gold products (bullion, bars and investment coins), unless such investment gold products have been produced exclusively from recycled gold as defined below:</i></p> <p><i>Pre-consumer recycled gold: Gold obtained by refining scraps and materials generated during a manufacturing process. Example : material which is re-refined arising from refining, manufacturing and fabrication such as melted scraps, sweeps, solutions, wastewater treatments, etc. or manufactured materials, components or alloys which are no longer required or which can no longer be used for their original purpose. Note:: scraps and materials refined within the organisation which generated them cannot qualify as pre-consumer recycled gold, except if all the starting material used in the process was already pre-consumer recycled gold.</i></p> <p><i>Post-consumer recycled gold: Gold obtained by refining materials sourced from individuals, organisations or industrial facilities in their role as end-users of the product which is no longer required/desired or can no longer be used for its original purpose. Example : material arising from returned or exchanged jewellery products, electronic and industrial components, dental waste, numismatic/collectable coins (but not investment coins),</i></p>	<p>World Gold Council</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
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		<p><i>decorative products, plated materials/coatings etc.</i></p> <p><i>Note: This includes returns of defined material by participants in the gold supply chain (e.g. excess inventory from manufacturers, wholesalers, retailers etc.)</i></p>		
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<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?</p>	<p><i>“Recycled gold” is gold in any form which does not come directly from a mine in its first supply chain, is returned to a refiner or other downstream intermediate processor, and which has verifiable provenance from defined pre- and/or post-consumer sources, as defined below;</i> <i>“Recycled gold” may only be from the following sources;</i></p> <p><i>1: Pre-consumer and manufacturing waste or scrap: e.g. material arising from refining, manufacturing and fabrication, such as production or melted scraps, sweeps, solutions, wastewater treatments etc. This also includes previously refined and fabricated gold used as primary material for manufacturing from identified sources, e.g. grain and pellets.</i></p> <p><i>or..</i></p> <p><i>2: Post-manufacturing and consumer waste or exchange: e.g. material arising from returned or exchanged jewellery products, electronic and industrial components, dental waste, numismatic/collectable coins (but not investment/bullion coins), decorative products, plated materials/coatings, etc.</i></p> <p><i>“Recycled gold” excludes investment gold products (bullion, bars, coins), except investment gold products which can be verified as being refined and produced only from one or both of the recycled sources defined above.</i></p> <p><i>Gold refineries must have policies & procedures in place to verify that the “Recycled gold” conforms to one or both of these sources and does not originate directly from a mine.</i></p> <p><i>“Recycled gold” should be verified as “recycled” from accredited gold refinery identified by a credible industry scheme/standard (e.g. by LBMA GD, RJC CoC, RMI RMAP).</i></p>	<p>World Gold Council</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
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Provision 5 - Eligible Recycled and Reprocess ed Material	General	<p><i>We should look at ISO TC/174 because they are currently working on a definition for recycled gold by mid 2026. We should wait for them. We should have a universal definition because it is not rational to have a fragmented definition for different metals. We cannot support the PMIF proposal as they are introducing new wording like reprocessed which we cannot find in regulations at EU or UN level. We are also missing the concept of pre and post consumer and also the threshold is questionable and based on customs rules.</i></p> <p><i>We want to have a coherent approach at all levels and I have never found reprocessed at any EU legislation, OECD guidance or LBMA. So it is absolutely new concept. On thresholds its going to customs rules. It runs the risk of rejecting material like end of life jewellery.</i></p>	Zinaida Nazarenko , European Precious Metals Federation (EPMF)	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	General	<p><i>There are already some differences in definitions between LBMA, RJC and RMI, this moves RJC even further away. We are RJC and LBMA approved. I would be categorising the same material in 2 different ways for 2 different certifications. I think moving away from OECD wording which this does is not helpful. If the objective is to get away from greenwashing, you know conversion of non- RJC approved bars to RJC bars why don't you just introduce a new category, converting investment bars. I just don't think the PMIF definition is helpful and I don't understand where this 2% rule comes from and it just muddies the waters further. Consultation with RMI and LBMA would be useful. As a group what materials go through RJC certification is a minor percentage of the metal we process annually. So when you talk about downstream customers, the financial and street banks are huge customers so getting them on board with definitions is crucial to us.</i></p>	Simon Houghton-Dodd, Asahi Refining	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	General	<p><i>I want to support the arguments made. We will have difficulty applying the definition and will have difficulty applying that definition downstream.</i></p>	Olivier Demierre, MKS PAMP SA	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the

				topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	General	<i>It is clear that we have a lot of problem with the term in the industry. The RJC has tried to move forward here. I think we are at a good moment where we have to change. I do not understand what the problem is with implementation, you will have to use another word. I don't understand how it is difficult to apply, and it is clear the 2% has come from the customs.</i>	Marc Ummel, SWISSAID	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	General	<i>We welcome the conversation on making the definition more clear. There is a well thought idea of the UNEP, which defines recycled, remanufactured and recovered metals. This definition is based on the end of life concept. Everything that is end of life is eligible for recycled. Doesn't apply for broken jewellery or gold bars. Does apply for industrial scraps. We feel this definition is significantly clear and is clear for the public. There is a difference between RJC, LBMA and ISO. If you wait until ISO has finished it may lead to the LBMA changing etc. For us it is important to have an aligned standard for all precious metals which would ease life for refiners as why should we treat other precious metals differently to gold and silver. We welcome more clarity but would encourage introducing post and pre consumer concept which in the UNEP is remanufactured and recovered and on the other side introduce the end of life concept. we can discuss whether the 2% and the naming is the right concept or whether it would be better to go for a UNEP concept. The rules are very clear it is not a case of the definition being clear. Is the concept in general the right one? This definition doesn't take into account end of life concept. A change to this definition came from downstream customers. There are different</i>	Dr Robin Kolvenbach, Argor-Heraeus SA	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

		<i>interests' levels from different players which means having an aligned definition is difficult. Waiting for the ISO group to be finished in 2026 is too late and the pressure is coming in now.</i>		
Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>We strongly advise to consider the definition carefully. It is important to always take into account the social impact this definition will bring to those in artisanal and small scale mining.</i>	Gina D'Amato, Association for Responsible Mining	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>Is there more context for why the current definition is being kept for PGM and Silver?</i>	SCS Global Services	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

Provision 5 - Eligible Recycled and Reprocess ed Material	General	<i>When we try to sell reprocessed metal we will be asked by our customers why it isn't recycled? What would be a clarification point for our customers when selling to them. We are 100% recycled in SCS global, do we have to go through another process to become recertified?</i>	Mike Mikolay, United Precious Metals Refining, Inc	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	General	<i>These definitions lack clear rationale just because they are duties explanations doesn't mean there is a technical application. I do not support this definition</i>	Franz- Jozef Kron, Agosi AG	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess ed Material	General	<i>The PMIF definition is based on customs rules and is a different context and doesn't reflect the reality of jewellery. How will the PMIFs definition of recycled gold help improve issues around illicitly mined ASM gold?</i>	Eduard Stefanescu , C.HAFNER GmbH + Co. KG	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocess	General	<i>There are not enough sources of material that you can process under 2% to give it the term recycled. Never once has a customer asked where the metal comes from. The term recycling has been used for 10-15 years and I don't see why the definition should be changed. We will not be able to come up with enough metal to process under the new definition.</i>	David Siminski, United Precious Metal	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this

ed Material			Refining, Inc	provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>I don't think because the consumers are not asking for it is a reason not to do it. I don't like the definitions too much, but the current definition does not function. Under the US definition absolutely no gold should be called recycled because it is not intentionally diverted away from a waste stream.</i>	Sara Yood, Jewellers Vigilance Committee	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>There is a lot of artisinally mined gold that is being mind illicitly and on indigenous territories is circumventing legal channels and is falling into recycled gold supply chains and is a huge challenge to strengthen controls around recycled gold. RMI not on board with the PMIF approach as our approach is enshrined in OECD due diligence and would like the RJC to do the same. Reprocessed can provide another layer of confusion for customers and jewellers.</i>	Maggie Gabos, RMI	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.

