

## RJC Code of Practices (COP) Review

### Public Summary – invitation for public comment

Comment period: 10 July 2017 to 8 September 2017

Comments, submissions and inquiries welcome. Please contact us at:

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#### 1. Purpose

The Responsible Jewellery Council (RJC) is reviewing its [Code of Practices \(COP\)](#), the standard against which all RJC members must be certified. This document offers a summary of the review so that stakeholders can decide whether and how to engage in it.

We welcome input from all interested parties. In this first phase of the review, we are particularly seeking feedback on potential improvements to the COP and on the review process itself.

#### 2. Background

In December 2009, the RJC formally launched its certification system for responsible business practices in the diamond, gold and/or platinum group metals jewellery supply chain. Through this system, members are certified against the COP, following an independent, third party audit to verify conformance. Certification is granted for three years if no major non-conformances are found, or for one year (with corrective action plans approved by the auditors) where major changes are needed.

A second version of the COP was published in November 2013; and the ongoing review will inform a third version, due to be published at the end of 2018.

RJC is committed to developing credible and effective standards and continually improving its systems. We have been a full member of the [ISEAL Alliance](#) since 2012, and we follow ISEAL Codes of Good Practice in all our standard setting, assurance and monitoring and evaluation.

#### RJC Vision and Mission

Our vision is a responsible world-wide supply chain that promotes trust in the global fine jewellery and watch industry.

We strive to be the recognised standards and certification organisation for supply chain integrity and sustainability in the global fine jewellery and watch industry.

### 3. COP objectives

The COP is the cornerstone of RJC certification. It defines responsible ethical, human rights, social and environmental business practices for companies in the diamond, gold and/or platinum group metals jewellery supply chain. These companies operate across diverse sectors — from mining to retail — and in a wide range of geographies. They include small-, medium- and large-scale businesses.

The COP itself aims to:

- provide a common standard for RJC members;
- set out the mandatory expectations for designing and implementing relevant policies, procedures and practices;
- establish provisions that can be independently audited;
- drive better business practices for positive impacts; and
- mitigate present and future environmental and social supply chain risks.

### 4. Objectives and scope of the COP review

Since the COP was last reviewed in 2013, new issues in responsible business practice have arisen for the jewellery supply chain. We've also learned about potential areas of improvement from the helpdesk and certification. The objective of this review is to improve the COP and supporting documents to ensure we cover all the material environmental and social risks, to make the standard and guidance more clear and accessible, and to inform the RJC training programme.

The scope of the review includes: changes to COP provisions or requirements, changes to the guidance material, and an update of the COP's harmonisation with other standards.

### 5. Process and timeline

The review has three phases:

- I. Planning: to analyse gaps and identify stakeholders;
- II. Revision: to research, assess and draft proposed changes to the standard and guidance; and
- III. Finalisation: to review and approve the changes.

