

Fair Jewellery Action

Response to Responsible Jewellery Council call for public feedback on the Chain of Custody paper.

We welcome the opportunity to comment on [RJC](#)'s latest documents. We recognise the challenges and see the logic in the initial steps taken to assure chain of custody.

Fair Jewellery Action is a new network being established by Marc Choyt of Reflective Images (USA) and Greg Valerio (founder of CRED Jewellery and a founding board member of ARM) whose aim is to draw together the breadth of responsible jewellers who are committed to transparency and traceability in the jewellery supply chain to ensure the highest possible standards that reflect these crucial values.

Below is FJA's comments on the RJC chain of custody discussion paper.

RJC offered a variety of supply chain custody models to comment on. In our experience if RJC is going to fulfill its stated objectives of ensuring consumer confidence in the gold and diamond jewellery supply chain, then the only two credible supply chain models that are open for it to pursue would be 'track & trace' and 'bulk commodity'. Although these systems are more expensive to implement in the early stages, we have found that with the required will, clear expertise and the current profit returns that leading RJC members post it is within the RJC's grasp and they are achievable.

In our experience as leading ethical and fair trade jewellers, the only system that can give total assurance to customers of jewellery products is a system that ensures full 100% traceability from mine to retail.

Mass Balance and Book and Claim will not, based upon our experience in the fine jewellery sector, deliver on the stated mission objectives of the RJC. In fact we believe that it will leave the RJC open to the accusation of green washing, as these approaches separate and disconnect the source from the consumer. As all jewellers know, gold and diamonds are not just commodities that are sold, they are aspirations and emotions that are marketed and it is in these marketed aspirations that currently the true value of our product lies. We understand the moral disconnect that currently exists in the jewellery sector between source and finished product which is creating the difficulties we are now struggling with, but a mass balance/book and claim system will not eradicate bad practice, it will only serve to distract from it, leaving our industry rightfully open to the accusation of misleading the consumer.

In final addition to the chain of custody discussion, we note that in the way the framework for the discussion on chain of custody has been presented, it appears that the small-scale mining sector and the environment, who are key and foundational stakeholders in any supply chain, have been overlooked. In our opinion this oversight needs to be corrected before solid progress can be made by the Council on this vital issue.

We also offer these broader comments on RJC's overall position:

- RJC needs to adopt the United Nations Declaration of Indigenous Rights as a core principle. A commitment to this Declaration would be a strong statement of advocacy toward producer communities.
- RJC should broaden its governance to include civil society groups and organisations that can represent the majority of the mining sector; namely the small-sale miners. Currently the governance body of the RJC is only representative of the numerical minority in our industry and supply chain.

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