

RJC Laboratory Grown Material Standard Review Comment Report on Preliminary Consultation

A summary of comments received on the Public Summary document of the Laboratory Grown Material Standard review

Comment, submissions and inquiries welcome: Please contact

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1. Purpose

The Responsible Jewellery Council (RJC) is writing a new Lab Grown standard. In September 2021, RJC shared a [Public Summary](#) of the Laboratory Grown Standard review which outlines the objectives, scope, process and timeline of the review and invited feedback from all interested stakeholders. This first round of consultation closed in December 2021. The purpose of this document is to share comments received during the first round of consultation.

2. Comments

Our consultation on the public summary was carried out through an email campaign using the full RJC stakeholder list (over 4,500 recipients) and posting of the revised proposed changes to our website. Recipients include RJC members, audit firms, NGOs, industry press, trade associations, and government representatives. In response, we received over 54 written submissions, not including the comments received during the roundtable discussions.

A summary of key points raised by stakeholders during the first round of consultation is below:

- Product disclosure of laboratory-grown stones is highlighted as a top priority.
- Much of the COP already covers applicable issues and risks, so there will be minimal differences between standards.
- Product segregation will need to be important and all members regardless of size and complexity will need to be able to demonstrate compliance.

Table 1 in the annex has each of the individual comments received from the first-round consultation, verbatim. We greatly appreciate the time and insightful contributions from the submitters.

3. Next steps

These comments, in conjunction with internal research are being used to create a new RJC standard on lab-grown material. The RJC Standards Committee will be reviewing proposed changes and upon their approval, a draft of the updated Laboratory Grown Material Standard will be publicly shared for a 60 day review as part of the second round of public comment.

This document includes comments received via the web from, and other forms of communication such as email. They have been grouped under the relevant heading.

Table: Consultation Comments and RJC Responses

No.	Name	Comment	Response
Question 1: General Comments			
1.		Crucial to make the disclosures regarding LGMS mandatory at every step of the supply chain, especially if a company trades both in LGMS and natural materials. Also very important that the wording allowed (or forbidden) to be used when making such disclosure be very clearly stated in the standards.	Product disclosure is an incredibly important element of any RJC standard and the Laboratory-grown standard will also include agreed and recognised approaches for disclosure of laboratory-grown stones.
2.	Georges van Tieghem	The material standard should aim at full transparency (disclosure, product integrity and segregation)	Segregation is likely to be a key element to any business selling both natural and laboratory-grown stones, but RJC will consider any requirements or guidance to include in the draft laboratory-grown standard.
3.	Allison Charalambous	We are excited to see a lab grown standard developed by the RJC. Looking forward to it encompassing the various actors in the supply chain and to ensure it is a right size model that includes growers, manufacturers, and wholesalers.	Ensuring that the standard is workable for all and demonstrates having a positive impact for all stakeholders in the laboratory-grown sector will be key.
4.	Thomas Chatham	I do not understand the need.	RJC is a voluntary standard, no company would be mandated to participate in the RJC standard if they don't want to. For companies that want to demonstrate both internally and externally that they are a business implementing responsible business practices and are a company who seek to have a positive impact, the RJC standard is a tool that they can use to achieve this.
5.	Canadian Jewellers Association	The Canadian Jewellers Association (CJA) respects and applauds the work of the RJC in developing laboratory-grown materials (LGMS) standards for this segment of our industry. We have three initial comments to make.	Many thanks for your participation with this consultation process. RJC will seek to ensure that we implement requirements of current standards, including harmonisation and alignment where applicable. Product disclosure and claims about the provenance or environmental impacts of products will need to be fact based. Our standard will need to ensure that consumers can make informed decisions and

		1. Whatever standards are developed for any segment of our industry, these standards must dovetail with any current standards and not be segmented into separate standards depending on the product. 2. Any and all claims made about LGMs, whether they be eco-friendly, sustainability, environmental, ethical or of origin, must be proven with facts. Any claims that are vague, non-specific, incomplete, or irrelevant should not be used. 3. Transparency is paramount throughout the supply chain ultimately ending with clarity for consumers.	any marketing or information that does not support a consumer will need to be amended.
6.	Effie Marinos	Essential to get a standard in place to ensure protection for customers (B2B and B2C) and to ensure that the manufacturers of these products are held to the same standards as on social responsibility as those mining and cutting/polishing natural gemstones.	Noted.
7.	Alex Schlindwein	I think this is a great initiative and we need to acknowledge that lab-grown diamonds are here to stay and are not going to continue to grow in popularity within the market.	The jewellery industry and consumers of jewellery will only engage with laboratory-grown material on an ever increasing and wider basis. This is a reason why RJC is creating a standard specifically for laboratory grown material.
8.		will the LGMS have different answers concerning synthetic diamonds and synthetic-coloured gemstones? will the LGMS be different from the CIBJO LGD Guideline concerning the synthetic diamond?	There will be specifics around the disclosure of treatments, which will differ for laboratory-grown diamonds and coloured gemstones, but most requirements will apply to all laboratory-grown materials. RJC will always look to engage with existing guidelines and industry recognised approaches such as CIBJO.
9.	Michael Lebowitz	The Laboratory Grown Diamond Market has been look at by many as a disruptor, instead of what will be a commonly stocked category within a short period of time. Laboratory Grown Diamonds need to be treated with the same reverence as Natural, with GIA training programs first in short courses nationally, then within the normal diamond grading program. Trade organizations need to address whatever standards your body puts in place. Currently from my experience, the biggest problem seems to be the retailers not incorporating Lab Grown as an alternative to Natural Diamonds during their presentation at the diamond bridal counter. As I travel around the country, it amazes me how many retailers do not	Your input would be welcomed, RJC will be holding a second round of public consultation on the development of the laboratory-grown standard and we encourage you to engage with us with any commentary and observations you may have. RJC would welcome an opportunity to speak further on these issues.

		understand that, whether above ground or below ground, a Diamond is a Diamond. I have much more commentary and over all observations that I'd be willing to share, one on one if you have interest.	
10.	Carson	Shouldn't all manufacturers, retailers and wholesalers be responsible and accountable to be transparent (when done) the post treatment of all CVD stones to their customers.	All post manufacturing treatments will need to be disclosed to the customer. Ensuring that consumers can make informed purchases is important.
11.	Douglas M Liebman GIA GG	Any grower/manufacture of lab grown diamonds should be responsible and, like makers of any other reputable jewelry items, should have BOTH a LAB GROWN mark laser inscribed on the stone and their registered trademark lasered adjacent to the LAB GROWN inscription	Laser marks or identification is certainly one way of identifying stones that can be used as evidence to support traceability and identification. RJC's standard will need to ensure that anyone can implement the requirements, so whilst laser marks or identification can be used, it cannot be the only method required.
12.		very concerned it will cheapen the value of mined diamonds	RJC is a standard setting and certification organisation, the market value of a commodity is unlikely to be affected by a voluntary initiative.
13.		For lab grown diamond to be eligible of labeling as "diamond", the physical property must remain 99.99% identically as the natural diamond. The purity, crystal structure, composition, hardness and luster are essential parts of diamond value that are unique and eternal to consumer. Manufacturers should only grown rough from high density and quality carbon seeds without mixing any other materials, to protect this alternative choices of integrity and build trust in market. In grading quality of the finished goods, lab grown diamond should not be certified same as the natural diamond GIA 4C because that may diminishing the value of rarity in comparison. International Laboratory standard alignment and consistency of "equivalent" terms is needed for public quality reference. Full disclosure of synthetic/man-made/lab grown cannot be compromised in any form of trading for consumer best interests.	Product disclosure is an incredibly important element of any RJC standard and the Laboratory-grown standard will also include agreed and recognised approaches for disclosure of laboratory-grown stones.
14.	Zulu Ghevriya	Lab grown Diamonds are same product as diamonds are having same nature of operational work flow. There is few segment can be made in Lab grown industry : a) Grower + Manufacturer b) Jewellery manufacturer. Important roll in whole pipeline is Grower, where mostly they are the prime source of the product. Standard of Growing with uses of clear and declared energy sources , manufacturing process , material sourcing and its safety (Since its dealing with gases).	Product disclosure is an incredibly important element of any RJC standard and the Laboratory-grown standard will also include agreed and recognised approaches for disclosure of laboratory-grown stones.

		Manufacturing and brands are following same standard practice of industry which should be as equal as natural diamonds are. Most importantly the declaration of the product at every stage. Consumer confidence is most important for Jewellery industry in that case : a) Hallmarked with LGD on the Jewellery can be introduced as standard of Practice. b) Completion of mentioning "Lab Grown Diamond" or to be precise "HPHT grown Diamond" or "CVD Grown Diamond" at the time of certification by International Labs.	
15.	Dave Rossi	I am not a fan of lab grows. I see that the industry has accepted them with open arms as I am constantly inundated with emails and calls. I at this point have not had any customers request lab grows and we will (unwillingly) start to sell them when they do. Until then my biggest concern is getting a decently priced tester so that I can distinguish between them.	Product disclosure is an incredibly important element of any RJC standard and the Laboratory-grown standard will also include agreed and recognised approaches for disclosure of laboratory-grown stones, aiding in the purchase of lab-grown as well, by seeking that upstream suppliers disclose or implement a testing approach to ensure that sold materials are properly identified.
16.	Ya'akov Almor	a. With its decision, RJC places itself in a difficult reputational position. It will be regarded as a step taken by the big companies (as per the make-up of the board and the various relevant committees) to impose their dictates on their members. In addition, for the sake of transparency, it would be essential to understand how the RJC board decided to set standards for LGMS and how the vote was procured. In general, the perception of the trade, i.e., that the RJC is another money machine looking to gain bulk through issuing dictates on its membership, may become well justified if the RJC is to go forward with this thwarted undertaking. b. RJC intends to require its members to commit and adhere to RJC's LGMS standards once they are set. That requirement is problematic in itself. There already are widely accepted standards set by the ISO (18323 and 24016) for diamonds and lab-grown diamonds (LGDs). These standards were the culmination of the decades-long efforts by the International Diamond Council (IDC) and CIBJO. RJC can encourage its members to adopt these standards for diamonds, it should not try and set its own. It should seek to stand on the shoulders of giants, not to try and topple them.	Your position and comments are noted. CIBJO is a close collaborator of the RJC, the blue books are referred to in the COP and are recognised literature, however the blue books are not standards. ISO18323 is only applicable to natural stones and 24016 only refers to grading, the standard for laboratory grown stones will have a wider scope than this. Since RJC scope expansion in 2019, we have been engaging further with coloured gemstone trade organisations and experts and will continue to do so.

