

Proposed RJC Definition of Recycled Materials

For Consultation

Summary

Following 2 rounds of public consultation on the review of the CoC Standard and proposed rewording of the provisions on recycled materials RJC has received extensive, but conflicting feedback.

- Round 1 proposed the original RJC wording, with a potential expansion to mining by product and investment material. There was strong opposition from the consultation to an expansion of this scope to either of these sources. The consultation also received considerable support from a number of different stakeholders for adopting the PMIF definition for recycled gold.
- Round 2 proposed adopting the PMIF definition for recycled gold and retaining the current definition for silver and PGM, updating the Standard to bring together the requirements into a single provision. However, this round of consultation saw a number of opinions in relation to the definition for recycled with views broadly diverging into:
 - a continuing support for the PMIF approach from some stakeholders
 - others indicating a preference to adopting the ISO definition
 - a general desire to move towards a single definition that would encompass all materials in scope rather than having a separate approach for gold and other precious metals

As a result, the RJC has reviewed this topic again and is proposing a new definition, detailed below, which focusses on:

- Allowing the RJC to continue to take a leadership position on this topic.
- Including all precious metals in scope.
- Bridging the gap between the PMIF and ISO, while also considering key points from other Global Standards.
- Building on existing work, rather than re-inventing the wheel.

It is recognised that this definition may need to be reviewed again prior to the next full review of the Standard to recognise any major changes that arise as the ISO definition and other Standards undergo their revision, but RJC wish to now seek formal input through this 3rd consultation in order to finalise the definition and the associated changes to the CoC Standard.



Proposed New Definition

The proposed definition differentiates between pre- and post-consumer materials only allows the mixing of different high-value post-consumer streams together with some low-grade pre-consumer inputs to be labelled as recycled. Investment materials are excluded as a source of eligible recycled material, which is the position that was strongly supported through the first two rounds of consultation on the CoC Standard revision.

Recycled

Gold, silver or PGM derived from:

- high value post-consumer precious metal products, such as jewellery and ornaments that are no longer required/desired or can no longer be used for their original purpose;
- low grade scrap and other such materials from the manufacturing process such as floor sweepings and pollution control materials;
- melted manufacturing scrap fully traceable to eligible recycled material; or
- waste from industrial products including electrical and electronic equipment, or industrial components such as spent catalysts and fuel cells.

Note: investment materials are excluded from this.

New Category – Reclaimed (name to be decided - see other proposed suggestions below)*

Gold, silver or PGM derived from the jewellery and manufacturing process or from semi-processed or finished items that have not entered the consumer market but are returned to a refiner or other downstream intermediate processor to begin a new life cycle as “reclaimed gold, silver or PGM”.

Note: freshly mined material, including tailings and any wastes and by-products of mining operations are excluded from this section, as are partially-refined products with a direct mining origin other than low grade scrap and other such materials such as floor sweepings and pollution control materials which are included under recycled above.

* Other proposed names include Reprocessed; Repurposed; Remanufactured; Reconverted; Retreated.

Notes on Application of the Definition

Mix of Reclaimed and Recycled		
Reclaimed (name tbd)	Recycled mixed	
	Recycled waste	Post consumer recycled
Manufacturing & production scrap*	E-waste (industrial and other post-consumer goods)	Jewellery and ornament scrap**
Casting scrap	Sweeps, rags, workers equipment such as aprons and gloves	Dental scrap
	Crucible/cupel, bricks, furnace flue dust	Melted manufacturing scrap fully traceable to eligible recycled material***
	Plated material	

Broadly speaking, different materials would fall into the categories below.

**Internal scrap not accepted – needs to be external e.g. scrap bought from a refinery. Twice refined.*

***If sourcing or accepting excess jewellery stock (unsold), sufficient due diligence would be required to ensure that it can genuinely be considered post-consumer and controls would be defined in the CoC standard and guidance. Existing CoC finished products can be accepted back to remain as CoC material per new provision 10.*

**** Where manufacturing or production scrap is derived from material traceable to recycled material, it can re-enter the process as recycled material.*

Product Declaration for Mixed Sources:

- Reclaimed & recycled mix must be declared as such e.g. “mix of reclaimed and recycled”. If members wish to define a percentage of each category (e.g. 60% reclaimed 40% recycled or similar) they will need to provide auditors with evidence to support such calculations.
- Post-consumer recycled and waste recycled can be mixed and declared as recycled.