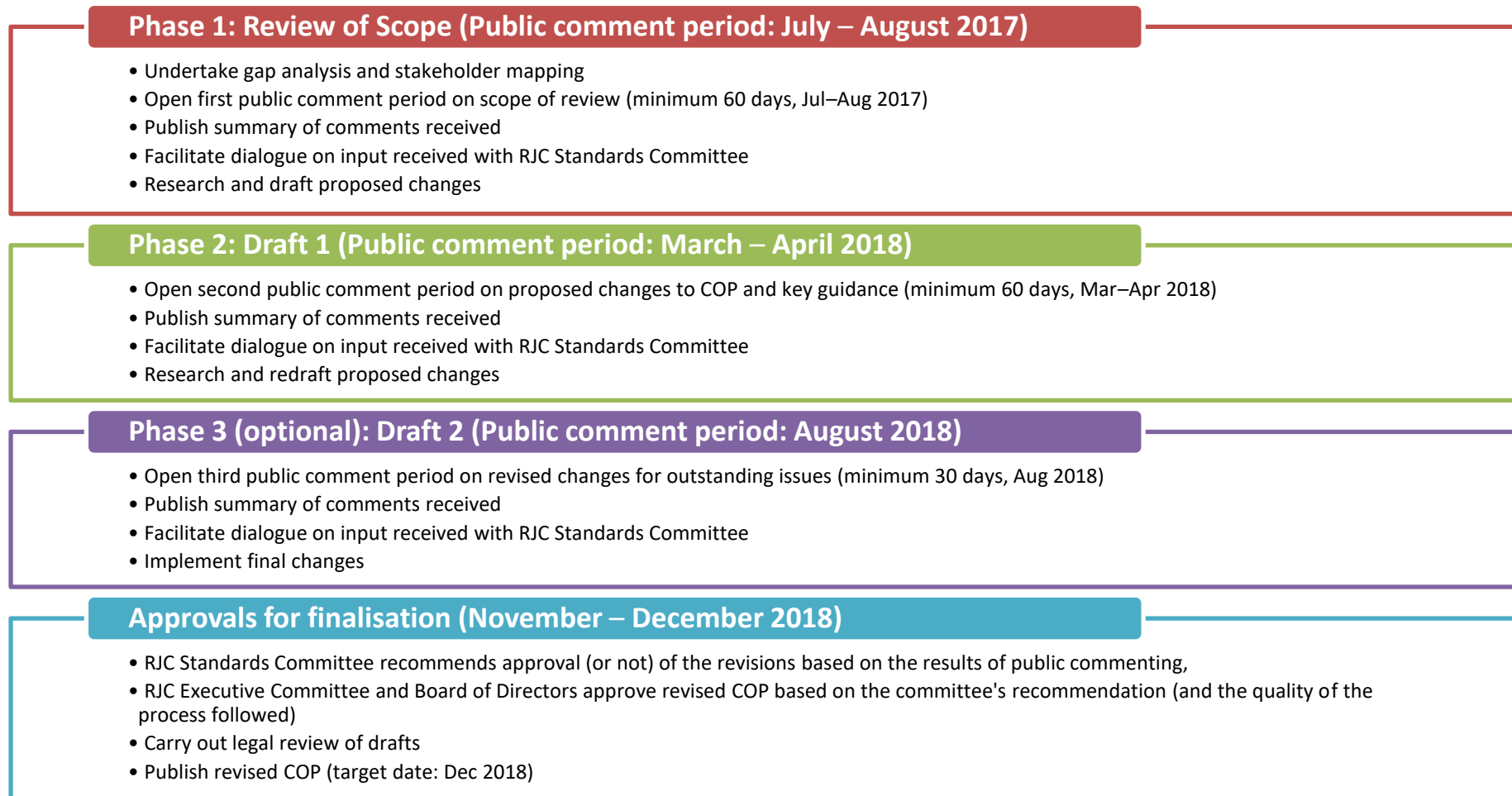
The first two phases rely on public comment and feedback (see Figure 1 below). The target publication date for the revised COP is December 2018.

The RJC's [Standards Committee](#) — which includes company representatives from across the jewellery supply chain as well as auditors, nongovernmental organisations, standard setting bodies and experts — will oversee the COP review. The committee's decision making is based on consensus:<sup>1</sup> if a consensus cannot be reached on a significant decision, voting takes place. The RJC Management Team manages the standards development processes.

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<sup>1</sup> Consensus is defined as general agreement characterised by the absence of sustained opposition to substantial issues: it is not necessarily unanimity.

**Figure 1. Proposed COP review timeline for public comment**



The decision to carry out a third public consultation (optional public comment period in Phase 3) will be taken by the RJC Standards Committee, taking into consideration the level of feedback received and the number of substantive unresolved issues that could be addressed through further consultation.

## 6. Topics identified for review

RJC has identified issues for the COP review based on feedback from certified companies, a review of issues raised through the helpdesk and advice from the Standards Committee. These have been summarised into the proposed review areas in Table 2 below.

We are looking for input on these review areas:

- Are there any issues missing or areas of improvement?
- Which areas should be prioritised for attention during the review?

**Table 2. Review areas for COP**

Ref number	COP provision	Review area	Notes and references
<b>Topics for reviewing requirements (significant to medium changes)</b>			
1	26 (new)	Detection and disclosure of synthetic <sup>2</sup> diamonds	Review need for minimum requirements on detecting undisclosed synthetic diamonds. Review disclosure requirements linked to the detection approach (claims). Consider key references such as De Beers Best Practice Principles Disclosure Practice Note and World Federation of Diamond Bourses Charter on Disclosure of Synthetic, Treated Natural and Natural Diamonds.
2	Responsible supply chains section	Due diligence and Know your Counterparty (KYC) for responsible sourcing	Develop a specific provision on due diligence for managing risks to human rights and sourcing from conflict and high-risk areas. Identify requirements for different types of companies in the supply chain. Re-organise this section particularly drawing on COP 6 (Human Rights), COP 27 (Kimberley Process and System of Warranties), COP 7 (sourcing from artisanal and small-scale mining), and COP 5 (business partners). Align with KYC requirements (currently covered under COP 10 on money laundering and finance of terrorism). Introduce a new requirement to KYC to check relevant government sanctions lists. Review relevant provisions from Chain of Custody Standard <sup>3</sup> .

<sup>2</sup> The term 'synthetic diamonds' is used and is the same as 'laboratory grown' or 'laboratory created' diamonds.