		c. Presumably, RJC's LGMS standards will also include standards for synthetic colored gemstones. Contrary to the diamond industry and trade, the colored gemstone industry and trade has 'lived' with synthetic counterparts of the Big Three- emerald, ruby, and sapphire – since the late 19th century. The quick proliferation of these synthetics also led to the rise and development of the science of mineralogy, the descriptive scientific discipline of gemology, and the establishment of a choice of reputable laboratories that serve the trade. Also, any self-respecting and successful trader will be well-educated and well-informed on the developments concerning synthetics and the potential threat they present in their day-to-day practices and work. d. A quick look at the make-up of the RJC board and the relevant committees shows there is no colored gemstone manufacturer or trader on these bodies. Also, none of the leading colored gemstones trade organizations (AGTA, ICA) is represented. In general, colored gemstone experts and traders will be concerned that any regulatory measures concerning colored synthetics will result in a stamp of approval and uplift these products commercially among consumers and cause considerable damage to the trade in natural diamonds and gemstones. That should not be the outcome of this undertaking by RJC.	
17.		All diamond products need complete transparency to enable the consumer to choose with thorough knowledge about both natural and LD diamonds.	Product disclosure is an incredibly important element of any RJC standard and the Laboratory-grown standard will also include agreed and recognised approaches for disclosure of laboratory-grown stones.
18.		'Memorial diamonds' have been big business for many years. Many of the companies producing and selling these laboratory-grown diamonds use misleading claims. There is for example no scientific proof that the ashes used are also a source of carbon. There is very little transparency on the part of producers. Has RJC considered that these companies may seek RJC certification? What claims would and wouldn't RJC allow them to make? And how will RJC protect consumers from misleading claims in what is a niche but very lucrative part of the industry?	Product disclosure and claims about the provenance or environmental impacts of products will need to be fact based. Our standard will need to ensure that consumers can make informed decisions and any marketing or information that could mislead a consumer will need to be amended.
19.	Wade Abel	A standard for the industry is important. It will ensure that the information about and disclosure of the material and its origin are clear and communicated. Transparency and education through the entire	Noted.

		jewelry supply chain are highly important, allowing the consumer to make informed decisions and enforce ethical business practices. A thorough, fair, well developed, and inclusive standard can set the baseline for laboratory-grown materials moving forward.	
20.	Jennifer Hillard	LGMS standard must take care not to repeat the misleading sustainability claims made by Pandora when they began using lab grown stones. Contrary to the September JCK article on this work, lab grown stones will require full disclosure despite their different risk profile from natural gems. Total transparency is essential for any consumer focussed standard and this should be no different. The science behind any life cycle work relating to either the environmental impacts or the social ones must be able to stand up to a peer review. Also contrary to the JCK article, it will be essential that the LGM standard competes with the SCS Global "Certified Sustainability Rated Diamond Standard" as that standard is misleading to consumers and lacks rigour. It is critical that this standard makes it clear to consumers that this is just a different type of gem. Care must be taken not to promote either lab grown or natural as "preferable" to the other. While all standards require a measure of flexibility in order to be useful to all sectors of the supply chain, including consumers, care must be taken not to use that flexibility to create loopholes.	RJC is creating this standard to support and ensure that consumers can make informed decisions and by creating this standard we hopefully illustrate that RJC does not promote or endorse any material in our scope over another, we seek that anyone who operates in the jewellery and watch industry performs responsible business practices and ultimately instils trust in our standard and member companies.
21.		CIBJO has published "The Laboratory-Grown Diamond Guidelines" which is a framework for the laboratory-grown Diamond industry and trade. The primary goal is to protect consumer confidence.	RJC standards will work to align and recognise existing industry initiatives and guidelines where applicable.
22.	Richard Chetwode	If this is going to hold any LGD company to a level disclosure on sourcing and honest marketing, then I can see the benefit, but I worry this is just a way of generating more revenue for the RJC and giving a veneer of credibility to the bad players - those retailers who either need cover for LGD sourced from manufacturers run by the Chinese army, and those who undermine the natural industry with lies, falsehoods and innuendo to promote their own business.	All members have to comply to the same standards and will be independently assessed by RJC accredited auditors to verify compliance. All new members are subject to a thorough due diligence process on application for joining.
23.	Effie Marinos	essential to get a standard in place to ensure protection for customers (B2B and B2C) and to ensure that the manufacturers if these products are held to the same standards as on social responsibility as those mining and cutting/polishing natural gemstones.	Noted.
24.	Rapaport	Man-made diamonds should be subject to the same Patriot Act, AML, CTF compliance requirements as natural diamonds	All members of the RJC need to comply with all provisions that are applicable the materials that they handle / trade in.

25.		As a retailer who sells lab diamonds would our transition to the COP 2019 change?	A transition phase for this new standard would be implemented, members would be able to implement the new standard into their existing COP cycle.
26.		Would it be able to apply to manufacturers, wholesalers and growers?	The Laboratory-grown standard is intended to be applicable to the entire supply chain.
27.		Will there be environmental requirements at the grower level?	The standard will take into consideration the different lab-grown supply chain points and what topics will be relevant to these, taking into consideration level of impact, including environmental considerations.
28.		Since the certificates are very narrow, it would be good for retailers to have input into what the environmental impact of the growers are.	All stakeholders are encouraged to engage with the development of the laboratory-grown standard.
29.		Multiple submitted comments stating that the standard does not need to be re-written from scrap, just add in the small sections/additional sections for lab grown. Identify the areas that may be unique to lab grown products and zero in on those. Important so that the consumer can realise the RJC stamp of approval means something.	Noted.
30.		Will RJC include the sustainability compliances of the standards in the COP?	The Laboratory-Grown Standard will look like the COP but be applicable to laboratory grown. Therefore, LGM members will have to comply with the same sustainability and responsible practices requirements. The structure may be subject to change to save duplication. So, members already COP members, can use the COP as a baseline. Then the LGMS only has requirements that specific to LGM materials.
31.		You should keep COP 1-30 the same as it is applicable to LGMs too. Perhaps have an add in for COP 21-42 to replace mining, as mining won't be applicable.	Noted.
32.		If make a single standard would be good, but will need a chart to show which clauses in the standard will be applicable to who – so you know if you deal with LGMs you know which provisions are applicable to you.	Noted.
33.		Need to address the risk of using beryllium on lab grown Emeralds.	Your comments have been noted.
34.		Need to have provisions for safety on the upkeep and maintenance of technology and specialist equipment	Noted.
35.		Standard for LGD should be developed in coordination with manufacturers of LGD. Thorough knowledge of manufacturing and related processes is necessary to develop the standard. General knowledge-based inputs are inadequate.	RJC has engaged with a number of laboratory-grown diamond manufacturers during the consultation process and ensure that we continue to engage with manufacturers as the standard is developed further.

36.		If a non-member seeks certification would the company have to become RJC COP certified first? This will have significant implications for industry uptake.	Every new member has two years to comply with RJC standards, this would apply to both the COP and Laboratory-grown standard as well.
37.		Good to clarify the type of lab-grown stones in scope and the criteria used to determine in/out-side scope, e.g. stones that substitute mined gemstones or as suggested below produced using certain technologies. We assume that cubic zirconia, nano-crystals, and other simulants are not in scope.	Noted.
38.		Recommend to develop a standard that has specific requirements for companies in the different stages of the value chain, e.g. retailers, handlers, cutters & polishers, and producers. The risks are too different at different stages of the supply chain to meaningfully cover as a one-size-fits-all.	Noted.
39.		Are there end products produced with these technologies that do not substitute naturally occurring stones?	
40.		Assume the standard will be consistent with relevant COP19 clauses on health and safety	COP 19 refers to child labour. For COP 23 – health and safety the requirements would mirror each other.
41.		CVD and HPHT are relevant to lab-grown diamonds but many other stones in scope are grown using other technologies. Need to cover all growth technologies	Noted. The standard would be applicable to all laboratory grown diamonds and coloured gemstones regardless of manufacturing process.
42.		Critically important that the standard addresses all materials in scope, not least because some of the other lab-grown gemstones have upstream risks that LGDs do not have, e.g. at raw materials extraction.	The standard will apply to all laboratory-grown stones.
43.		The standard could address specifically risks that occur at different stages of the supply chain, i.e. retailer, handlers, cutters & polishes, and producers. It will strengthen the standard and increase likelihood of update	Noted.
44.		Need to recognise in the standard manufactured materials can also come from CAHRA regions. The assumption only natural can would stigmatise naturals.	Members requirements to conduct due diligence on all of their suppliers to assess CAHRA origins would be applied to laboratory-grown standard, mirroring the COP.
45.		RJC to consider requirements that are specific for LGM producers, LGM dealers and manufacturers and LGM retailers, considering the various risks along these aspects of the LGM value chain that are either the same as natural materials as well as those that are specific only to the LGM value chain (e.g. sourcing of seed inputs to the LGM process/intellectual property rights etc).	Noted.
46.		Standard to include specific requirements for all producers/dealers/retailers/manufacturers in LGM uphold and protect Intellectual Property Rights	Noted. RJC will not require members to disclose their IP.

