



RJC Guidance on G7 Russian Diamond Import Restrictions

INTRODUCTION

The RJC provides this guidance for members to support them in the implementation of the G7 Russian diamond import restrictions ('import restrictions'), issued 1st March 2024 and updated September 1st 2024.

This guidance document provides an overview of the G7 import restrictions as well as the most relevant Code of Practices (COP) provisions that members should consider when reviewing their business operations in relation to the requirements of the import restrictions. Members should also consider whether other provisions may also apply to their particular operations. Further detail on implementing these provisions is available in the [COP Guidance document](#) and the [RJC Supply Chains Guidance Document](#).

This is a live document and will be subject to change, as the G7 release further information. Please ensure you are using the latest version; updated versions will be available here on the [RJC website](#).

ISSUE BACKGROUND

On December 6, 2023, G7 leaders issued a [statement](#) which included the following:

"We will introduce import restrictions on non-industrial diamonds, mined, processed, or produced in Russia, by January 1, 2024, followed by further phased restrictions on the import of Russian diamonds processed in third countries targeting March 1, 2024.

To further the effectiveness of these measures, those G7 members who are major importers of rough diamonds will establish a robust traceability-based verification and certification mechanism for rough diamonds within the G7 by September 1, 2024, and we will continue to consult with partners, including producing and manufacturing countries on its design and implementation.

We will continue consultations among G7 members and with other partners including producing countries as well as manufacturing countries for comprehensive controls for diamonds produced and processed in third countries on measures for traceability."

SUMMARY OF IMPORT RESTRICTIONS

Import restrictions on diamonds

The import restrictions will be implemented in two key phases:

- 1st March 2024: non-industrial rough and polished diamonds of 1.0 carat or greater from Russia that are exported or processed through a third country (non-Russian country).

- 1st September 2024: non-industrial rough and polished diamonds of 0.50 carat or greater.

This first phase of the import restrictions were applicable between the 1st March - 1st September 2024. On September 1st the restrictions were updated as part of a second phase, to expand the scope to non-industrial rough and polished diamonds of 0.5 carat or greater. Some G7 countries have also implemented rules to allow for the trade of diamonds within the scope of the restrictions, but purchased prior to the implementation of the import restrictions. Please see table 1 for further information on updates.

The requirements vary across G7 countries. For the most up to date requirements, as well as country specific information, please see the links in the appendix of this document. The appendix will be updated as new guidance is released.

Import restrictions on jewellery

For all G7 countries, a ban on jewellery only applies to direct imports from Russia, effective January 1st 2024. Jewellery that has been processed in a third country, incorporating diamonds originating in Russia or exported from Russia is not currently in scope. For the USA, self-certification, through a prescribed declaration for diamond jewellery, stating that it is not exported from Russia is required.

Note: Information regarding compliance with the prohibition on diamonds of Russian origin processed in third countries larger than or equal to 0.5 carats (0.1 grams or equivalent), taking effect from 1st September, will be communicated in due course.

Table 1: Updates to import restrictions (after 1st March 2024)

G7 Country	Expansion of scope to 0.5 carat or larger	Stock pre-existing the import restrictions	Other
Canada	Yes	Yes	
European Union (includes France, Germany and Italy)	Yes	Yes	Postponement of the sunrise period of the traceability scheme to 1 st March 2025. Postponement of the ban of jewellery incorporating Russian diamonds processed in third countries (to date unknown). Lab-grown diamonds with a weight equal to or above 0.5



			carats or 0.1 grams in scope as of 1 st September 2024.
Japan	TBC	TBC	
United Kingdom	Yes	Yes	
United States	Yes	Yes	

RJC MEMBER GUIDANCE

This guidance is applicable to RJC members importing and exporting non-industrial natural rough and polished diamonds into G7 countries (and including the EU). For some G7 countries this will also include jewellery containing diamonds.

Members’ systems, processes and documents developed as part of their implementation of the RJC COP provisions 1, 6, 7, 12, 14 and 29 where applicable, can support meeting the requirements of the import restrictions.

Members based in G7 countries (including the EU), importing and exporting diamonds to G7 countries (including the EU)

COP 1 Legal Compliance

COP 1 requires members to have systems that support compliance with applicable law. Members should ensure they are compliant with any import restrictions, updated, new or revised legislation in the jurisdictions in which they operate. Members in G7 countries (and including the EU) trading in natural diamonds into G7 countries (and including the EU) will be subject to the import restrictions.

Compliance with COP 1 Legal Compliance is subject to verification during the member’s next RJC audit under provision COP 1 Legal Compliance.

Further information for implementing COP 1 can be found on [pages 12-17 of the COP guidance document](#).

Members importing or exporting diamonds to G7 countries (including the EU)

COP 6 Human Rights

Compliance with COP 6 requires members to commit to and implement the United Nations Guiding Principles on Business and Human Rights. Members must conduct a risk assessment, and conduct (or review) their Human Rights due diligence on their supply chain, business partners, customers, and suppliers.



The members risk assessment required as part of COP 6 can be used to identify if its diamonds are of Russian origin or not. The risk assessment and its outcomes are subject to verification during the member's next RJC audit of COP 6.

Further information for implementing COP 6 can be found on [pages 37-49 of the COP guidance document](#).