<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?</p>	<p><i>Metallor's management does not agree with the new definition of eligible recycled gold and eligible reprocessed material .</i></p> <ol style="list-style-type: none"> <i>1. Not in line with market and technical practices in refineries (No possibility for most LBMA refiners to refine in a segregated way this type of material. Such material, containing <2% of gold, must be sent to smelters prior of arriving at a refinery. During the smelting process, materials from multiple sources and multiple fineness are mixed to generate lots of typically 10-60 tons – and some sources will always contain more than 2% of gold. There is no possibility for a refiner to receive a smelted material which was only generated from sources containing <2% of gold. Furthermore, the gold concentration delivered to the refiners after smelting is always significantly higher than 2%.</i> <i>2. Not in line with OECD definition.</i> <i>3. Not in line with LBMA definition.</i> <i>4. We recommend the RJC to wait that the ISO working group to finalize the new definition of recycled material before to modify it (RJC is part of this working group).</i> <i>5. Difference in “recycled” definition with other metals Ag, Pt, Pd, which will lead to a lot of confusion in the customers’ mind. With such proposed definition, Metallor Technologies would virtually not be able to produce any RJC “recycled gold”.</i> 	<p>Marco Pisinio, Metallor Technolégies SA</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>
<p>Provision 5 - Eligible Recycled and Reprocessed Material</p>	<p>Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reprocessed?</p>	<p><i>The ISO/TC 174 technical committee in charge of "Jewellery and Precious Metals" is currently working on a set of standards which will include a definition of "Recycled Gold". 43 countries are currently participants or observers at this technical committee, joined by several liaison organizations including RJC. While the work is not finalized, a very large majority of experts have already decided to reject a definition which would only allow using the word "recycled" for a tiny fraction of the secondary (non-mined) gold, like the one proposed in the Round 2 Draft Standard. By selecting such definition, RJC would not only move away from a possibility to use an unified definition in our industry (a goal currently supported by multiple organizations), but also would provide an inapplicable definition to the market. The proposed definition is going against the concept of recycling as</i></p>	<p>Jonathan Jodry, ISO/TC 174</p>	<p>Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.</p>

		<i>described in the ISO 14000 family of standards (which is used by many companies worldwide), especially ISO 14021. As a result, gold would be the only metal which would essentially become un-recyclable.</i>		
Provision 5 - Eligible Recycled and Reprocessed Material	General	<i>Metalor is not supporting the new sections incur incorporated in the "new" definition of the Recycled material. Generally speaking those new categories would not be regarded as recycled material by Metalor customers and as far as new section c) it is clear for Metalor that we are talking about mining and not recycled material . Therefore, Metalor advocates to keep the definition of recycled material as it is today with no additional change.</i>	Marco Pisnio, Metalor Technoléo gies SA	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5 - Eligible Recycled and Reprocessed Material	Is further guidance required on the appropriate description of recycled and reprocessed materials, particularly for the end consumer?	<i>The proposed definition will essentially create a lot of confusion for end consumers, with for example a 18-karat gold watch containing 75% gold and 25% leading to gold which cannot be called recycled, but silver which can !</i>	Jonathan Jodry, ISO/TC 174	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5.1 - Eligible Recycled and Reprocessed Material	General	<i>Use the term "re-traité" instead of "reconverti"</i>	BJOP	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry. We will ensure that the eventual French translation is cross-checked prior to issue.

Provision 5.1 - Eligible Recycled and Reprocessed Material	General	<p><i>Knowing that:</i></p> <ul style="list-style-type: none"> • ISO has launched the development of a standard about responsible precious metals and the definition of recycled gold; • RJC representatives participate in this development; • This project is a 3-year project and is supposed to finish during Summer 2026; • Basically, most of the participants in the ISO working group request that all actors in the gold supply chain use the same definition for recycled gold, expecting ISO to be the reference; We ask that the current RJC definition be maintained while waiting for the release of the ISO standard to avoid ISO and RJC having divergent definitions. <p><i>This will avoid the situation where if ISO ends up with a definition different from the one currently proposed by the RJC, the RJC would then have to reconsider its definition in 2026 and launch a new revision of the standard taking into account the ISO definition, or work on another definition if necessary.</i></p>	Richemont International SA	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 5.4 - Eligible Recycled and Reprocessed Material	General	Remove "reprocessible" see row 129	Richemont International SA	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Provision 6 - Eligible Grandfathered (Legacied) Material	General	<i>In the context of grandfathered or legacied materials, refer to them as "gold without origin". No matter what name is used to cleanse the image of this material, its origin remains unknown. It could be associated with, for example, the Holocaust, making it impossible to determine definitively.</i>	Andres Castellanos, Fairalloy	Thank you for your comment. We remain open to suggestions for appropriate terminology but believe that there is broad consensus for this term.

Provision 6 - Eligible Grandfathered (Legacied) Material	General	<i>I am not in favour of the term "legacied" and prefer to keep the term "Grandfathered" as the word "legacy" is linked to "legality". Grandfathered gold origin is unknown and even if legal, its provenance could have been illegal at one stage. "Grandfathered" is an acceptable consensus for an unknown origin gold.</i>	Patrick Shein, Gold by Gold	Thank you for your comment. The term "legacied" has been proposed and this is also being actively considered by other aligned standards. We will ensure that whatever term is eventually selected is aligned to other recognised standards and clearly defined. The term grandfathered is perceived as racist in some territories and we therefore are looking to rephrase this term.
Provision 6 - Eligible Grandfathered (Legacied) Material	General	<i>We consider it would make sense to now remove this type of material from the COC standard as it reduces significantly the credibility of the RJC COC material.</i>	Olivier Demierre, MKS PAMP SA	Thank you for your comment. The RJC CoC Standard is aligned with the OECD in accepting this type of material and does not intend to exclude it at this stage.
Provision 6 - Eligible Grandfathered (Legacied) Material	General	<i>RMI are in broad agreement and next time our Gold Standard is up for review we will align with the RJC and use legacied.</i>	Marianna Smirnova, RMI	Thank you for your comment and support for this change.
Provision 6.1 - Eligible Grandfathered (Legacied) Material	General	<i>OK, Note: The current version of COC standard (nov 2019) mentions the dates for silver and PGM => no changes are needed</i>	Richemont International SA	Thank you for your comment.
Provision 6.1 - Eligible Grandfathered (Legacied) Material	General	<i>In English, the term "legacied" may cause confusion; it would be preferable to find a term not associated with the legal notion or consider keeping "grandfather."</i>	BJOP	Thank you for your comment. The term "legacied" has been proposed and this is also being actively considered by other aligned standards. We will ensure that whatever term is eventually selected is aligned to other recognised standards and clearly defined. The term grandfathered is