47.		Input sourcing a. All inputs (diamond plates/seeds, major consumables (metals (e.g. nickel, cobalt, iron) and gases) etc) that go in to the LGM creation process need to be accounted for and responsibly sourced. The RJC standard needs to stipulate robust sourcing requirements that are aligned with the rigour under the COP. However, if sourcing natural diamonds as an input to the LGM process, KP, WDC and OECD DD guidance on responsible sourcing must apply as a minimum.	Members would be required to conduct OECD due diligence on their supply chains, the same requirement as the COP.
48.		Environmental risks: CVD and HPHT; Environmental impact provisions should be a key focus of the LGMS, e.g. Energy usage, waste management, water usage, carbon footprint etc.	Noted.
49.		General social requirements should align with the RJC COP. a. Human Rights commitments and due diligence b. Non discrimination c. Health and safety d. Etc	Noted.
50.		a. Grading certificate should be clear it is LGD, PLUS, should include: b. Growth method (CVD/HPHT) c. Post treatment for colour.. (for consideration/debate/deliberation for inclusion as a requirement) d. Should origin of manufacture and manufacturer be disclosed on certificates? This should be carefully considered: e. E. g. 'made in China' / 'made in USA'. f. Clear definition for made vs. manufactured (i.e. where the LGM was grown, versus where the LGM was cut/polished/set in jewellery) >> differential should be clear. g. Grading for LGMs >> should be differentiated from natural diamond/gemstones certification. If compared side by side, it should be immediately obvious that there is a difference between natural and LGM certificates from a consumer lens, and be clear specifically what the differences are. h. Technical baselines / standards? i. Need to consider assessment for clarity/ colours and inclusions for LGDS as these are different for LGMs versus natural stones. (please note that carat and cut remain the same across LGM and natural) a. Therefore, should labs collectively agree/align on the overarching standards for these for LGMs which the RJC	Noted. (b) – Requirements should mitigate a risk or provide information that allows consumers make informed decisions, any requirements to grading certificates should consider these criteria. Grading requirements should only be applicable to appropriate members of the RJC, i.e. gemmological laboratories.

		should reference in the standard? (i.e. is GIA 'f' LGD the same as an IGI 'f' LGD?) j. The rationale for this to protect the consumer and ensure they are not being misled k. If the RJC member is issuing it 'own' certificates >> the member should have to comply with the grading provisions for laboratories, unless there are specific exemptions due to context (can only be determined once the provisions are formally articulated) l. Should review additional considerations that might need to take this scenario into consideration Perhaps can issue guidance on 'Dos and don't's' once standard is written	
51.		The RJC should define a separate standard for the LGM value chain. Where there are provisions that overlap, (e.g. anti bribery etc), these should be fully aligned between the two. Membership >> RJC should clearly specify how to manage Member companies that are dealing in both LGMs and natural jewellery products in terms of the RJC COP and RJC LGMS certification. a. Standard should support LGM jewellery businesses in certifying against RJC COP for component metals in the jewellery.	Noted.
52.		how pricing is handled for lab grown stones versus natural	This would not be in scope of the RJC.
53.		Traceability /provenance and eco marketing claims should be accounted for within the LGMS standard and the Member should be required to ensure that they are verified through assurance-based approaches (e.g. 'LGM producer is carbon neutral') a. See FTC green guides as a starter	Product disclosure and claims about the provenance or environmental impacts of products will need to be fact based. Our standard will need to ensure that consumers can make informed decisions and any marketing or information that could mislead a consumer will need to be amended.
54.		Traceability: Enhanced provision 28 for traceability.	Noted.
55.		Natural diamonds have taken a long time to get traceability of them, a lot of issues could arise from source/manufacturing method of stones from Russia and China. Origin is important for consumers, they want to know where the diamond was produced.	Noted.
56.		For traceability could have a QR code system to ensure the tracking of diamonds. For stones 50 carats or above. To prevent mixing. Could alternatively have different coloured labels for distinguishing between natural and lab grown.	Your comments have been noted.

		Perhaps could require they are stored in different safes? or different staff members deal with the different stones? (although may not be feasible for very small companies with limited employees). Should give recommendations to companies on how to securely handle and segregate between natural and lab grown.	
57.		Segregation of LGM and natural stones is essential. An option could be segregation of workforce could be an option – but would likely only be applicable to RJC members who are big enough to segregate workforces. This may not be feasible for small companies dealing with both. Yet, there is a risk with small number of staff that stone swapping can occur. Need to make sure different materials are being dealt with at different times to mitigate the risk. RJC 2019 COP does already require segregation of diamonds and there are risk assessments on this.	Noted.
58.		And why is it important to segregate EHS and HPHT when risks are essentially the same? e.g. some retailers may have supply of lab-grown diamonds that are produced with both technologies?	Segregation would only be important in this example if members made specific provenance claims or marketing claims about the particular production method. Therefore to ensure that the consumer is provided with a stone of their choice.
59.	Carson	Not separated as they are both diamonds however it's vital there is clear, transparent communication that highlights what they are. The simple differences (but not to speak ill) of each of them to let customers decide.	Noted.
60.	Aarón Pita	In terms of traceability, the traceability documents (invoices, certificates, transfer documents etc) should clearly state its origin, specifying at least the country of origin of the laboratory and including a statement indicating that are LGD	Noted.
61.	Mr. Clair Rasmussen	Flawless separation. The trade should provide some way to separate lab grown diamonds in an affordable way to retailers.	Noted.
Question 2: What specific areas do you believe can and should be included in the proposed RJC LGMS?			
62.		method of fabrication, place of fabrication ("made in") for rough, place of cutting	Your comments have been noted.
63.	Georges van Tieghem	Full disclosure - Product integrity - Segregation	Noted.
64.	Allison Charalambous	Labor compliance at the grower and rough manufacturer level. Traceability at the polished wholesaler level.	Noted.
65.	Alan Cohen	Why are you giving false veracity to a product that is intrinsically part of the costume jewellery business?	LGMs are becoming increasingly prominent in the watch and jewellery supply chain. The RJC looks to ensure the responsible businesses of the entire supply chain for all

		You should not be involved. Would you do the same for Moissanite or cubic zirconia?	materials that are relevant. An expansion of scope to the COP is being considered.
66.	Canadian Jewellers Association	Definitions Nomenclature Disclosure/Transparency Acceptable Advertising standards	Your comments have been noted.
67.	Massimo Ippolito	All areas have been included and at this time the areas to indicate are sufficient to define a standard start	Noted.
68.	Effie Marinos	all requirements on managing supply chains, due diligence, labour standards and health and safety. I believe environmental impacts need to be looked at in some detail to ensure that manufacturers are managing resources appropriately.	Your position and comments have been noted.
69.	Alex Schlindwein	disclosure of lab-grown diamonds and where they are made and how they are made, treatment or enhancement properties and trace elements.	Noted.
70.		synthetic coloured gemstones have never needed a SMS ! why is it different for synthetic diamonds ?	The standard will include both laboratory-grown diamonds and coloured gemstones.
71.	Michael Lebowitz	The commonly used method of growing and the difference between what we are presented as Grown vs HPHT' In turn, the advantages and possible disadvantages between the two. From an appraisal standpoint, how to state beyond the basic 4 C's and the lab grown disclosure what else we can do to protect the industry and the consumer in written form.	RJC will require that these standards are verified by third party accredited audit firms, subject to re-certification and mid-term reviews (where applicable) and also reviewed and updated as per our ISEAL membership.
72.	Mr Clair Rasmussen	Inexpensive, easily detectable doping to the material to make it easily detected. Like the way CZs are currently detectable from diamonds- with an inexpensive machine.	Noted.
73.	Carson	Post treatments	Noted.
74.	Douglas M Liebman GIA GG	Proper representation and marks laser inscribed	RJC will need to include methods of identification as well as laser.
75.		Educating the public	Noted.
76.		Ethical sourcing, manufacturing, sustainability practices and international grading system.	Noted.
77.		Identification, source, grading, type of production, environmental impact or sustainable methodology	Noted.
78.		Social impact, available and verifiable environmental impact, manufacturing processes, after growth treatments	Your comments have been noted.
79.	Zulu Ghevriya	Growing Process Declaration	Noted.
80.	Dave Rossi	methodology, grading certification	Noted.

81.	Ya'akov Almor	The adoption and proliferation of existing ISO standards	Noted, similarly to how the diamond terminology guidelines are built using ISOs, RJC will align with applicable existing ISOs and other initiatives.
82.	Edward Asscher	there should not be such a standard from the RJC	Your comments and position have been noted.
83.	Jeffrey Fischer (representing IDMA/DMIA)	We think that every standard presently pertaining to natural should apply to lab grown. Cases that for some reason may not be applicable or reasonable should be dealt with on a requirement-by-requirement basis (obviously without bias one way or the other).	Noted. As stated earlier having one standard that is applicable to all materials within a members scope would be a simpler and most cost effective solution, however we will need to ensure that this approach meets and issues and risks appropriately.
84.	Ronnie VanderLinden Pintura - Primo	Any similarities between the current diamond guidelines should be reviewed. No reason for a different standard. Any differences to be applied.	Noted.
85.	Keyur	Human Resources especially at grower side...	Noted.
86.	Wade Abel	Ethical disclosure; transparent communication of the environmental impacts (beyond self-promoting marketing); Statements of growth method; handling of laboratory-grown materials; separation of laboratory-grown and natural materials	Noted.
87.	Jeremy Keight	best to cover as much as possible leaving no room for loop holes	Noted. All RJC standards are subject to ISEAL standard setting code, so will be reviewed and updated when needed.
88.	Martin Leake	understand the risks are different than mining. Its an industrial process so same risks as with diamond manufacturing. Keep the one standard. Ensure disclosure is clear and acceptable to all parties. Do not be dominated by one sector with a commercial conflict of interest	Noted.
89.	Jennifer Hillard	A full LCA of the environmental and social impacts of lab grown stones.	Noted.
90.	Nrapendra Kumar	Consultation to manufacturers	RJC has engaged with a number of laboratory-grown diamond manufacturers during the consultation process and ensure that we continue to engage with manufacturers as the standard is developed further.
91.		Most important is to clearly differentiate between "diamonds"(), which are formed by nature, without human intervention during its formation, that may subsequently be modified by normal lapidary practices,) and "laboratory-grown diamonds"(), which are artificial products and made by man.)	Noted.
92.	Aarón Pita	The methodology used to create the LGD such as, but not limited to, HTHP or CVD as both require a carbon/diamond seed. It is important to determine if there is any type of mined material.	Noted.
Question 3: If you handle and / or trade in both Natural and Laboratory Grown products what, if any, are the differences in how the two products are handled?			

93.	Thomas Chatham	None. If we didn't do it correctly we wouldn't be in business for 85+ years.	Noted. If there are no differences to how the products should be handled then compliance with the standard will be easily demonstrated.
94.	Sean Moore	The LGD merchandise has a specific price tag color and is displayed in it's own case or space. The majority of our earth mined diamonds have GIA reports, whereas our LGD centers and loose have GCAL reports.	Noted.
95.	Effie Marinos	Do not handle. We see some level of segregation in the management by companies - would be good to ensure this is strictly enforced.	Noted.
96.	Allison Charalambous	Traceability for lab is shorter than natural. But the challenges lie with traceability from polished wholesalers because their tracking systems are less robust than natural. Manufacturers of rough lab grown goods are not familiar with labor standards or social compliance audits and are resistant. Growers are protective of their IP and also resistant to auditors visiting their facilities. There appear to be few vertical operations in lab grown. What is more common is a wholesaler purchasing from various subcontracted manufacturers or polished suppliers.	Your comments have been noted.
97.	Sean Moore	The LGD merchandise has a specific price tag color and is displayed in it's own case or space. The majority of our earth mined diamonds have GIA reports, whereas our LGD centers and loose have GCAL reports.	Noted.
98.	Alex schlindwein	we require customers to sign a statement on the sale receipt stating that they acknowledge that they are purchasing a lab-grown stone. Natural and lab-grown stones are displayed separately so they cannot be mixed up. We only sell lab-grown stones that are laser inscribed LG on the girdle	Your comments have been noted.
99.	Martin Leake	No mixing Clear separation of of products Correct nomenclature Celebrate positive features of your own product	Noted.
100.	Michael Lebowitz	With the brand I've been consulting for ("Be Baby" bebabybridal.com) we purposely use a red tag on the product so the retailer won't confuse or place the item in with Natural goods. We are having produced a very small string tag which can only be cut off as opposed to removed easily that states, "Lab Grown Diamond" and our logo.	Noted. We can incorporate these actions as examples within our training and documents.
101.	Mr. Clair Rasmussen	I refuse to handle or buy them- because they can't be separated without expensive equipment.	Your position is understood. RJC will be providing guidance on segregation approaches that all companies can achieve.