COP 7 Due Diligence

Members are required to engage with their first-tier supply chain to obtain country of origin information on the materials that they are buying or trading. With the collected origin information, members must conduct due diligence risk assessments on the origin, their business partners, customers, and suppliers. Those risks are (at a minimum) to align with Annex II risks as specified by OECD, these are serious abuses associated with the extraction, transport or trade of minerals. Refer to risk mapping/guidance sources to verify the risks associated with the country of origin and its transportation routes. If the data collection raises any risks, red-flag risks or information that needs further investigation, members should suspend any further transactions until these risks have been investigated and responded to appropriately.

The due diligence processes required by COP 7 can also be used to identify if diamonds are of Russian origin or not. The due diligence process and its outcomes are subject to verification during the member's next RJC audit of COP 7.

Further information for implementing COP 7 for Diamonds can be found on [pages 50-72 of the COP guidance document](#).

COP 12 Know your Counterparty (KYC)

Members are required to hold information on all business partners, suppliers, customers or other significant stakeholders; this includes beneficial ownership. Members should consult sanctions lists for individuals, organisations, and governmental institutions throughout as much of the supply chain and business partner companies as possible. Members that import or export to G7 countries (and including the EU), must also review the G7 import restrictions when implementing COP 12. This can be incorporated into the risk assessments for Human Rights (COP 6) and supply chain due diligence (COP 7) as described above and be subject to verification during the member's next RJC audit of COP 12.

Further information for implementing COP 12 can be found on [pages 116-123 of the COP guidance document](#).

COP 14 Provenance Claims

If an RJC member makes a claim about the provenance of their diamonds whether single source or list of sources to support compliance with G7 government requirements banning Russian diamonds these are eligible as a Provenance Claim under COP 14. Members will need to ensure they have a system in place to support any such claim.

All provenance claims will be subject to verification during the member's next RJC audit of COP 14. If their next audit deadline is more than 12 months away, this shall be verified as part of a provenance claim bolt on audit as soon as reasonably practical.

For members where the G7 import restrictions are a legal requirement, claims that are covered by the legislation (e.g. stating the diamonds are not of Russian origin), are not eligible provenance claims under COP 14 as they are already audited under compliance with COP 1. However, claims stating the origin or source of the diamond (e.g. stating that diamonds are of X country origin), are eligible to be audited under COP 14 for all members.

For members who wish to have their claim visible on their certificate but have the requirement audited under COP 1 (as above), RJC will release a derogation to allow for this. The derogation is intended to support those RJC G7 members who are legally required to make such a claim already and further wish to include it on their RJC certificate, hence ensuring that RJC G7 members are not disadvantaged.

Further information for implementing COP 14 can be found on [pages 129-134 COP guidance document](#).

COP 29.1 & 29.2 Kimberley Process Certification Scheme

Members involved in the international trade of rough diamonds shall comply with the Kimberley Process Certification Scheme (KPCS) minimum requirements and recommendations as incorporated into the applicable legislation of countries where they operate. Conformance with the KPCS means not importing or exporting rough diamonds without government-validated certificates. That is, each shipment of rough diamonds crossing an international border from one Kimberley Process participant to another must be accompanied by a uniquely numbered and government validated KPCS certificate stating origin. Any diamonds from a region or country that a duly authorised government agency has indicated is a source of conflict diamonds must have been exported in compliance with the KPCS.

The KPCS certificate is subject to verification during the member's next RJC audit of COP 29.

Further information for implementing COP 29.1 and 29.2 can be found on [pages 250-252 COP guidance document](#).



APPENDIX OF RESOURCES

The appendix will be updated regularly as new guidance is released.

RJC resources

- [COP Guidance Document](#)
- [RJC Supply Chains Guidance Document](#)

Country specific import restrictions

Canada

- https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/russia-russie.aspx?lang=eng#a1
- https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/russia_regulations-reglement_russie63.aspx?lang=eng

European Union

- https://ec.europa.eu/commission/presscorner/detail/en/ip_24_3423
- https://ec.europa.eu/commission/presscorner/detail/en/QANDA_24_3425
- https://finance.ec.europa.eu/publications/consolidated-version_en
- https://finance.ec.europa.eu/document/download/abd6786d-526d-4e25-857b-91e2641e1c26_en?filename=fags-sanctions-russia-diamonds_en.pdf
- [Council Regulation \(EU\) No 833/2014 \(see article 3p and Annex XXXVIII A & XXXVIII B\)](#)

Japan

- https://www.mofa.go.jp/press/release/pressite_000001_00182.html
- chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.meti.go.jp/policy/external_economy/trade_control/01_seido/04_seisai/downloadCrimea/20240405press_russia.pdf

United Kingdom

- <https://www.gov.uk/government/publications/notice-to-importers-2953-russia-import-sanctions/guidance-on-third-country-processed-russian-diamonds-measures>



- <https://www.gov.uk/government/publications/general-trade-licence-for-sanctioned-russian-diamonds-processed-in-third-countries>
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United States

- <https://ofac.treasury.gov/faqs/1189>
- <https://ofac.treasury.gov/faqs/added/2024-02-23>
- <https://content.govdelivery.com/accounts/USDHSCBP/bulletins/38df6dc>

Disclaimer

The RJC is not responsible or liable for the interpretation or application of the above legislation or any information provided herein. This information is provided for general informational purposes only and should not be construed as legal advice. RJC members are strongly encouraged to consult with qualified legal professionals for advice specific to their circumstances and jurisdictions.

Version history

Version Number	Release date	Notes
v.1	1 March 2024	
v.1.1	20 March 2024	Clarification under COP 14. Update to country specific sanctions information and links, and other resources. Disclaimer.
v.1.2	29 March 2024	Update to links.
v. 2	02 September	Update to content and links in light of new import restrictions released,