				perceived as racist in some territories and we therefore are looking to rephrase this term.
Provisions 7 Eligible Material Declarations & 8 Shipments and Transfer Documents	General	<i>Explanation: Service companies should be treated as outsourced subcontractors. Not all companies, even if COC certified, are interested in pursuing the chain of custody for every shipment they receive. In this case, the standard should not require a transfer document, which is often a reason for increasing the selling price of the material by the vendor.</i>	Richemont International SA	Thank you for your comment. The RJC will look further at the requirements for service companies to ensure the provision is not creating unintended consequences.
Provision 7 - Eligible Material Declarations	General	<i>Service companies should be treated as outsourced subcontractors.</i>	Andres Castellanos, Fairalloy	Thank you for your comment
Provision 7 - Eligible Material Declarations	General	<i>The word grandfathered or legacied typically means it is not owned by me. I would prefer to use the word preowned.</i>	Suhas Risbood, ISOQAR (India) Pvt. Ltd	Thank you for your comment. The term pre-owned does not have the same meaning and does not have the same recognition by other standards. Grandfathered is already in widespread use in this area and we understand that other initiatives will also be moving to use the term "legacied" to remove any racist connotations.

Provision 8 - Shipments and Transfer Documents	General	<i>For the sake of clarity, we propose to rephrase the provision 8.2 as follow: "The entity shall ensure that a CoC transfer document accompanies and, whenever possible, is physically attached or as a minimum digitally linked to each shipment or transfer of CoC material dispatched to other certified entities, or certified service companies or service companies included in the certification scope of the issuing entity."</i>	Leo Daguet, LVMH W&J	Thank you for your comment. However, this would conflict with the current 8.1 "Where the member retains ownership but is sending components to outsourced contractors, the use of the transfer document may be suspended as long as the details are recorded and traceable in the member's internal systems." This change has been made to formalise the current practice in place since August 2021 to avoid the administrative burden of transfer document issue where they do not serve a specific purpose.
Provision 8 - Shipments and Transfer Documents	General	<i>There should be an allowance for companies to use their own forms as long as the necessary information is captured</i>	Simon Houghton-Dodd, Asahi Refining	Thank you for your comment. Indeed the proposed CoC wording allows members to use their own formats. The annex is given as a template to specify the data required but the specific format is not mandatory.
Provision 8.1 - Shipments and Transfer Documents	General	<i>Move this point after the other 3 for better logical flow in CoC requirements. Add service companies.</i>	BJOP	Thank you for your comment. We will revise the Standard accordingly.
Provision 8.2 - Shipments and Transfer Documents	General	<i>Remove "as a minimum" to treat the paper and digital documents equally, ensure the reliability and security of the information system supporting the digital transfer document</i>	BJOP	Thank you for your comment. The term "as a minimum" can be removed. Requirements to ensure the validity of the data and system will be added to the standards guidance.

<p>Provision 8.1 - Shipments and Transfer Documents</p>	<p>General</p>	<p><i>For better reading, should be 8.4</i></p> <p><i>Where the member retains ownership but is sending components to outsourced contractors or service companies, either certified or not, the use of the transfer document may be suspended as long as the details are recorded and traceable in the member's internal systems.</i></p> <p><i>Explanation:</i> <i>Outsourced subcontractors and service companies must be treated the same way. The disposition must apply to outsourced contractors or service companies, either certified or not</i></p>	<p>Richemont International SA</p>	<p>Thank you for your comment. The Standard will be modified accordingly.</p>
<p>Provision 8.2 - Shipments and Transfer Documents</p>	<p>General</p>	<p><i>For better reading, should be 8.1</i></p> <p><i>The entity shall ensure that a CoC transfer document accompanies each shipment of CoC material dispatched to other certified entities willing to continue the COC, and, wherever possible, is physically attached and/or digitally linked to the shipment.</i></p> <p><i>Explanation:</i> <i>Not all companies, even if COC-certified, are interested in pursuing the chain of custody for every shipment they receive. In this case, the standard should not require a transfer document, which is often a reason for increasing the selling price of the material by the vendor.</i> <i>Now, in 2024, more and more documentation is digitalized => It is no longer legitimate to prefer paper => "digitally linked" should be put at the same level as "physically attached"</i></p>	<p>Richemont International SA</p>	<p>Thank you for your comment.</p> <ul style="list-style-type: none"> - the order of the points has been noted and will be updated. - the point about "willing to continue the CoC" is inferred as not issuing a Transfer Document will automatically cease the CoC. The RJC does not believe that it is necessary to include this in the provision, but the Guidance Document will be updated to make it clear that these can be suspended where the CoC is being halted - the phrase "as a minimum" will removed to make it clear that paper or digital records are seen as equal
<p>Provision 8.3 - Shipments and Transfer Documents</p>	<p>General</p>	<p><i>For better reading, should be 8.2</i></p>	<p>Richemont International SA</p>	<p>Thank you for your comment. The provisions are being re-ordered.</p>

Provision 8.4 - Shipments and Transfer Documents	General	<i>For better reading, should be 8.3</i>	Richemont International SA	Thank you for your comment. The provisions are being re-ordered.
Provision 9 - Product Claims and Intellectual Property	General	<i>They should rethink the name of the "Chain of Custody" standard for reprocessed and grandfathered gold.</i>	Andres Castellanos, Fairalloy	Thank you for your comment. The RJC does not intend to rename the standard at this stage, but will ensure that the finalised provision provides clear descriptions of the type of CoC to enable downstream companies and consumers to make informed choices.
Provision 9.2 - Product Claims and Intellectual Property	General	<i>"Specify the list of small non-CoC components to exclude from the declaration (Table 13 of the CoC guide). Define the concept of 'a small part of the weight and overall volume of the article' in %"</i>	BJOP	Thank you for your comment. This will be reviewed as part of the update of the Standards Guidance
Provision 10 - Return and Reintegration of CoC Material	General	<i>I hope this is not a new excuse for gold washing.</i>	Andres Castellanos, Fairalloy	Thank you for your comment. The RJC does not support any form of "gold washing" and seeks to ensure that there is transparency on the type of materials included to allow downstream companies and consumers to make informed decisions.

<p>Provision 10 - Return and Reintegration of CoC Material</p>	<p>General</p>	<p><i>In case CoC products Gold bar are requested to be returned by downstream manufacturer(customers) when the products has already been processed by the downstream manufacturer(customers) and the identification number on the gold bar (products) cannot be recognised, or if the product does not match the product that was shipped, it is suggested that members should have the right to refuse the request under these situations.</i></p>	<p>Aki Kuwayama , ASahi METALFIN E, Inc</p>	<p>Thank you for your comment. Provision 10.1 already requires that material can only be returned if traceable and there has been no risk of contamination. Thus the material as described by you would not be eligible for reintegration. RJC will ensure this is reinforced in the guidance document.</p>
<p>Provision 10.2 - Return and Reintegration of CoC Material</p>	<p>General</p>	<p><i>In the event that all or part of a shipment <u>sold to a customer</u> is returned <u>by the customer</u>, the member must verify that the material is the same and retain records of the checks made which will include:</i></p> <p><i>Explanation: To make it clear that this disposition does not apply to materials returned after subcontracted operations or after having been passed on to service companies</i></p> <p><i>Guidance: For B to B relation: compliance with this disposition may be highly simplified in the case of products made with one single component and stamped with a unique serial number</i></p> <p><i>For finished products shipped outside the organization of the member, either to retailers or final customers, the COC status will no longer apply when returned, except in the case of finished products made with one single component and bearing a unique serial number.</i></p> <p><i>Reason: not possible to detect if a component has been removed from the product and exchanged with a non-COC one.</i></p> <p><i>Exception: return of unsold inventory from COC-certified retailers</i></p>	<p>Richemont International SA</p>	<p>Thank you for your comment. To meet the intent of your comment the provision will be amended to ensure that it is clear that this only applies where ownership of the material has passed to a counterparty and the same counterparty is returning it.</p> <p>In relation to the guidance this will be covered in the amended document.</p>