102.	Carson	Not separated as they are both diamonds however it's vital there is clear, transparent communication that highlights what they are. The simple differences (but not to speak ill) of each of them to let customers decide.	Noted.
103.		100% visibility of materials and quality disclosure is necessary at the point of sales and after service. The disclosure should not only limited in packaging and marketing but also stamping on the jewelry or engraved on the stone itself for larger carat.	Noted.
104.	Zulu Ghevriya	It is very common product and can be handled by same company at same place without increasing any burden on the company. Most important is Declaration , separate identity of product and education at possible stages is very important. Declaration of product at Web, Invoices, bill, purchase bills, brochures, marketing materials etc..	Noted.
105.	Dave Rossi	If the time comes when I do sell lab grows, I will use them as a stepping stone to show the customer that natural daimonds is the only way to go, as it has been for hundreds of years.	Your position and comments are noted.
106.	Ronnie VanderLinden Pintura - Primo	Separate companies. We separate the natural from lab grown. Natural and Lab Grown are not out at the same time on anyone's desk to prevent any accidental mixing of natural and LGD.	Noted. We can incorporate these actions as examples within our training and documents.
107.		No difference in quality evaluation. Full explanations of both products added values. Separation for inventory control.	Noted.
108.	Richard Chetwode	Obviously, security isn't as important for LGD because the value is so much less.	Comment noted.
Question 4: What, if anything, is unique in how Laboratory Grown products are processed or handled at all supply chain points?			
109.	Thomas Chatham	There is no significant differences between the two products of the same type. They are handled the same, regardless. The rough is cut the same on the same machines.	Noted.
110.	Sean Moore	We hope earth mined melee and parcels are kept separate from LGD melee and parcels at all levels.	Noted.
111.	Alex Schlindwein	We are a retailer so we can't answer this question but we believe that they should be handled the same as natural stones. Melee lab-grown stones should be held far away from natural melee so that they do not get mixed up.	Your comments have been noted.
112.		Same process as for natural diamonds. Less environmental / mining issues like environmental waste, community approval etc	Noted.
113.	Michael Lebowitz	The cost effective plastic diamond grading reports fall far short of giving the consumer the full story about the gem they are buying. While I	Noted.

		understand why we use them, we need to improve upon our presentation and treat Laboratory Grown with the same respect level as natural.	
114.	Carson	Long as labeled accordingly. I also think all the LGD stones should be girdled lasered. (Over 10pnts)	RJC will need to include other methods of identification as well as laser.
115.		From manufacturer to retails, lab grown products should come with some sort of labeling to clearly communicate the difference throughout the full supply chain process.	Noted.
116.		Growing pattern is not matter now since every grown diamonds is falling in 100% diamond categories and approved by FTC. Growing patter declaration will be marketing points for the companies who grow them. Since we only know the pattern of grown could be important for someone where we heard of patent issue but this could be commercial benefits for any particular companies. As trade standard it should be important to declare what are the growing pattern. eventually it will help industry to settle down the dust and help to set up the pricing structure,	Noted.
117.	Jeffrey Fischer (representing IDMA/DMIA)	But we never put both products on the same memo or invoice, and recommend that separate memos, invoices, etc. with appropriate descriptors/disclosures always be required. Answering personally, we keep everything segregated; separate companies; inventories completely separate and handled separately (cannot have both products on the table at the same time to prevent accidental mishaps). Representing IDMA/DMIA, the same procedures should be required. However requiring separate companies might be recommended, but probably can't be required.	Noted. Separate companies, staff, premises etc is certainly a strong approach to segregation, but not a mandatory requirement RJC could make of its members.as cost could be prohibitive for small members. However we will include as suggestion as an approach for segregation together with other approaches.
118.	Ronnie VanderLinden Pintura - Primo	We ship natural and lab grown together. Lab grown is a separate company and separate memo. Lab Grown and Natural are NEVER on the same memo or invoice.	Noted.
119.		LG's must have certificate laser identification.	Noted. As stated earlier RJC will need to include other methods of identification to solely laser.
120.	Wade Abel	Laboratory-grown materials should be handled separately from natural throughout the supply chain, until they may be combined based on jewelry design; at which time they must be identified as such and documentation of this identification must travel with the material through all points.	Noted.

121.	Martin Leake	Same as natural diamonds without the risk of mining	Noted.
122.	Jennifer Hillard	clear separation and tracing of the chain of custody will be just as critical for lab grown stones as for natural ones.	Your comments have been noted.
Question 5: Is there a need for specific standards to apply to specific growth technologies, if so, why?			
123.	Thomas Chatham	Flame fusion ruby and flux ruby, YES because FF are not identical to natural. Flux em or flux ruby is the same as hydro em or ruby. Same with CVD and HTHP diamonds...both end up identical to natural.	Noted.
124.	Alex Schlindwein	Yes, we believe that any trace elements within the lab grown stones should be fully disclosed. Also how the stone is grown cvd vs hpht should be fully disclosed	Noted.
125.	Martin Leake	Do not create a barrier to entry as people will just not join and rjc will lose	Noted.
126.		no ! just to say what you sell! diamond ,synthetic diamond, OZ , cristal	Noted.
127.	Michael Lebowitz	We need to understand and be able to explain the differences of different growing technologies, as well as HPHT. Be honest, be transparent, be knowledgeable.	Noted.
128.	Carson	Yes. Industry teachings in the process of both CVD and HPHT. It's very confusing and very few industry people know, or get it right. They can conveniently leave out steps.	Noted.
129.	Douglas M Liebman GIA GG	Only if there are differences in grading standards	Noted.
130.	Ya'akov Almor	No, this is absolutely outside the realm of RJC. Don't get into the kitchen and tell the cook how to make his food.	Comment noted.
131.	Jeffrey Fischer (representing IDMA/DMIA)	We do not see any reason. The growers may be able to provide more insight. Obviously product representation must be clear and unambiguous.	Noted.
132.	Ronnie VanderLinden Pintura - Primo	Personally I don't feel the need. We have had customers request specific growth. Though it's easy enough to identify the specific growth at the time of production; I would not make it a requirement/part of the standard.	Noted.
133.		Only insofar as to sustainability	Noted.
134.		Yes, to identify the differences in the products from different methodology.	Noted.
135.	Keyur	Yes...you can refer CanadaMark process and above which ensure the sustainability and man power practices especially in Africa, India and China	CanadaMark is only applicable to natural diamonds that originate from Canada. It does not refer to any growth technologies.

136.	Wade Abel	Depending on the material, there may be a need for specific standards to apply to specific growth technologies. Treatments may be more common with certain growth technologies that must be disclosed, depending on how you look at treatments in laboratory-grown materials.	Noted. Further consultation will be needed for the development of treatment disclosure for laboratory grown stones.
137.	Martin Leake	Not really RJC's role	Your comment and position are noted.
138.	Jennifer Hillard	Probably not - it is the environmental and social aspects of the processes that are important. It is unlikely that different technologies will require different standards. This may change as the work on the standards progresses and new technologies may emerge.	Noted.
139.		It should not needed since there is few patterns available as CVD, HPHT and As grown CVD. they all are grown diamonds which Laboratories are declaring as diamonds and they are diamonds.	Noted.
Question 6: Should any part of the growth/engineering process of Laboratory Grown products be considered a "treatment", if so, why?			
140.	Michael Lebowitz	In my opinion, we are altering the atomic structure in HPHT and thus need to explain that it is a treatment.	Noted.
141.		no--diamond is not treated in this instance--lab grown are not diamonds	Your position is noted.
142.	Zulu Ghevriya	It's not needed as Labs are clearly mentioning now post treatment are involved or not. Its fair enough information consumers are getting in certification.	Noted.
143.	Wade Abel	As the growth process is in itself could be considered "treatment" of a material to create a laboratory-grown gemstone, additional treatment to improve color or clarity could be considered an additional step in the overall manufacturing process. Considering the business of manufacturing laboratory-grown materials, for some, additional treatment guarantees a more desirable product. Is this manufacturing, or treatment?? This is a great question and could be based on perception.	This is an interesting point of what is / can considered "post manufacturing" and indeed could be based on perception. An interesting starting point could be, once the stone has been sold from the manufacturer / grower and adaption to the colour, presentation (except cutting polishing) could be considered a treatment. This would need further consultation though.
144.	Martin Leake	Not really important. If it has been used to enhance the product and is part of a patented process maybe but honestly this is not what the RJC standards should be about. Refer this to CIBJO Blue Book or FTA	Product disclosure for any material is an essential part of RJC standards. They will refer to descriptors already established by other initiatives, but the requirement to disclose treatments will be included in the standard.
145.	Thomas Chatham	No. Lab grown is covers everything done to make a stone. A natural diamond, however, is not "ununique" if treated and thus effects value.	Noted.
146.	Sean Moore	I have been a believer that the Lab Grown companies should have to disclose post growth treatments, similar to earth mined post growth/mining treatments. However, I understand the logic that a created article is usually less money and subject to alteration to make it similar to the natural equivalent. Not sure if I agree.	The definition of treatment and when does a laboratory grown stone become or enter a stage of "post-growth" needs to be agreed.
147.	Alex Schlindwein	Yes, if it affects the characteristics of the stone.	Noted.