<sup>3</sup> Note that at this time, relevant Chain of Custody provision have not yet been finalised.

Ref number	COP provision	Review area	Notes and references
3	10	Money laundering and finance of terrorism	Review financial thresholds for maintaining records of cash transactions.
4	New scope	Incorporate coloured stones in COP	The RJC Board approved the addition of coloured stones to RJC's material scope in 2016. All COP provisions will apply to coloured stones, material topics to review include: <ul style="list-style-type: none"> <li>• Responsible sourcing, including sourcing from artisanal and small-scale mining (COP 7), due diligence and KYC</li> <li>• Health and safety (COP 21)</li> <li>• Hazardous substances (COP 23)</li> <li>• Product disclosure (COP 26)</li> <li>• Grading analysis and appraisal (COP 28)</li> <li>• Whether to include more than emeralds, rubies and sapphires in scope</li> </ul>
5	New	Mining sector: water management	Review need for specific requirements on water management for mining companies beyond the general provision on water management in COP 25
6	30	Mining sector: community engagement	Review requirements for inclusion of in-migration, and for measuring impacts on communities.
<b>Topics for reviewing guidelines (medium to minor changes)</b>			
7	12	Provenance claims	Develop guidance on provenance claims to avoid 'open ended' claims that do not reference defined systems.
8	26	Disclosure	Review RJC disclosure guidelines to consider US Federal Trade Commission jewellery guides (as appropriate). Develop guidance on appropriate disclosure of plating.
9	14	Working hours	Review need for additional country-specific guidance (for example, for China, Thailand and Vietnam).
10	15	Remuneration	Review need for guidance on remuneration for apprenticeships/trainees in India.
11	18	Forced labour	Update guidance as required, based on review of new legislation related to forced labour (for example, UK Modern Slavery).

Ref number	COP provision	Review area	Notes and references
12	24	Wastes and emissions	Review need for further guidance on managing and reporting on greenhouse gas emissions.
13	37	Mining sector: tailings and waste rock	Review international mining guidelines for coverage of tailings and waste rock management (for example, Towards Sustainable Mining Tailings Protocol).
14	36	Mining sector: biodiversity	Review coverage of key biodiversity areas, including guidance from IUCN and BBOP. Review need for additional guidance on land impacts
15	General	Gender equality	General review of COP for coverage of gender equality, based on international guidance (for example, BSR Gender Equality in Codes of Conduct).
<b>Standards harmonisation</b>			
16	Assessment Manual	Sedex Members Ethical Trade Audit (SMETA) - audit procedure compilation of good practice in ethical audit techniques	Consider recognition of equivalent provisions
17	Assessment Manual	Mining Association of Canada Towards Sustainable Mining (TSM)	Consider recognition of equivalent provisions
18	Assessment Manual	International Council on Mining and Metals (ICMM) Sustainable Development Framework	Consider recognition of equivalent provisions
19	Assessment Manual	SA 8000: 2014	Update existing recognition based on review of latest version.
20	Assessment Manual	ISO 14001: 2015	Update existing recognition based on review of latest version.
21	Assessment Manual	Conflict-Free Sourcing Initiative (EICC-GeSI) Smelter/Refiner Validation	Update existing recognition based on review of latest version.
22	Assessment Manual	London Bullion Market Association (LBMA) Responsible Gold Guidance	Update existing recognition based on review of latest version.

## 7. Stakeholder engagement

The RJC COP aims to address a wide range of topics, that are of interest to many stakeholders. Figure 2 maps our key stakeholder groups: the diverse companies that implement the COP; the experts that support the COP's assurance and implementation, or have related experience in standard setting; and the civil society groups and other stakeholders with an interest in the COP's potential impacts.

**Figure 2. RJC stakeholder map**



## 8. Your input

Input and feedback on the RJC COP review is welcome at any time during the review process on both the standard and the review process itself. In this first phase of work, we particularly welcome comments on the gaps identified in the review areas for the standard. Comments and questions will be recorded and compiled in a summary for public sharing, without attribution to individuals or organizations (unless otherwise agreed).

The Comment Form is available [here](#) (and copied below for reference).

We will send all interested parties periodic updates on the standards review, including opportunities for engagement and comment.

If you are interested in contributing to the COP review process, please let us know by contacting [consultation@responsiblejewellery.com](mailto:consultation@responsiblejewellery.com)

### RJC Code of Practices Review – Comment Form

**Date:**

**Name:**

Please tick here if you would like your comments to be kept anonymous:

Provision number	Type of comment <sup>4</sup>	Comment	Proposed Change

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<sup>4</sup> Type of comment: ge = general te = technical ed = editorial