Provision 10 - Return and Reintegration of CoC Material	General	<i>This entire clause refers to the return of sold material (not sub-contracted) so the terminology in 10.1 to 10.4 should be modified to avoid any confusion</i>	BJOP	Thank you for your comment. We will review the wording to ensure that this is clear.
Provision 10.2 - Return and Reintegration of CoC Material	General	<i>"Specify the list of small non-CoC components to exclude from the declaration (Table 13 of the CoC guide). Define the concept of 'a small part of the weight and overall volume of the article' in %"</i>	BJOP	Thank you for your comment. This will be reviewed as part of the update of the Standards Guidance
Provision 10.3 - Return and Reintegration of CoC Material	General	<p><i>Returns from a COC certified member shall be clearly documented with the reference of the original transaction, together with a warranty that the material has been in the physical possession of the entity making the return from the time of the original consignment until the point of return and, wherever possible, accompanied by a transfer document.</i></p> <p><i>Explanation:</i> <i>Quality returns to suppliers are day-to-day activities for the industry. Imposing the issue of a transfer document would significantly increase the workload for the certified entity returning the goods. As the responsibility for identifying the returned product as COC or non-COC lies with the receiver, simply providing him with the details of the original shipment (invoice number, delivery note, transfer document number, etc.) would enable him to make this identification.</i></p>	Richemont International SA	Thank you for your comment. The Standard will be amended accordingly.
Provision 10.4 - Return and Reintegration of CoC Material	General	<p><i>For returns from a non-COC certified member, only products made with one single component and bearing a unique serial number can be returned as COC products. In this case, the member must apply the checks above, etc...</i></p> <p><i>Explanation:</i> <i>Reason: not possible to detect if a component has been removed from the product and exchanged with a non-COC one.</i></p>	Richemont International SA	Thank you for your comment. The Standard will be amended accordingly.

Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>LBMA's RGG and RSG</i>	Eduard Stefanescu , C.HAFNER GmbH + Co. KG	Thank you for your comment.
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>Only third party standards should be recognized by RJC for credibility reason.</i>	Patrick Shein, Gold by Gold	Thank you for your comment.
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>We have not found such a list. LBMA and RMI should obviously be included.</i>	Olivier Demierre, MKS PAMP SA	Thank you for your comment.
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>We would encourage the expansion of this category of eligible material to include mines that meet the CRAFT Code and any possible future assurance schemes that align with OECD Due Diligence Guidance for responsible minerals sourcing.</i>	Ana Brazaityte, Christina T Miller Sustainable Jewelry Consulting	Thank you for your comment.
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>I would like to put forward SLCP and CRAFT for benchmarking and mutual recognition</i>	Anonymous	Thank you for your comment.
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>SBGA, FAIRMINED, PXIMPACT</i>	Leo Daguet, LVMH W&J	Thank you for your comment.

<p>Benchmarking and cross harmonisation</p>	<p>Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?</p>	<p><i>As the CoC standard is currently written, a possible recognition of certifications or due diligence schemes might open the door to facilitating legitimate ASM to enter RJC CoC supply chains. Since neither requirement 4.1.c nor 4.1.d define the minimum performance for ASM, it therefore seems they could be used to include more entry-level ASM in the CoC, provided that robust and OECD alignment due diligence is carried out.</i></p> <p><i>However, to have a credible benchmark of standards, implementation, and assurance processes of different certification schemes and initiatives, it is important to have clarity of the criteria of the benchmark, and minimum conditions regarding the robustness of the standard-setting and assurance process.</i></p> <p><i>4.1 c. ASM certified under an RJC-recognised responsible ASM standard</i></p> <p><i>-What are the criteria for a standard-setting process for a standard to be considered by the RJC as legitimate and therefore recognised?</i></p> <p><i>-In terms of minimum compliance, what is RJC's take on the minimum requirements for ASM. Is OECD Annex II risks a departure point or would RJC go beyond that?</i></p> <p><i>-The requirement relates to "ASM certified". In terms of assurance, are 3rd party audits by ISO-certified auditors a must? Or do you think there might be space for more flexible due diligence and verification set-ups if aligned with the OECD-recommended assurance process?</i></p> <p><i>4.1 d. Mines subject to RJC-accepted "responsible mining assurance scheme"</i></p> <p><i>How are the "mining assurance schemes" different from 4.1d "ASM certified under responsible ASM standard". Do the assurance schemes need to be oriented by a legitimate standard?</i></p> <p><i>Is there a list of schemes currently accepted, in a way there exists a</i></p>	<p>Marcin Piersiak, Alliance for Responsible Mining</p>	<p>Thank you for your comment. These points will be important for discussion in the ASM working group.</p> <p>The RJC will also benchmark the CRAFT Code for potential inclusion in the recognised standards.</p>
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		<p><i>list of cross-recognised standards initiatives?</i></p> <p><i>ARM would like to recommend the inclusion of the Craft Code standard in the benchmark exercise for the following reasons:</i></p> <ul style="list-style-type: none"> <i>- It attempts to define the earliest possible entry-level engagement with the ASM, following the requirements of the OECD guidance (obligatory application), and identifying other high risks for ASM that can be progressively mitigated.</i> <i>- It has been an open-source, collaborative cross-industry multi-stakeholder process, involving most of the key players in terms of responsible sourcing ecosystem, including the RJC.</i> <i>- It has undergone an OECD Guidance alignment exercise and has almost closed the gaps identified with the 2.1 version update.</i> <i>- It is already recognized by the Responsible Minerals Initiative I as an Upstream Assurance Mechanism standard, following the successful OECD alignment assessment. This could facilitate cross-recognition and adoption by the RJC.</i> <i>- Version 2.1 also includes recommendations on the application of the Craft Code for purposes of due diligence and assurance. These (open-source) recommendations could also be used by the RJC to ensure that different initiatives that facilitate creation and due diligence at the upstream level of the supply chains are in observance of the OECD Guidance, which the RJC also requires from its members.</i> 		
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Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>We strongly recommend companies adopt certification frameworks and initiatives that include environmental safeguards in conjunction with human rights due diligence. For companies sourcing ASM gold from the Amazon and other forest ecosystems we suggest adherence to the forest-smart mining principles developed by the World Bank and available as a bolt-on standard from ARM. To support miners in transition towards responsible operations, we suggest planetGOLD's criteria for socially and environmentally responsible operations, which combines CRAFT Code with the elimination of mercury, respecting Indigenous rights, and minimizing impacts to biodiversity. Finally, we recommend that companies incorporate OECD's recently published Handbook on Environmental Due Diligence in Mineral Supply Chains to embed environmental considerations into their mineral supply chain due diligence procedures.</i>	Charlie Espinosa, Amazon Aid	Thank you for your comment. Environmental due diligence and related controls form part of the COP standard which is currently under review. We welcome these comments as part of this consultation which will be soon, and have been noted. RJC will also consider these suggestions as part of our ASM working group.
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>Fairmined Certified Gold and Silver Fairtrade Certified Gold and Silver Fairmined Certified Suppliers Fairtrade Licensed Suppliers</i>	Desirée Binternage I, Fairever GmbH	Thank you for your comment
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>RMI & LBMA</i>		Thank you for your comment
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>Benchmarking: ISO 45001 occupational health and safety management, SA8000 social accountability, Fairtrade, Fairmined, SBG Swissbetter gold, SCS 007 Jewelry Sustainability Standard Serie, EPRM, PPA, RAGS, Just Gold, IPIS, Alliance for Responsible Mining (ARM) Craft standard, Artisanal Gold Council, Better Gold Initiative, DELVE</i>	Assurance Services International	Thank you for your comment
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>WGC Responsible Gold Mining Principles</i>	World Gold Council	Thank you for your comment