148.	Andrew Hinds	If part of the process is the same, similar or equivalent to treatments for natural gemstones that need to be disclosed then these should also be considered treatments for synthetic gemstones.	Noted.
149.	Carson	post treatments must be communicated, loud and clear.	Noted.
150.	Douglas M Liebman GIA GG	Only if color enhancement or clarity enhancement are utilized through ANY means	Noted.
151.		No, it should consistently language as the synthetic gemstone unless it added additional enhancements after grown. However, not labeling synthetic/man made or lab grown is very deceiving or ambiguous from natural/genuine/real diamond.	Stone disclosure, i.e. that it is a laboratory-grown diamond is and will be mandatory for RJC standards. What will need further consultation is the definition of "post-growth".
152.	Dave Rossi	yes, all should be revealed at point of purchase,	Noted.
153.	Ya'akov Almor	No	
154.	Jennifer Hillard	No	
155.		The whole process is a treatment, with the only difference being total environmental impact	
156.	Richard Chetwode	Because the industry markets itself as selling the same product as a Natural diamond without the rarity and age, but you cant sell the natural without disclosing treatment, so it should be the same otherwise they are not comparable.	Noted.
157.		All LGDs will undergo treatment.	
158.		Difference in products that are grown quickly and treated for coloured vs those grown slowly and sold out of the chamber, difference in price.	
159.		The whole process and growth of a lab grown diamond is a treatment in itself. Anything then applied to that diamond is just further treatment.	
160.		Treatment on a natural product is legally required, you need to be careful to see what is a marketing channel versus what is protecting consumers.	Any RJC requirements aim is not to stifle member ability to market their products or material only that it is done is such a way that is clear and not misleading.
161.		Once a lab grown material has been manufactured and sold, if the new owner conducts treatment on colour is this also considered a treatment?	Noted. Further consultation on treatments for laboratory grown stones will be needed.
162.		The whole process is considered manufacturing from growing stage. Only once reach the cutting and polishing is it then changed.	Noted.
163.		Whatever is done to make the diamond reach the desired outcome is part of the development process. Not treatment. Once it reaches the colour after being changed from clear or white etc, then once reach final outcome you want – then its treatment.	Noted.
164.		Consumer should know that the stone wasn't originally that colour – if grow a clear stone then make pink – it should be shown to consumer that the colour was changed.	A point raised to this is if the end objective were to manufacture a pink stone, is this considered a treatment or

			still part of the manufacturing / growing process? Further consultation on treatments will be needed.
165.		There are the 4 C's for diamonds and the 3Cs for coloured gemstones. There needs to be an equivalent for laboratory grown products.	Noted.
166.		Stimulants like cubic zirconia and moissanites should be included in the scope. Glass and Ceramic should not.	This is already the objective, any laboratory-grown material will be included in the scope of the standard, not just diamonds.
Question 7: Should subsequent processing to the original growth/engineering process of Laboratory Grown products be disclosed, if not, why?			
167.	Martin Leake	Annealing should be declared like with natural diamonds	Noted.
168.		different combination of technologies x energy mix would result in different level of CO2 emissions for LGMS and this should be disclosed to customers (and same for natural products)	Noted.
169.		It is important to disclose the method of growth technology when communicating quality and pricing, especially in higher end products or finished goods.	Noted.
170.	Ronnie VanderLinden Pintura - Primo	Only if the "treatment" is not permanent or requires special care the treatment must be disclosed.	Further information on whether non-permanent would be needed. If natural stones have to disclose treatments, it seems only fair that laboratory-grown stones do as well, especially "post-growth" and not part of the manufacturing process.
171.	Aarón Pita	The methodology used to create the LGD such as, but not limited to, HTHP or CVD as both require a carbon/diamond seed. It is important to determine if there is any type of mined material. In terms of traceability, the traceability documents (invoices, certificates, transfer documents etc) should clearly state its origin, specifying at least the country of origin of the laboratory and including a statement indicating that are LGD	Noted.
172.		processing involving the use of chemicals in particular should be disclosed	Noted.
173.	GFUGH	No	
174.	Thomas Chatham	No. Lab grown is covers everything done to make a stone. A natural diamond, however, is not "unique" if treated and thus effects value.	Noted.
175.	Effie Marinos	all processing should be declared for all products	Noted.
176.	Alex Schlindwein	yes, this can affect the value and appearance of the stone	Noted.
177.		no; in a restaurant you don't give the recipe of the dish	RJC would not be requiring disclosure of IP or manufacturing processes. What will require further consultation is the disclosure of post-growth treatments.
178.		Post growth color enhancement should be fully disclosed.	Your comments have been noted.

179.	Michael Lebowitz	Transparency doesn't have the tendency to come back to harm the industry.	Your comments have been noted.
180.	Mr. Clair Rasmussen	Lab grown diamonds should be tracked and disclosed at every point- as they are an existential threat to the concept of rarity in the diamond trade.	
181.	Carson	Yes, everything should be made clear. Nothing to hide if we're going to have credibility going forward when asked, or it comes out at some point.	Noted.
182.	Douglas M Liebman GIA GG	Only if there are grading differences that would be designated on lab reports	Noted.
183.		Customers need all info ---transparency	Noted.
184.		It could be important information for the subject of ethical and sustainable concerns.	Noted.
185.	Zulu Ghevriya	Yes it should be clearly declared.	Your comments have been noted.
186.	Jennifer Hillard	Total transparency is essential	Noted.
187.	Ya'akov Almor	No. It is part of the commercial activity and marketing. If you like the food in a restaurant, you can ask the cook what is in it and how he made it.	Only post-growth is being described in this question. RJC are not requiring disclosure of IP or manufacturing processes.
188.	Jeffrey Fischer (representing IDMA/DMIA)	Post-growth treatments should be disclosed, although we are neutral as to the need to list the individual treatments. Any treatments that may require special care or may not be permanent must be disclosed in detail.	Noted.
189.		Could be, but seems unnecessary	
190.	Wade Abel	This could be up for debate if the treatment is considered part of the entire manufacturing process. The material is not finished until it goes through all the steps, synthesis, quality improvement (treatment), etc.	Agreed, further consultation is needed to agree on a definition of "post-growth".
191.	Jeremy Keight	Absolutely transparency on this will have an impact on price	Noted.
192.	Martin Leake	Not really important and really not what the RJC standard should focus on.	Product disclosure for any material is an essential part of RJC standards and is already a provision within our mandatory COP standard. Extending similar requirements to laboratory-grown stones will be necessary.
193.	Richard Chetwode	Because the industry markets itself as selling the same product as a Natural diamond without the rarity and age, but you cant sell the natural without disclosing treatment, so it should be the same otherwise they are not comparable.	Noted.
194.	Rapaport, Alan Cohen (and others)	All treatments of man-made diamonds to enhance colour, clarity or other characteristics should be subject to the same disclosure requirements as natural diamonds	Noted.

Question 8: What, if any, specific occupational health & safety considerations, at all supply chain points should be included?			
195.		H&S: HPHT a. Explosion risks/flying debris risks – risks of operating a large piece of equipment in pressure – should be considered in the standard. HPHT >> requires a chemical recovery stage, therefore need provisions to ensure H&S of employees involved.	Your comments have been noted.
196.		H&S CVD: a. Risks associated with raw materials >> explosive gases (e.g. use of hydrogen/ hydrocarbons) – need to be considered in the standard. Microwave tech >> microwave leaks – need to be considered in the standard.	Your comments have been noted.
197.		risk of exposure to chemicals and risk of musculoskeletal disorders due to repetitive work	Noted.
198.	Allison Charalambous	OHS at the grower and manufacturer level.	Noted.
199.	Michael Lebowitz	If there are hazards, they should be revealed.	Members complying with the COP are not specifically required to disclose H&S requirements. Unless there is a specific need (i.e. applicable law) or members compliance supports work on applicable SDGs the standard would not mandate for disclosure of H&S.
200.		Yes it should included for manufacture safety inspection.	Noted.
201.	Martin Leake	Same as natural diamonds - keep the RJC standards simple	Noted.
202.	Martin Leake	Risk based same as for natural diamonds. Keep the RJC standard simple. It is an industrial process so similar to manufacturing of diamonds	Noted.
203.	Alex Schlindwein	the same as what is considered in natural production and distribution	Noted.
204.	Ronnie VanderLinden Pintura - Primo	The same standards as natural are to be applied to Lab Grown.	Noted.
205.	Rapaport	Same as required for natural diamonds.	Noted.
206.	Jeffrey Fischer (representing IDMA/DMIA)	Same standards as natural. Hazardous materials and processes are hazardous materials and processes...	The COP already covers H&S issues, the laboratory standard will need to provide guidance on specific H&S considerations to both members and auditors, if applicable.
207.	Carson	Not that I'm aware of other than the factory process requirements.	Noted.
208.	Douglas M Liebman GIA GG	If OSHA or any other global governmental agencies require, then all of those requirements must be met	RJC members will be required to comply with all applicable law as a minimum.

209.	Zulu Ghevriya	Yes, Since this is machine grown Diamonds, involved Machineries, Gases, Technical details etc. It important that the facilities are well safe following all safety standards and health related standards for company employees and declared sources of related materials. As I mentioned Growing part is most important in whole pipeline. So it can be separate for the certification from further pipeline as well.	Noted.
210.	Dave Rossi	The process should be done with maximum health & safety mandates	Noted.
211.	Ya'akov Almor	Leave that to the local regulatory authorities.	Compliance with local law is a basic requirement of RJC standards.
212.	Wade Abel	Factory safety; general manufacturing safety; eye protection; heat and exposure protection	Noted.
213.	Jennifer Hillard	Any impacts on occupational health and safety should be taken into consideration in developing the standard	The COP already covers H&S issues, the laboratory standard will need to provide guidance on specific H&S considerations to both members and auditors if applicable.
214.	Nrapendra Kumar	Use of complete PPE 's and SOP shall be followed at stages.	Noted.
215.	Richard Chetwode	human rights, no child labour, minimum wages.	Noted.
Question 9: What, if any, specific environmental considerations, at all supply chain points should be included?			
216.		use of water, CO2 emissions, use of chemicals land use	Noted.
217.	Allison Charalambous	Energy sources and consumption levels at the grower level	Noted.
218.	Sean Moore	I understand the LGD argument about the environmental benefits but I also understand it takes substantial energy to grow diamonds and not certain growing diamonds is better than mining diamonds.	There has been a number of studies done for both mining and laboratory-grown stones. RJC will not conduct these studies itself, but it will require that if any RJC member makes marketing claims or product claims on the environmental impact of the materials it sells, these will need to be evidenced and accurate.
219.	Effie Marinos	Resource usage	
220.	Alex Schlindwein	the carbon footprint of producing the gem, how much electricity, gas and water it will use to make it	Noted.
221.		Do not try make up risks	The RJC is seeking stakeholder input to better understand the risks that are applicable or unique to the LGM supply chain, as well as those that are not. Your input has been noted .
222.	Michael Lebowitz	We tend to market the idea that Lab Grown is totally "Green". We need to be honest and be able to qualify such a claim.	Noted.