Benchmarking and cross harmonisation	General	<i>I would recommend looking at CRAFT Standard which is something RMI recognises for ASM. Using CRAFT is more achievable at entry level than something like Fairmined which is more focused on best in class. Other LSM level assessments like IRMA. For RMI's scope has expanded over the past couple of years beyond fine refiners level assessments to crude refiners and aggregators that source ASM. Historically we have focused on due diligence but now ESG is very much part of our standards. Coppermark is another good initiative although it doesn't audit primarily gold they do as a by-product.</i>	Marianna Smirnova, RMI	Thank you for your comment.
Benchmarking and cross harmonisation	Are there any certification frameworks or initiatives you would like to put forward for benchmarking and mutual recognition?	<i>PX Impact[®] Initiative based on ASM gold sourcing through processing plant (intermediate refiner)</i>	Christophe Nicolet, PX Précinox S.A	Thank you for your comment.
Legitimate ASM	Are there any additional areas this workstream should focus on	<i>Taking into consideration the ESG principles and UN's SDGs, RJC should also seek dialogue with academia in order to better understand negative environmental impacts, such as CO2 emissions from ASM. The sector communicates better practices and improvement on ESG efforts but clearly lacks scientific data from ASM.</i>	Eduard Stefanescu , C.HAFNER GmbH + Co. KG	Thank you for your comment. This will be an important topic for the ASM working group to look at.
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>I would recommend ARM, they have done work to provide OECD training to ASM cooperatives, which is beneficial.</i>	Maggie Gabos, RMI	Thank you for your comment.
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>IMPACT is another good initiative to work with.</i>	Marianna Smirnova, RMI	Thank you for your comment.
Legitimate ASM	Are there any additional areas this workstream should focus on?	<i>I believe that it is important to accept legitimate ASM as defined by OECD DDG. However, any result should be included ASAP to the CoC standard and not await the next scheduled revision of the standard. For processing plants, to be responsible, it is important to guarantee that any decision on the standard should benefit or empower the miners and not the plant.</i>	Patrick Shein, Gold by Gold	Thank you for your comment. Once the RJC has outcomes from the ASM working group the CoC Standard can be amended without waiting for the next scheduled review.

Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>I understand that there will be a working group on ASM. It is important that the decision of this WG can be integrated into the CoC immediately after the process and not wait for the next revision as this one came after 7 years.... If this is not the case, I would urge to extend the ASM integration in this revision. Otherwise I agree with the ARM comments on this issue.</i>	Patrick Shein, Gold by Gold	Thank you for your comment. Once the RJC has outcomes from the ASM working group the CoC Standard can be amended without waiting for the next scheduled review.
Legitimate ASM	Are there any additional areas this workstream should focus on?	<i>We fully support the inclusion of ASM. As LBMA is trying to do, RJC would be welcome to consider how to implement for gold the notion of progressivity.</i>	Olivier Demierre, MKS PAMP SA	Thank you for your comment. This will be an important topic for the ASM working group to look at.
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>The RJC should consider including Swiss Better Gold, ARM and Fair Trade in the ASM workstream.</i>	Olivier Demierre, MKS PAMP SA	Thank you for the suggestions.
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>You should work with Alliance for Responsible Mining</i>	Ana Brazaityte, Christina T Miller Sustainable Jewelry Consulting	Thank you for the suggestion.
Legitimate ASM	Are there any additional areas this workstream should focus on?	<i>We advocate for broadening the scope of eligible materials in this category to encompass mines conforming to the CRAFT code and any potential future assurance schemes that align with the OECD Due Diligence Guidance for responsible minerals sourcing.</i>	Anonymo us	Thank you for your comment
Legitimate ASM	Are there any additional areas this workstream should focus on?	<i>The workstream should focus on transparency, traceability and impact and work with SBGA, ARM and CRAFT</i>	Leo Daguet, LVMH W&J	Thank you for the suggestions.