223.	Carson	There needs to be a specific and accurate eco footprint that is provided by the growers. Stop the smoke and mirrors and communicate the energy requirements, create an appropriate carbon plan. Carbon neutral goal?	RJC will be looking to include guidance on how members (selling both natural and laboratory-grown and other RJC scope materials) can conduct carbon footprint analysis and how we can implement verification of carbon neutral products where applicable.
224.	Douglas M Liebman GIA GG	Use of clean sustainable energy	
225.	Richard Chetwode	Carbon emissions (including from the manufacture of the lab equipment. Carbon emissions from production. Social benefit... in the same way that listed companies have to produce an ESG/sustainability report.	Noted.
226.	Zulu Ghevriya	Yes, In fact RJC should openly come up with declared carbon emission uses for the particular company in growing or full pipeline. I'm suggesting to RJC as CO2 emission is becoming and going to become the biggest trigger point in consumer's mind it should be apply one more standard for even natural industry and lead whole industry towards better future. (I have suggestion to introduce like CO2 counting meter for every segment of industry) Not only Lab grown but every part of the luxury industry should apply some sort of CO2 emission control and way to compensate the uses of carbon. RJC is actively involved in UN SGD 17 goals and this will be the biggest step towards it . It can be discuss in details where smallest firm in our industry also can participate.	RJC will be looking to include guidance on how members (selling both natural and laboratory-grown and other RJC scope materials) can conduct carbon footprint analysis and how we can implement verification of carbon neutral products where applicable.
227.	Ya'akov Almor	This too, is part of the commercial activity and marketing. If you like the food in a restaurant, you can ask the cook what is in it and how he made it,	Thank you for your response, this has been noted.
228.	Jeffrey Fischer (representing IDMA/DMIA)	It would seem any such differences would be at the laboratory/growing site. We are not aware of any differences after that point. Growers may be able to provide more insight.	RJC is looking to provide guidance that would be applicable to the entire value chain, not just growers.
229.	Ronnie VanderLinden Pintura - Primo	the same as natural standards and any additional environmental concerns that apply to Lab Grown. Growers should know all environmental considerations and share any insight.	Noted.

230.	Martin Leake	same as natural diamonds - keep the RJC standards simple - stop looking for problems that do not exist	Noted.
231.		Environmental impacts should be tracked	Noted.
232.	Wade Abel	Reduction of carbon emissions by additional energy saving, or renewable energy use. Many advertise a more environmentally friendly alternative in laboratory-grown materials, however without the addition of energy saving measures, is it really environmentally friendly?	RJC aims that the guidance for all members to calculate and reporting on their carbon footprint as well as being able to demonstrate evidence to any product based environmental claim will provide some clarity for consumer and other stakeholders.
233.		A full life cycle assessment should be done of the different technologies and the environmental impacts along the supply chain. Nothing of any significance should be left out. If anything is considered insignificant, a justification should be provided for that decision and for not including them.	Risk assessment, identification and mitigation are part of existing RJC standards.
234.	Nrapendra Kumar	sustainable use of resources with complete compliance against environment laws.	Noted.
235.	Thomas Chatham	Crazy question. Diamond miners get killed every day, not so Lab grown makers??? Both are handled the same once found or created.	This question seeks to understand any environmental risks in the LGM supply chain. Your position has been noted.
236.		The social impact of both products should be disclosed and available, but must be based on verifiable, independent studies.	RJC aims that the guidance for all members to calculate and reporting on their carbon footprint as well as being able to demonstrate evidence to any product based environmental claim will provide some clarity for consumer and other stakeholders. Any claims will need to be subject to provenance claim audit.
Question 10: Are there any specific considerations to be included regarding product disclosure, nomenclature, consumer facing claims?			
237.	Jennifer Hillard	Consumers should have access to transparent and complete data (environmental and social) relating to lab grown stones. This data should not be weighted to imply that a lab grown stone is better than a natural one. That choice should be left to the consumer. No claims of preferability should be allowed to be made.	Noted. Any claims made should be verifiable, accurate and not mis-leading in anyway.
238.		Other than stating lab grown, same as natural diamonds	Your comment has been noted.
239.	Jeffrey Fischer (representing IDMA/DMIA)	EVERY claim must be substantiated - just as natural; Product disclosure and nomenclature must be clear and unambiguous - same as natural.	Noted.
240.		Consumers should understand the quality and resale value should be different from natural diamonds.	Quality of the stone should be provided by the 4Cs. RJC does not require natural diamonds to disclose any market value risks, so this will not be applied to laboratory-grown.
241.	Douglas M Liebman GIA GG	A statement should be agreed upon and utilized stating that the diamond has been grown in a laboratory, has been labeled as such and should not be in any way represented as anything other than LAB GROWN	Noted.

242.	Andrew Hinds	Natural should be described as natural or mined. Synthetic should be described as synthetic or lab grown - although the term 'laboratory' is arguably misleading in this context, it is the most commonly understood term.	Recognised terms used in existing industry guidance such as the Diamond Terminology Guidelines will be referenced.
243.	Allison Charalambous	Any claims related to "sustainable" lab grown should be verified by the energy consumption/use at the grower level.	Noted.
244.	Georges van Tieghem	The current nomenclature of "laboratory grown" is OK, but if the Lab Grown Products are treated, that should be mentioned as well. Furthermore, the standard should include provisions to avoid "false" statements when comparing Lab Grown Products with Natural Products.	Noted. Please see above comments about further consultation needed on post-growth treatments and their disclosure.
245.		The social impact of both products should be disclosed and available.	Social impacts would be an interesting metric, however there would need to be considerable work done to verify over a defined period of time to provide a summary of those impacts. Whilst it won't be applicable for this version of the laboratory-grown standard, it will be a subject to be re-visited for future reviews.
246.	Ya'akov Almor	Full disclosure. As prescribed by existing ISO standards and by the FTC in the USA.,	Noted.
247.	Canadian Jewelers association	Environmental impact facts. Any and all claims made about LGMs, whether they be eco-friendly, sustainability, environmental, ethical or of origin, must be proven with facts. Any claims that are vague, non-specific, incomplete, or irrelevant should not be used. Transparency is paramount throughout the supply chain ultimately ending with clarity for consumers. See https://canadianjewellers.com/CJA-Industry-Guidelines	Noted and thank you for the reference to the CJA guidelines.
248.		Yes it should include documentation of environmental impact to verify any marketing claims. There should be documentation that is provided by the industry bodies for consumers. Consistent and same messaging for all.	Any marketing claims about the provenance of the RJC scope materials will be subject to auditor review, as per the RJC COP provision.
249.		Must have enhanced disclosure requirements on Laboratory Grown materials.	
250.		Must be complete disclosure to the buyer [anywhere in supply chain] that it is not a natural gemstone or diamond but it is human made. Very clear product disclosure. Disclosure to labs also needs to be included.	Noted.
251.	Mr. Clair Rasmussen	specific language and branding to make sure consumers know they are not buying an earth produced diamond- and that the lab diamond is NOT RARE.	Noted. RJC members will be required to comply with appropriate disclosure on all RJC scope materials.

252.	Sean Moore	Lab Grown material must be disclosed at all times and at all points. The consumer must know, accurately, what they are buying. There is no room for error regarding full disclosure.	RJC members will be required to comply with appropriate disclosure on all RJC scope materials.
253.	Alex Schlindwein	full disclosure from beginning to end of the buying cycle	Noted.
254.	Nrapendra Kumar	Complete product disclosure required.	Noted.
255.	Ronnie VanderLinden Pintura - Primo	Lab Grown must be disclosed from grower to consumer. As far as nomenclature, it must be easily understood and identifiable to the consumer.	RJC members will be required to comply with appropriate disclosure on all RJC scope materials and nomenclature will be based on existing and recognised industry guidance.
256.	Effie Marinos	Must be clear on what the product is and particularly what claims are being made in relation to Lab Grown products being more ethical etc!	Noted.
257.		Product disclosure to consumers must be included - misleading consumers with advertising needs to be in scope. Providing clear and transparent information will enable the consumer to make an informed decision. Consumers should also be aware the cost difference is due to the difference between laboratory grown and natural.	Noted, however as noted in previous comments that market values will not be included, unless this is being made as a marketing or product claim. Any requirements for companies to disclose future values of products will not be in scope of the RJC.
258.		Lab grown vs as grown colour, coloured diamonds can be grown, they can then be irradiated – consumers should know this has taken place. This is a technical layer of process that impacts the value and process of the stone, it is quite rare to have high quality coloured grown diamonds. We also don't want to overwhelm the consumer; provide clarity to producers and consumers, it has to mean something to the consumer.	Noted.
259.		We can strengthen the exiting product disclosure section of the current COP – no need to rewrite.	Noted. Indeed, the current COP covers a significant amount of requirements that would be applicable to laboratory-grown stones.
260.		Environmental disclosure and transparency is essential – disclosure of GHG CO2 for each step of the process. Consumer facing disclosures also need to be addressed. But needs to be accurate and effective. e.g. would disclosure requirements pertain to a company's full GHG emissions or only the ones associated with the individual stones produced, i.e. Would it be a requirement for product foot printing or just general disclosure? consideration to make scope 3 disclosure mandatory, however will need some phasing in.	Noted. Phase 3 would need some further time and understanding, however as more companies are able to calculate and provide information for customers/ downstream, this should become easier to include. It would be good to start with general disclosure of carbon and as members go their understanding and ability to calculate and report improves requirements can be made to include a product level calculating and reporting.
261.		Would be useful if RJC can calculate or verify the carbon impact of a stone or organisation.	Noted. RJC will be looking into this and seeing where requirements/guidance can be added.

262.		Need to recognise even some laboratory grown material includes mined materials. Seed material needs to be considered. would GHG disclosure include other air emissions? if so what ones?	GHG disclosure requirements will be subject to further consultation. We need to ensure that any requirements set are achievable by anyone in RJC membership and may need to introduce a phased approach to ensure that we do not create a barrier for entry.
263.		Carbon Neutrality needs to be validated by the RJC that's the kind of thing for consumers, energy consumption etc.	Noted.
264.		Under disclosure, HPHG stones may be better quality – harder to buy.	Any claims around quality of a stones creation method would need to have supporting evidence available for scrutiny and disclose the metrics of which quality is being measured.
265.		Disclosure and verification of claims made around environmental statements. How these statements are supported and verification of this. Must be verifiable by an auditor. Refer to De Beers DPP for something similar.	Noted.
266.		Is there a requirement to disclose rose gold versus white gold? No recognised requirements around caratage. Point of information the FTC does require this.	Metal finesse is required to be disclosed as per the COP, but for this consultation on laboratory-grown stones, this is not applicable.
267.		HPHT use acids to dissolve. This would be important to disclose	Noted.
268.		If RJC member submits a stone for grading and appraisal - when handover it has to be disclosed its a lab grown stone.	Noted.
269.		key considerations in addition to general requirements on disclosure (aligned with what is in the COP): a. Factual accurate claims on product categorisation (certified vs uncertified); treatments b. Products sold under the LGMS should consider and disclose (to the auditor) the full value chain of how they were created to the end sellable state c. Method of synthesis should be disclosed at the appropriate level d. Location of synthesis should be disclosed at the appropriate level e. Terminology / definitions a. ISO 18323 guidance to be followed f. Critical Breach >> in event of a deliberate attempt to sell LGM as natural, outcome by RJC should be termination as a member in addition to the reporting to relevant authorities etc. E.g. treatments applied to make the LGD look like natural (with no other commercial imperative).	A: noted. B: Noted however if downstream actors (traders / retailers) are not provide information on method of production, as long as they are disclosed as laboratory-grown stones, this should be considered a minimum. C: Noted. D: Further clarification is needed why location of manufacturing should be disclosed and what risk this is mitigating or consumer concern this is addressing. Natural stones currently don't have a mandatory country of origin disclose requirement. E: Noted. F: Noted, but evidence of a deliberate attempt to mislead on a sale will be difficult to provide during and RJC audit or complaint mechanism submission, unless evidence is provided.

270.		Detailed provision on responsible sourcing of LGMs a. Human rights DD framework b. Environmental Reporting requirements by LGD manufacturers i. Energy types/usage/etc ii. Public reporting on Human Rights DD	A: noted, it would be the same as COP 6 requirements and aligned to UNGP on business and human rights. B: noted B ii: Is a requirement of COP 6, so would be included here.
271.	Rapaport	The following statement should be required on all marketing material, grading reports and invoices for man-made diamonds. “Man-made diamonds do not appreciate in value like natural diamonds because they can be created in unlimited quantities and are not subject to the same supply limitations as natural diamonds.”	Noted. However as stated above, RJC will not implement any provisions or guidance to the market values of commodities, unless mis-leading marketing or product claims are being made that are not accurate or can be substantiated.
272.	Rapaport	Numerous suppliers of man-made diamonds emphasize that they are the same as natural diamonds. They do not disclose that man-made diamonds are fundamentally different from natural diamonds in their ability to retain value over time. Some RJC retailers make false or misleading statements regarding the ability of man-made diamonds to retain value. (2) Statements that it is “unknown” if man-made diamonds will retain value are false and misleading. In fact, there is sufficient information and data showing that prices for man-made diamonds decline significantly over time. Consumers are subject to partial disclosure or outright misinformation which makes them think that man-made diamonds are the same as natural diamonds regarding value retention. Partial disclosure that misleads consumers is an unethical and illegal business practice Full disclosure regarding the inability of man-made diamonds to retain value like natural diamonds should be required on all marketing material and invoices for man-made diamonds by all ethical members of the jewelry trade, including RJC members	Noted. Please see above.
273.	Rapaport	Retailers to take proactive measures to ensure that consumers are aware that prices for man-made diamonds will most likely decline significantly in the years ahead.	RJC always requires it members to make truthful and accurate disclosures on all the characteristics of the products that they sell. RJC members must sell products and materials in accordance to applicable law and recognised industry practices and standards.
274.	Rapaport	In the event the RJC is confused about whether or not consumers are mislead by the current practice of partial disclosure by RJC members an	There are legal requirements about not misleading consumers and RJC members must comply with applicable law.

		independent impartial public survey of consumers should be made by RJC.	
275.		2. Martin Rapaport Comments Regarding Failure Of Full Disclosure Regarding Value Appreciation The idea that diamonds are a store of value is a fundamental component of diamond demand. Consumers are being misled by retailers who sell man-made diamonds without full disclosure. The default assumption among consumers is that man-made diamonds will appreciate over time, even though the opposite is true. The price of man-made diamonds will significantly decrease over time as they have for other man-made gemstones. The cost of creating man-made diamonds will continue to fall as their supply increases using lower cost technologies. Many if not most consumers will be sorely disappointed when they try to sell their man-made diamonds and learn that their value has decreased from thousands of dollars to hundreds or even tens of dollars. Essentially man-made diamonds at the current price level are unsustainable. The current level of “frenzy” demand is driven by windfall profits provided to retailers who fail to make honest full disclosure. The sad fact is that the diamond industry is trading short-term profit for long term reputational integrity. Consumer expectations are not being managed honestly by unethical retailers. When consumers find out about the true long term value deterioration of man-made diamonds the free-rider windfall profits will crash. Natural diamond demand will suffer significant damage as consumers learn the truth about man-made diamonds. The only solution is for retailers to take proactive measures to ensure that consumers are aware that prices for man-made diamonds will most likely decline significantly in the years ahead. Abraham Lincoln advised. You can fool all the people some of the time, and some of the people all of the time but you can not fool all the people all of the time.	Unless an RJC member is making a mis-leading or inaccurate claims, we will not include any requirements around market values of commodities with the RJC standards.

		It's time for the RJC to ensure their members tell the truth about man-made diamonds all of the time.	
276.	Wade Abel	Yes. Clear communication of what the material is. There are regulations set forth by the United States FTC that require some of this. Clear communication means no room for ambiguity or the ability to deceive or misinform the consumer or industry about what the material is.	Noted.
277.	Alex Schlindwein	How the stone is grown cvd vs hpht should be fully disclosed	Noted.
278.	Martin Leake	Full disclosure along the CIBJO blue book and FTA	Recognised industry nomenclature will be referenced.
279.		Lab grown diamonds should only ever be marketed as having physical, chemical and optical properties SIMILAR to natural diamonds. They ARE NOT THE SAME AS, NOR ARE THEY IDENTICAL TO. 1. The fact that there are differences in all three categories is exactly what enables them to be detected. Lab grown diamonds do not have the same physical properties in the rough. The differences are clear to the naked eye. 2. The fact that there are chemical differences, which are identifiable under advanced photo-luminescent spectrometry, proves the origins of lab grown diamonds. 3. The fact that lab grown diamonds show inclusions not seen in natural diamonds, proves they have different optical properties. FULL DISCLOSURE MUST BE MADE THAT LAB GROWN DIAMONDS MAY BE SIMILAR TO NATURAL DIAMONDS, THEY ARE NOT THE SAME AS. THEY ARE NOT GROWN UNDER THE SAME CONDITIONS OF HEAT, PRESSURE AND TIME. THEY ARE DETECTABLE BECAUSE OF THESE DIFFERENCES.	Noted.
280.	Carson	There should be documentation that is provided by the industry bodies for consumers. Consistent and same messaging for all.	Noted.
281.	Dave Rossi	Lab grown are going to be a disaster to the public. There will be jewelers that will intentionally and unintentionally not disclose the fact that they are lab grown	Product disclosure will be a key component of this standard and support companies with demonstrating their responsible practices.
282.	Ya'akov Almor	Yes, use the ISO Standards, consult IDC and CIBJO documents	Noted.
283.	Richard Chetwode	Too many LGD players use misinformation and innuendo to promote their product.,	Product disclosure will be a key component of this standard and support companies with demonstrating their responsible practices.
284.	Richard Chetwode	Proof of origin of the LGD to be declared. Honesty in revealing where the LGD was cut and polished and honesty in marketing the product.	Noted. However further clarification is needed why location of manufacturing should be disclosed and what risk this is mitigating or consumer concern this is addressing.
285.		A clear and simple definition of LGM must be defined, and specify it excludes doublets/coated CVD.	Noted.

		a. there are generally understood definitions of hybrid within the industry >> which can be a sequential process of CVD followed by HPHT, which should be considered. b. Sub definitions of specific LGMs should be provided, i.e. LGDs, LG Gemstones, etc. c. Clarify position on LGM material used for non-jewellery uses (confirm it is out of scope). These can all be followed by tertiary treatment methods to generate colour.	C: Further information would need to be provided on non-jewellery uses. If it is for industrial purposes those companies would not be able to join the RJC.
286.		Standards on misrepresentation with respect to comparative claims by LGM producers pertaining to natural diamonds' ESG impacts and eco-claims a. Baseline: adhere to legal requirements b. Claims need to be accurate, justified, substantiated, truthful etc (see De Beers' statement of principles for example). i. E.g. 'LGDs are identical to natural diamonds' >> (technically they are not) c. Grievance mechanism should be required for stakeholders to raise	Noted. C: RJC already has a complaint mechanism in which anyone can use to report an RJC member's standard compliance. All members also have grievance mechanisms built into COP provisions, so this can easily be adapted to include laboratory-grown stones.
287.		CZ or imitation diamond sellers are using the language of lab grown diamonds to sell their imitation products, and thereby charging higher prices for fake products. Is this something that can be addressed?	If the language used is mis-leading, cannot be verified or is making un-substantiated claims then as RJC members they would need to amend this to comply with the standards requirements.
288.		Synthetic diamond manufacturers would like to promote the term "cultured diamonds" which would take them out of the realm of artificial products, but there is no analogy between the two processes. It is a fraudulent name that would trigger a large movement of pearlers around the world. « Cultured » means « The growth of biological material, microorganisms, animal tissue or pearls with human intervention, in specially controlled conditions ».	Noted. Further consultation on this term and its implications (consumer confusion) to other commodities, such as pearls will need to be fully understood before RJC standards can make requirements.
289.		You shouldn't accept the abbreviation "lab" term. The word « laboratory » should appear in full because it can create confusion in the consumer mind... Are you planning to exclude the term « synthetic » for the laboratory-grown diamonds ? Even the FTC is using it, and of course, the french Decret 2002.	Noted. Synthetic as a term is permitted under certain local applicable law (as noted) RJC would not be in a position to conflict with local applicable law in such a way. However we can recommend that other terms are used in preference to others. If RJC were to provide a list of recommended descriptive terms, this will need further industry consultation.