<p>Legitimate ASM</p>	<p>Are there any additional areas this workstream should focus on?</p>	<p><i>Previous comments on clear criteria for benchmarking the initiatives, and a recommendation to include the open-source, widely consulted Craft Code as such a tool for credibly implemented due diligence from “legitimate ASM”, also apply to this point.</i></p> <p><i>However, there are a couple of issues that are becoming key for the industry and should be defined in more detail: ASM collaboration with industrial mines, and the processing plants acting as aggregators from miners that concentrate on the exploitation stage only. They are often presented as “go-to” solutions for a wider ASM inclusion, however, they may represent several risks that have to be mitigated.</i></p> <p><i>1. ASM working on the concession of an industrial mine In this case, there already is a provision 4.1 b. relating to ASM on the concessions of RJC-certified mine. However, it is important to better understand what criteria are being applied. Are there any specific requirements that the ASM should comply with or is the participation in “formalization initiatives” enough? Is the due diligence only related to traceability, or if not, what is its scope? In terms of the CoC, would ASM gold in such a situation only be deemed as an “eligible source” where the gold is channelled through the RJC-certified entity or could the ASM sell independently into a CoC supply chain?</i></p> <p><i>2. ASM gold integrated by processing plants/aggregators</i></p> <p><i>Engagement with ASM through a “processing plants model” is generating a lot of interest, because of its potential to centralize the aggregation of small volumes of gold from individual ASM, sharing the due diligence responsibility with a locally established formal, industrial business, and applying processing technologies that reach very efficient levels of gold recovery, compared with methods traditionally used by ASM (that often include mercury).</i></p>	<p>Marcin Piersiak, Alliance for Responsible Mining</p>	<p>Thank you for your comment. These points can best be reviewed within the ASM working group to provide input for amendments to the CoC Standard.</p>
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		<p><i>However, listening to miners' testimonies about their relationships with this kind of facilities, there are red flags in terms of conditions proposed to (or sometimes imposed on) miners.</i></p> <p><i>Additionally, the industrial processing facilities should be regarded as a part of the wider mining process, and they should observe relevant industry standards. They should therefore be covered by the point 4.1.a (Mines that are within its CoC certification scope or in which holds a legal interest and where mines are within the CoC certification scope of another CoC certified entity", and be certified as a part of the RJC CoP Mining standard provisions, or other industrial mining standards recognized by the RJC.</i></p> <p><i>For example, IRMA has included the processing facilities in the scope of their updated standard which is currently under consultation. Apart from social and environmental requirements for processing facilities, chapter 3.6.4 on "Due diligence in Commercial Relationships with ASM" defines criteria relating to their interaction with ASM, including a requirement "Offers fair commercial terms to all ASM suppliers". However, the criteria to establish what "fair commercial terms" mean are not yet developed, and such an exercise could be of great benefit to guide the development of ASM supply chains involving processing plants as aggregators. This could be a great opportunity for a cross-industry standards collaboration, providing a clear set of expectations for supply chains involving such a setup. It would be key to include in the discussion miners from different countries and contexts who have experience interacting with the processing plants and could offer their point of view on how this could be a win-win solution.</i></p> <p><i>To conclude: to maintain a coherent, responsible value chain ASM tailor-made standards should be applied to the ASM, and industrial mining and processing standards should be applied to industrial scale facilities, even if they work with ASM. Additionally, the</i></p>		
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		<p><i>intersection of the two, aggregation of ore from ASM, provides both opportunities and risks, and clear safeguards are important.</i></p>		
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Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<p><i>It is important that RJC coordinates with and builds on advances of other work groups related to ASM, such as those by LBMA, RMI, IRMA, DMCC and others to ensure consistency across the board and avoid duplications. While building on other experiences with gold, RJC could also focus on defining the rules and a collective action plan for ASM of gemstones.</i></p> <p><i>In many of the discussions about ASM, the ASM direct representation has been absent. It would be important to try to include national-level ASM organizations, or committed ASM leaders, to ensure that ASM voices are directly integrated.</i></p> <p><i>EPRM and PPA are private-public partnerships that aim at supporting supply chains from responsible and legitimate ASM. Their membership is interested in ASM, and might want to be involved, both at the level of the secretariat and particular members.</i></p> <p><i>Finally, it is very important to ensure that the Working Group works within the framework of the current wording of the standard, through additional guidance, to avoid having to wait for another cycle of CoC revision. An agile and fast-track process, combined with an engagement and educational process with RJC membership and providers that can supply ASM gold, gemstones and diamonds, will be important for RJC members to achieve transparency in their supply chains and contribute to the SDGs.</i></p>	Marcin Piersiak, Alliance for Responsible Mining	Thank you for your comments. It is the intention to ensure that any recommendations can be implemented promptly without waiting for a further full review of the Standard.
Legitimate ASM	Are there any additional areas this workstream should focus on?	<p><i>It is important that in this process RJC makes some effort to define what it means by ASM. In some countries, such as Brazil, loopholes in legislation allow large operations to unjustly receive the benefits of an artisanal and small-scale operation.</i></p>	Charlie Espinosa, Amazon Aid	Thank you for your comment. This will be an important topic for the ASM working group to look at.
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<p><i>The only ASM operation we are aware of in the Amazon that uses ecologically sensitive techniques, including mercury-free extraction and reforestation, is AMATAF, a Peruvian company supported by the organizations Pure Earth and ARM.</i></p>	Charlie Espinosa, Amazon Aid	Thank you for your comment,

Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream	<i>Fairmined, Fairtrade, SBGA, IMPACT, PACT, Solidaridad, Artisanal Gold Council, GI-TOC, IPIS, TDI Sustainability, Fastenaktion, GFBV, SWISSAID, etc.</i>	Marc Ummel, SWISSAID	Thank you for these suggestions.
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>The RJC should work with Fairmined and Fairtrade</i>	Desirée Binternage I, Fairever GmbH	Thank you for these suggestions.
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>The RJC should work with Swiss Better Gold Association, Precious Metal Impact Forum, Impact/Pact</i>	Charlène Nemson, Hermès International	Thank you for these suggestions.
Legitimate ASM	Are there any additional areas this workstream should focus on?	<i>LBMA is already undertaking a substantive review of ASM, RJC should collaborate with this to ensure consistency and avoid duplication of costs and efforts. Also RJC should actively support refiners who genuinely try to engage with ASM particularly if NGO's make negative comments</i>	Simon Houghton-Dodd, Asahi Refining	Thank you for these suggestions.
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>Refiners and downstream actors including those outside the RJC's membership, for example banks</i>	Simon Houghton-Dodd, Asahi Refining	Thank you for these suggestions.
Legitimate ASM	Are there any additional areas this workstream should focus on?	<i>Fairtrade, Fairmined, Alliance for Responsible Mining (ARM) Craft standard, Artisanal Gold Council, DELVE</i>	Assurance Services International	Thank you for these suggestions.
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF): https://www.igfmining.org/ <i>European Partnership for Responsible Minerals: https://europeanpartnership-responsibleminerals.eu/</i></i>	Assurance Services International	Thank you for these suggestions.
Legitimate ASM	Are there any additional areas this workstream should focus on?	<i>The ASM-focused project landscape is already fragmented, and even the definition of 'legitimate ASM' is not widely agreed, except in the case of some relatively niche schemes (and narrow vertical supply chains). Therefore, any such workstream, if it strives for structural improvements in ASM sourcing, might be advised to first</i>	World Gold Council	Thank you for your suggestion.

		<i>map out the current opportunities for global collaboration on key issues.</i>		
Legitimate ASM	Are there any key organisations the RJC should consider including as part of the ASM workstream?	<i>OECD, WGC, LBMA, World Bank, Planet Gold... in addition to Artisanal Gold Council, ARM etc</i>	World Gold Council	Thank you for these suggestions.
Investment material and mining by-product	General	<i>1oz bar 1kg bar or 10 oz bar, once it is redeemed for monies to a refiner. If we then incorporate it into our refining process and repurposed that should be considered recycled. Everything has a purpose until it is recycled and repurposed. We are COMEX Good Delivery in gold, 100% recycled. Our bars on the comex are 100% recycled. Under the new description our own bars would not be eligible. The investment bar has a purpose when its done with that purpose it gets recycled. Jewellery has a purpose when its done its recycled. I take a 1oz maple leaf and pay for it I have monetized it. As we process refining lots, we have scrap jewellery. If someone throws in 100oz of scrap jewellery. We have to pull it out of the process and say its CoC and then reprocess it as something that is recycled. The meticulous degree for separating materials isn't being done.</i>	Refiner member	Thank you for your comment. The RJC is undertaking a further review of this provision and the associated controls and will reach out for further consultation on this topic. This has been prompted by the high number of comments in relation to this provision, industry initiatives to codify the topic and a desire to reach a position that provides clarity to consumers while also working for the industry.
Investment material and mining by-product	General	<i>There is not enough scrap metal coming in to provide the jewellery industry with metals to make more jewellery. Where do we get the supply of metal? If we put more and more and constraints on everything we are trying to figure out how to supply. We need investments bar to supplement because there is not enough supply. Artesian mining? There isn't going to be enough of it. If we only take business from above ground metal that we do lots of compliance on where do we get metal from. We have customers saying they only want CoC metal and they don't even know what that is but they are told it's the best etc. They are forcing us to supply it them and we don't have it.</i>	Refiner member	Thank you for your comment. The RJC is undertaking a further review of permitted inputs for recycled materials and will take this into account in their deliberations.

Investment material and mining by-product	General	<i>RMI and LBMA tend to see investment bars as recycled. That said the way RMI approach is by ensuring that has been through end process that hasn't just been traded between refiners. It has to have come from a refiner who has been certified against RMI, LBMA or RJC auditor programme.</i>	Marianna Smirnova, RMI	Thank you for your comment. The RJC is undertaking a further review of this definition of recycled and what is eligible under this provision. The consultation has shown widespread concern with including investment material, and there has been general support to not include investment in the definition of recycled.
CoC Annex (Transfer Document)	General	<i>We don't see the added value of the list of activities on the Transfer Document. It is not complete not really useful, and there is no information on how to fill it in the COC standard. We propose to suppress it, as it can be a source of confusion.</i>	Leo Daguët, LVMH W&J	Thank you for your comment. We will ensure that further details are included in the Guidance document.
CoC Annex (Transfer Document)	General	<p><i>- We suggest only filling the "COC certified mine, Fairtrade, Fairmined, ICMM mine, TSM mine, Tailings, Mining by-product" boxes when using the document to initiate the chain of custody. It does not make sense to spread this information among all the downstream actors of the supply chain. In addition, if we succeed in having more COC mined gold available on the market coming from several mines (we need to be optimistic!), it may rapidly become something impossible to trace by downstream manufacturers, except in a mass-balance mode, which is not compatible with the current COC rules.</i></p> <p><i>- Recycled: as we suggest keeping the current definition until ISO has developed its definition, there is no need for having 2 separate boxes</i></p>	Richemont International SA	Thank you for your comment. RJC believes that there is still a significant requirement for traceability of the origin of mined materials throughout the chain. Removing the requirement after the chain has been initiated could lead to negative perceptions from external stakeholders.
CoC Annex (Transfer Document)	General	<i>I would like to be more precise about CoC transfer document information because when we have CoC contractor we do an audit to check the chain of traceability. Do we need to put the name of the contractor or the name of the final client on the document?</i>	Linda Thetis, Richemont International SA	Thank you for your question. If I have understood this correctly, the Transfer Document should be in the name of the next party in the chain of custody - whether this is an outsourced contractor (where the transfer document is being used) or the final client. Please do not hesitate to reach out if this has not answered your question.

CoC Annex (Transfer Document)	General	<i>Keep a more concise A4 page size.</i>	BJOP	Thank you for your comment. Unfortunately the amount of information required is difficult to compress further. However, members are able to tailor this to only include the relevant data so can make this shorter.
CoC Annex (Transfer Document)	General	<i>To simplify, do not mention subcontracting even if no transfer document is exchanged with non-CoC subcontractors. What is the added value of the proposed subcontracting declaration that only concerns the transfer document issuer and does not mention previous subcontracting? Practical implementation difficult to manage.</i>	BJOP	Thank you for your comment. There are increasing demands for greater transparency in relation to CoC materials so the RJC does not feel that this requirement can be removed at this stage. However, the template has been simplified to only reference processes and omit the details of the subcontracted parties.
CoC Annex (Transfer Document)	General	<i>Keep the option to customize the transfer document layout as long as the required information is present.</i>	BJOP	Thank you for your comment. The ability to tailor the document is being maintained. The annex is a template to assist members who do not have their own format.
Recognition of Standards and Initiatives	General	<i>Potential standards include ITIE, RMAP (from RMI), RRA (from RMI), RGMP (WGC), IRMA, CRAFT.</i>	BJOP	Thank you for your comment. We will include this in the list of organisations to reach out to.
Legitimate ASM	General	<i>Suggestion to include SBGA</i>	BJOP	Thank you for your comment. We will include this in the list of organisations to reach out to.

<p>Compliance with International Sanctions Regulations (Annex)</p>	<p>General</p>	<p><i>With this new section in the transfer document, we add elements issued from the due diligence exercise to a document whose purpose is linked to the traceability of the transferred material. Those 2 things are very different and cannot be part of the same document.</i></p> <p><i>Either the transfer document stands for traceability of the transferred material, or it stands for due diligence elements.</i></p> <p><i>If this new section is present on the transfer document, which refers to the material that is attached to the document, it means that the issuer has to screen the whole supply chain (its suppliers and the suppliers' suppliers and the suppliers' suppliers' supplier's etc etc, which is entirely impossible) that was used to produce the specific lot that is transferred, to make sure that at the time of the delivery, it complies with the listed sanctions.</i></p> <p><i>In addition, what would happen if everything was fine when the issuer received the components some days, weeks, months, or years before to produce the material he transfers, but at the time of delivery, one of the suppliers is no longer complying with the sanctions? Does the issuer need to reject the product? And produce it again with the risk of discovering the same issue with another supplier once he is going to transfer?</i></p> <p><i>Making a statement on a specific lot is very different from periodically screening all the suppliers to ensure they comply with international sanctions regulations.</i></p> <p><i>ð In our opinion, this kind of due diligence statement has nothing to do with a traceability document linked to a specific lot of material. It should be limited to be part of the due diligence annual public report (5th step of the OECD due diligence process)</i></p>	<p>Richemont International SA</p>	<p>Thank you for your comment. As previously advised this is an optional declaration that companies may use where their clients are requesting this.</p>
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<p>Sub-contracting declaration (Annex)</p>	<p>General</p>	<p><i>This is a huge administrative burden, sometimes even impossible to manage as a systematic output to be available for the transfer document.</i></p> <p><i>Having it on the transfer document does not provide any valuable information for the receiver, as, in case of a doubt, he will raise questions to the issuer => COC should require having the information available at the issuer's side (which is the usual way to manage sub-contracting). But that's it!</i></p> <p><i>This is even more unuseful as it will be limited to the subcontracted operation made by the issuer only.</i></p> <p><i>You may have a widespread situation where an issuer produces products (watch cases, for example) by assembling purchased components in-house.</i></p> <p><i>As he assembles all the components in-house without sub-contracting, no sub-contracted operations are mentioned on his transfer document to the watchmaker.</i></p> <p><i>However, all his suppliers who manufactured the various components he assembles (backlids, bezels, crowns, etc) used sub-contractors to produce these components. This information will be mentioned on the components manufacturers' transfer document to the watch case manufacturer but not on the watch case producer's transfer document to the watchmaker => the information is lost at this stage.</i></p> <p><i>To solve the situation of this example, we may imagine requesting to have the full traceability for all Tier levels on the transfer document => THIS IS EVEN LESS MANAGEABLE, WE CAN EVEN SAY "IMPOSSIBLE"</i></p> <p><i>Proposal: no subcontracting operation to be mentioned on the transfer document, whether the subcontracted operation was done by a COC or a non-COC subcontractor, and whether the products</i></p>	<p>Richemont International SA</p>	
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		<p><i>were shipped to him with or without a transfer document. Current COC disposition related to subcontracting should be sufficient to demonstrate that the subcontracted operations are well managed.</i></p> <p><i>If the recipient needs information about potential subcontracted operations, he can simply ask the vendor who should provide all the information. Regarding administrative impact for the vendor, providing this information to answer a specific question is much lighter than providing it systematically for every shipment.</i></p> <p><i>Reminder on the paragraph “Need for transfer document to accompany material issued to outsourced contractors” of the Supplementary guidance issued in August 2021:</i></p> <p><i>This answered the question raised several months ago about the difficulties encountered when using a transfer document for products dispatched to non-certified subcontractors. Current COC 10.1 asks for “The entity shall ensure that a CoC transfer document accompanies and, wherever possible, is physically attached to each shipment or transfer of CoC material dispatched to other certified entities, outsourcing contractors or service companies” where it is not clear if the word “certified” refers only to “entities”, or if it refers to “entities, outsourcing contractors or service companies”. The second option is the one auditors ask for, even when parts are shipped to the state services for official marking (Swiss Precious Metal Control – Contrôle des Métaux Précieux Suisse).</i></p> <p><i>The consequences were that non-certified contractors didn’t know about this document (as they don’t know about the COC rules) and considered it an additional document they don’t know what to do with and don’t recognize any added value in receiving it.</i></p> <p><i>The solution proposed in the supplementary guidance was even worse regarding administrative burden, compared to the problem it was supposed to solve.</i></p>		
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		<i>This solution was decided without consultation or discussion within the RJC Standard Committee. We discovered it when the supplementary guidance was issued.</i>		
Product Claims and Intellectual Property	General	<i>Broad agreement with this change to product claims and intellectual property and would make it clearer.</i>	SGS	Thank you or your comment.
Product Claims and Intellectual Property	General	<i>I agree with the change and the change reflects similar claims about jewellery made with ARM certified gold or silver.</i>	SCS Global Services	Thank you or your comment.