290.		The 2Cs should only be used for natural diamonds. A new nomenclature should be developed for synthetics.	As long as a consumer is fully aware that they are purchasing a laboratory-grown stone, describing its physical characteristics: colour, clarity, cut and carat should not cause confusion.
291.		Throughout the standard we need consistency in terminology, e.g. what does "gem-based material" mean?	
292.		Clarification needed when referring to "seed materials" in the standard, e.g. when producing lab-grown diamonds the seed materials are essentially high-purity methane gas and hydrogen (+ a small synthetic diamond), most often produced by use of natural gas. Synthetic rubies, sapphires and others use some mined material. So, need to clarify if we are going all the way up to the natural gas (for lab-grown diamonds) and mining (for lab-created gemstones).	It will depends on the provision, for due diligence, this would be needed on seed materials and for carbon footprint calculations, natural gas would be included, but these are only applicable to these provisions.
293.	Thomas Chatham	Any ad or promotion should be taken and evaluated in its entirety, not cherry picked.	Auditors will need to use sampling approaches for scrutinising adverts or promotions if they member has too many for them all to be reviewed. However the auditor will chose which adverts or promotions to review, not the member.
294.	Paul Ziminsky	When discussing natural versus lab-grown diamonds, the trade should avoid describing them as "identical" when explaining that they are both chemically diamond --the term "identical" could be interpreted by some as indistinguishable.	Noted.
295.	Martin Leake	I find the term LGMS offensive and not constructive- better to use the FTA approved term and be clear that this is about laboratory grown diamonds and if required lab grown gemstones.	Your comments have been noted.
296.	Xavier Grospiron	Names of firms, manufacturers or trademarks shall not be used as descriptors for laboratory-grown, laboratory-created or synthetic diamonds unless such names are clearly succeeded by the term "laboratory-grown," "laboratory-created" or "synthetic." E.g., a business trading as Bianchi must describe its laboratory-grown diamonds as "Bianchi laboratory-grown diamonds" but not as "Bianchi Diamonds."	Noted.
297.	Jeremy Keight	there has been some discussion but very slight on the difference between "as grown" and diamonds that have received additional treatment after being grown in a shorter time scale. Will you be addressing this?	Further consultation on post-growth treatments and their disclose will be needed.
298.	Martin Leake	Do not call them Lab grown materials. Say Lab grown diamonds and lab grown colored gemstones. Try to find a way of inviting dialogue rather than closing down the conversation before it has started.	Noted.
Question 11: If you handle and / or trade in Laboratory Grown products what laboratory testing and analysis should be considered?			

299.	Georges van Tieghem	If Lab Grown Products are treated, that should be mentioned as well in the lab report	Noted.
300.	Thomas Chatham	Same as what is done to a natural diamond but have them fill in the huge holes they have left in the earth.	Noted.
301.	Ya'akov Almor	Up to the company	Noted.
302.		a. General testing requirements for all LGM should be defined with the RJC LGMS. b. Please note a key risk: LGM polished melee often includes naturals (and vice versa) >> testing requirements on melee should be robust and aligned with those for natural stones.	Noted. RJC currently used a risk based approach for undisclosed materials within the COP standard, so a similar approach could be applied within the Laboratory-grown standard.
303.	Alex Schlindwein	lab reports should be required for stones over a certain carat size and should have equipment to test for natural versus lab-grown on site. Double check system should be in place for this	Noted.
304.	Martin Leake	??? Are you trying to create barriers? Do you require this for natural diamonds? Remember what RJC standard is for	Laboratory testing is required for natural diamonds within the COP.
305.	Carson	Certain testers to be considered as acceptable, others should not be acknowledged or recommended as effective or acceptable testing.	RJC will provide guidance on what members should consider if they wish to purchase or utilise testing equipment. Whilst keeping a list of individual acceptable machinery would be onerous considering their constant evolution, overarching guidance on how and what to consider would be worthwhile.
306.		Regulatory and properties testing should performed to confirm the authenticity and disclosure. Certificate or labels must included the lab grown callout at point of purchase.	Noted.
307.	Zulu Ghevriya	Certification from International labs or Self certification	Noted.
308.	Jeffrey Fischer (representing IDMA/DMIA)	Sellers/dealers of lab grown should be required to have identification equipment (just as natural dealers should) even if they deal only in lab grown (or only natural). If nothing else, returned items and items sent out for repair present examples where possible mix ups necessitate this. Project Assure tested equipment should be recommended if not required.	Noted.
309.	Ronnie VanderLinden Pintura - Primo	Using identification - screening equipment which has been rated by project assure should be required. Anyone selling should be familiar with the products available and should also be familiar with the legitimate grading laboratory's that provide identification.	Initiatives such as Project Assure will be referenced in the guidance as a sourced of information regarding testing equipment.
310.		Same as natural.	Noted.
311.		As we work with laboratory grown diamonds, and the analysis/grading of them, we use multiple testing methods. FTIR, UV/Vis, and Photo	Noted.

		Luminescent spectroscopy as well as deep UV imaging and gemological visual analysis.	
312.		???? do you insist on this for natural diamonds ??? Be very careful. Keep it simple Full disclosure - if found not to disclose clearly then out!	Product disclosure will be a key component of this standard and support companies with demonstrating their responsible practices.
313.	Mr. Clair Rasmussen	Lab Grown Diamonds should be doped with some material that doesn't effect the diamond- but is easy to detect with inexpensive equipment. Currently I would have to buy machines costing \$12,000 to try to sort these- hence EVERY DIAMOND that comes into my store is suspect. In my opinion, synthetic diamonds will soon ruin the diamond jewelry trade- because no-one will know for sure if the diamonds they handle are earth grown or man-made. (except those with expensive equipment)	Your position and comments are noted.
Question 12: What other industry initiatives / frameworks / certifications should RJC work to align and / or harmonise with?			
314.	Canadian Jewellers Association	As stated under comments, whatever standards are developed for any segment of our industry, these standards must dovetail with any current standards and not be segmented into separate standards depending on the product.	RJC will always strive to align with existing standards where possible.
315.		The lab grown diamond and lab grown gemstones should follow the same standards of procedures and testing standards if supply of lab grown diamond continue to increase in global supply chain.	Noted.
316.	Zulu Ghevriya	Diamond (Natural or Lab) & Jewellery industry are most considerable but it should be considered for the accessories, fashion accessories, most importantly packaging and displays for jewellery industry.	Noted.
317.	Edward Asscher	I deplore this decision to make a standard for lab-grown diamonds. There should be no such standard from RJC. RJC should leave this to other organizations. it is degrading the image of RJC and confusing to the trade.	Your comment and position have been noted.
318.	Jeffrey Fischer (representing IDMA/DMIA)	Other than compatibility with individual national requirements none come to mind at this point in time. To address the obvious, carefully review those "other industry initiatives / frameworks / certifications" and learn what you can from them...	It has been a core principle for the RJC to align and recognise as many other applicable standards and initiatives as possible.
319.		Would make sense to team up with the AGA —the Accredited Gemologists Association, and international, independent organization also dedicated to creating standards and helping to raise professional standards in the gem and jewellery field. This would provide resources extremely knowledgeable about the “gems in the jewels” and the many ways in which they can be imitated, duplicated, and misrepresented...and thus, how to establish standards that cover the myriad issues this entails.	Noted.

320.	Martin Leake	CIBJO & FTA	These are already referenced in the RJC COP standard.
321.		Federal Trade Commission (FTC) very specific in its guidelines in all of the areas you're mentioning, they can be strict and expensive to violate. Problems understanding where the RJC sees the FTC as not doing it's job and if it's not then they're the ones that should be asking for help in implementing. Need to ensure alignment with US FTC guidelines that are elaborate and robust. They are very strict in making various claims; issue extremely heavy fines, they have the power that the RJC won't have in imposing fines and remedy to problems we see and if there is a problems and misrepresentation it should be brought to their attention.	The FTC guidelines and policies would be applicable for US companies as per the COP, and they cannot be in breach of the standard. There is an RJC grievance mechanism if such instances occurs.
322.		Suggest to look at ISO 55000 standard that looks at asset management. For all equipment are safe. To do with lifecycle assets etc.	Noted.
323.	Jennifer Hillard	ISO 702005 - Validation of equipment, traceability etc - there are parameters there should be included in the standard. Need to check reputability of the tested etc	RJC can provide some overarching guidance on what members should consider when having their products subjected to testing.
324.		Look at ISO 14025 for data collection on life cycle and ISO 14026 for any communication relating to a products footprint.	Noted.
325.	Rapaport	The World Diamond Council (WDC) System of Warranties (SOW) should apply to Man-made diamonds and should appear on all invoices for man-made diamonds as they do to natural diamonds.	RJC cannot mandate that its member companies apply another organisations initiative to materials not within its scope. Only the WDC can expand the scope of materials to the SoW.
326.	Allison Charalambous	SCS007 Sustainability Rated Diamond	Noted.
327.	Canadian Jewellers Association	CIBJO, Canadian Jewellers Association guidelines which align with Canadian government guidelines https://canadianjewellers.com/CJA-Industry-Guidelines .	Noted, recognised industry nomenclature will be referenced.
328.	Michael Lebowitz	Laboratory Grown Diamonds need to be treated with the same reverence as Natural, with GIA training programs first in short courses nationally, then within the normal diamond grading program. Trade organizations need to address whatever standards your body puts in place.	Noted.
329.	Michael Lebowitz	ALL the grading Labs, the FTC, all trade magazines and online daily news, and if money were available the bridal and fashion media.	
330.	Carson	Training and consumer messages. Be in-line with FTC so there is one message that is clear and concise about what the LGD are etc. No more industry "experts" giving their biased opinions on either sides of	Noted.

		arguments. Time to move on and take charge of the exact messages to be used and accepted by our industry, regardless of what your own business believes in or is supporting. There should be no sides, only factual information and get on with it.	
331.	Douglas M Liebman GIA GG	Any industry that utilizes diamonds for any other purpose than jewelry for which the difference in price or durability would be a factor	Any diamond used for purposes outside jewellery or watches are not for consideration within the scope of this standard.
332.	Ya'akov Almor	RJC should only advance the standards that already are in place.	Noted.
333.	Ronnie VanderLinden Pintura - Primo	Project assure and any other initiatives / certification process that aligns with the of the RJC	Noted.
334.		How will RJC align with the new SCS standard on laboratory grown diamonds? This question is particularly important given that the SCS standard does not align with ISO and CIBJO norms on nomenclature.	RJC would work to align with as many other initiatives as possible to ensure that members who are already compliant can use this as applicable evidence. RJC will refer to ISOs (as applicable) and recognised industry nomenclature, such as CIBJO.
335.	Jeremy Keight	i believe all manufacturers should be compliant with hall marking regulations even for the countries not yet recognising a precious metal standard. Under-karating happens and is detrimental to the industry and consumers.	Product disclosure will be a key component of this standard and support companies with demonstrating their responsible practices.
336.	Nrapendra Kumar	Social Compliance/ETI Compliance.	The ETI base code is referenced within our COP standard and this will be extended to other RJC standards.
337.		Diamond Terminology Guidelines	Noted.
338.	Richard Chetwode	Local Regulatory Rules	Compliance with local applicable law will be a mandatory minimum.
339.		CIBJO - The Laboratory-Grown Diamond Guidelines Diamond Terminology Guidelines CIBJO Diamond Blue Book	Noted.