Glossary	General	<p><i>Service company: official bodies that control the gold fineness to be included in the list</i></p> <p><i>Grandfathered: to have a consistent definition with the guidance and the text of the standard, e.g. only applied to investment products; refining date for Silver</i></p>	Richemont International SA	Thank you for these comments which we will ensure are addressed in the revision and in the Guidance document
General	General	<p><i>Rethink the name of the standard. RJC CoC has the opportunity to become a reference standard and stop being an instrument for image washing.</i></p>	Andres Castellanos, Fairalloy	Thank you for your comment. The CoC is a chain of custody standard for tracing material through the CoC member supply chain, and as such the title aims to accurately represent the content of the standard as much as possible.
General	General	<p><i>RJC is working with over 1700 companies of great diversity in size and capacity. Understandably, it needs to define minimum standards, which should be a point of departure in a journey towards a more responsible jewelry business.</i></p> <p><i>However, there is a space to trace a route of progressivity within the standards, acknowledging that some sourcing options and practices require more effort and lead to more positive ESG outcomes. RJC should therefore take a stronger stance in promoting and rewarding more ambitious choices of sourcing by its members to reach its 2030 impact objectives.</i></p>	Marcin Piersiak, Alliance for Responsible Mining	Thank you for your comments. RJC is constantly striving to find ways to promote continuous improvement, strengthen its standards and is implementing projects to further work towards our 2030 roadmap.
General	General	<p><i>The process wasn't communicated to RJC members effectively</i></p>	Simon Houghton-Dodd, Asahi Refining	RJC's consultation is publicly available and communicated through our website, social media and email. Please see our standard setting procedure on our website for further information on the standard revision process in line with ISEAL.
General	General	<p><i>Audit frequency: Because of the audit load, we suggest having an intermediate audit only once (after the 1st certification audit). An audit every 18 months is far too much work, and comes at a considerable cost, especially for small companies.</i></p>	Richemont International SA	While we recognise the burden that audit frequency can have on our members, RJC's standards must comply with the ISEAL Code of Practice, relevant ISO standards for certification & accreditation and best practice among peer schemes, where annual/ surveillance audits are the norm and a mandatory element of the certification cycle.

General	General	<p><i>I don't know if it's a point of confusion, but I definitely think that the part on due diligence / KYC for what I call "client-bringers" must be well explained. The RJC needs to understand the difference between a client who buys metal, a supplier who sells metal, and a "client-bringer" who gives their waste to a refiner, and receives back real metal OR metal on "metal-account". (ex in France: Valyon, Cookson, Saamp, etc).</i></p> <p><i>Second point : the guidance needs to include recent "supplementary guidance" especially on sub-contractors.</i></p> <p><i>Last but not least, it is sometimes difficult to "explain" auditees about exceptions, and the fact that, for example, palladium (11% or 13%) is not considered as exception (as part of the alloy), but rhodium (-1%) must be referred to as non-COC in an exception.</i></p>	SGS	Thank you for your comments. The RJC will take these into account in reviewing the Standard Guidance.
General	General	<p><i>In France we don't face to many challenges as you know we often audit companies which are helped by consultants... I have to say COC standard is not a difficult standard to audit, because this is quite clear and linked to COP with Due diligence and KYC, but of course if such points are not understood, we face difficulties.</i></p> <p><i>Members needs to understand what partners are concerned by Due diligence and KYC, and to what extent they need to investigate. Major point is, of course, the fact that they don't always understand what they are investigating on, for due diligence and KYC, and they will use a basic "The Dragonfly Initiative" ranking for due diligence, or simple research for KYC which are not always adapted, and they don't always understand HOW this could be at risk or HOW this could impact their business.</i></p> <p><i>But again, in France, most of the time, they are trained by consultants, but I still identify sometimes members who do things "automatically" with a method which is strong but without always understand what is at stake (considering they are located in low risk countries and working with low risk partners, they don't feel very much concerned</i></p>	SGS	Thank you for your comments. The RJC will take these into account in designing more training for their members.
General	General	<p><i>Feedback on the reporting – would be good for the template to include the example guidance questions against each provision on what to include and report on – same as is done with the COP report.</i></p>	SGS	Thank you for your comments. This is not in scope for the CoC Standard review but will be considered when reviewing the reports and assessment manual.

General	General	<p><i>The requirements related to maintain the certificate number and especially date of validity is tedious and time consuming (especially for SMEs) for a limited added value. As a consequence, you can have material which is physically CoC but which is not CoC from a document point of view. The Member can choose to send TD to subcontractors or to disclose a specific statement in the invoice sent to the client. With the increased number of certified companies in the supply chain, some members are now facing the usage of both systems (it is the case for watch case manufacturers or watch manufacturers), meaning that for some of their CoC certified subcontractors the Member has to send back its own TD and for other CoC certified subcontractors not. This includes a complexity that the RJC may not realize since, at this stage of the supply chain, the process cannot be handled efficiently manually but only electronically (meaning ERP software changes to be implemented which may be costly). The RJC should clearly take position to have only one system which is generating any document exchange. A specific statement disclosure in the invoice sent to the client seems the best option. "Wish to have" - for the Members downstream a refiner, the transfer DOCUMENT model is tedious as already mentioned (several Members are mumbling about this requirement) why not replace it by a transfer STATEMENT disclosed only in the invoice sent to the client. As a follow-up of the previous comment, the TD exchange process is even more tedious in the case when there is a quality issue on the subcontracted components -> with a return to the subcontractor which will rework the components. It is still unclear to me whether the subcontractors which are certified RJC CoC have still to be included in the Member CoC scope. In my opinion, this subcontractors can be deleted under some conditions (to be discussed). Note that several companies are certified but do not send any transfer documents although all the precious material within their premises is CoC. The reasons are various but mainly it is : "the client did not ask", "the client does not want to pay a premium for the RJC CoC material, the same client which has asked us to be certified". The requirement on the reconciliation of CoC</i></p>	SGS	<p>Thank you for your comments. While there is some administrative burden in the Transfer Document option, moving to a process of a statement on an invoice would lose much of the required data and lead to a significant loss of transparency. Verification would also then require a more intrusive and deeper verification of all CoC transactions which would have other unintended consequences, including greater costs. Changes have been made to address some of the specific points raised in these comments to allow greater flexibility, especially for outsourced contractors and returns and this will continue to be reviewed where needed.</p>
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