



RESPONSIBLE  
JEWELLERY  
COUNCIL

# RJC CODE OF PRACTICES STANDARD – Supplementary Guidance

## Special Provision for G7 Import Restrictions

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# Provenance Claim Supplementary Guidance to the RJC COP Special Provision for G7 Import Restrictions

## 1. Purpose

This supplementary guidance explains how RJC members subject to the G7 diamond import restrictions that came into force in January, as subsequently updated in March and September 2024 (hereinafter called “RJC G7 members” and “G7 import restrictions”) can have factual claims relating to their compliance with these import restrictions (e.g. diamonds whether loose or included in jewellery are not sourced/do not originate from Russia) included on their RJC Code of Practices (COP) certificate.

## 2. Definitions

**Provenance claims** – claims about the way the RJC members source their materials or what kind of material members can provide to customers, covering the source, origin or practices used when sourcing. Any provenance claim must include both a promise and a system. Provenance claims can be made when a company:

- traces material back through the supply chain to its origin, e.g. through blockchain or invoices from the mine of origin.
- verifies the sources or practices related to the material, e.g. working with suppliers to source recycled material.
- sources material from certified suppliers, e.g. Fairmined gold; and
- scrutinises materials or sourcing e.g. going beyond the COP 7 requirements by conducting due diligence on environmental impacts related to mineral production.

**G7 Import restriction** – restrictions on non-industrial diamonds, mined, processed, or produced in Russia, from 1 January 2024, followed by further restrictions on the import of Russian diamonds of 1 carat or above processed in third countries from 1 March 2024 and of 0.5 carat or above processed in third countries from 1 September 2024. In some countries, restrictions may also apply to jewellery containing the above scope of diamonds.

**RJC G7 members** - any RJC members with a geographic presence where the G7 import restrictions are a legal requirement.

## 3. Applicability

The RJC recognises that its members may wish to include factual statements about their compliance with the G7 import restrictions as a certified provenance claim to gain recognition of their responsible practices and provide assurance to customers.

The aim of this Supplementary Guidance is to create the same opportunity related to claims for RJC G7 members as for those who are not based in the G7 area and thus mitigate any disadvantage.

The RJC already allows members to have a provenance claim indicating the country(s) where diamonds are sourced/originate from, which is then audited and certified under

COP 14 Provenance Claims. As a result, any such provenance claims are included on RJC member certificates. However, the Standards guidance specifies that claims about matters covered in the COP (which would include compliance with any legally required import restrictions) will be audited as part of the relevant COP provision and will not be certified as provenance claims.

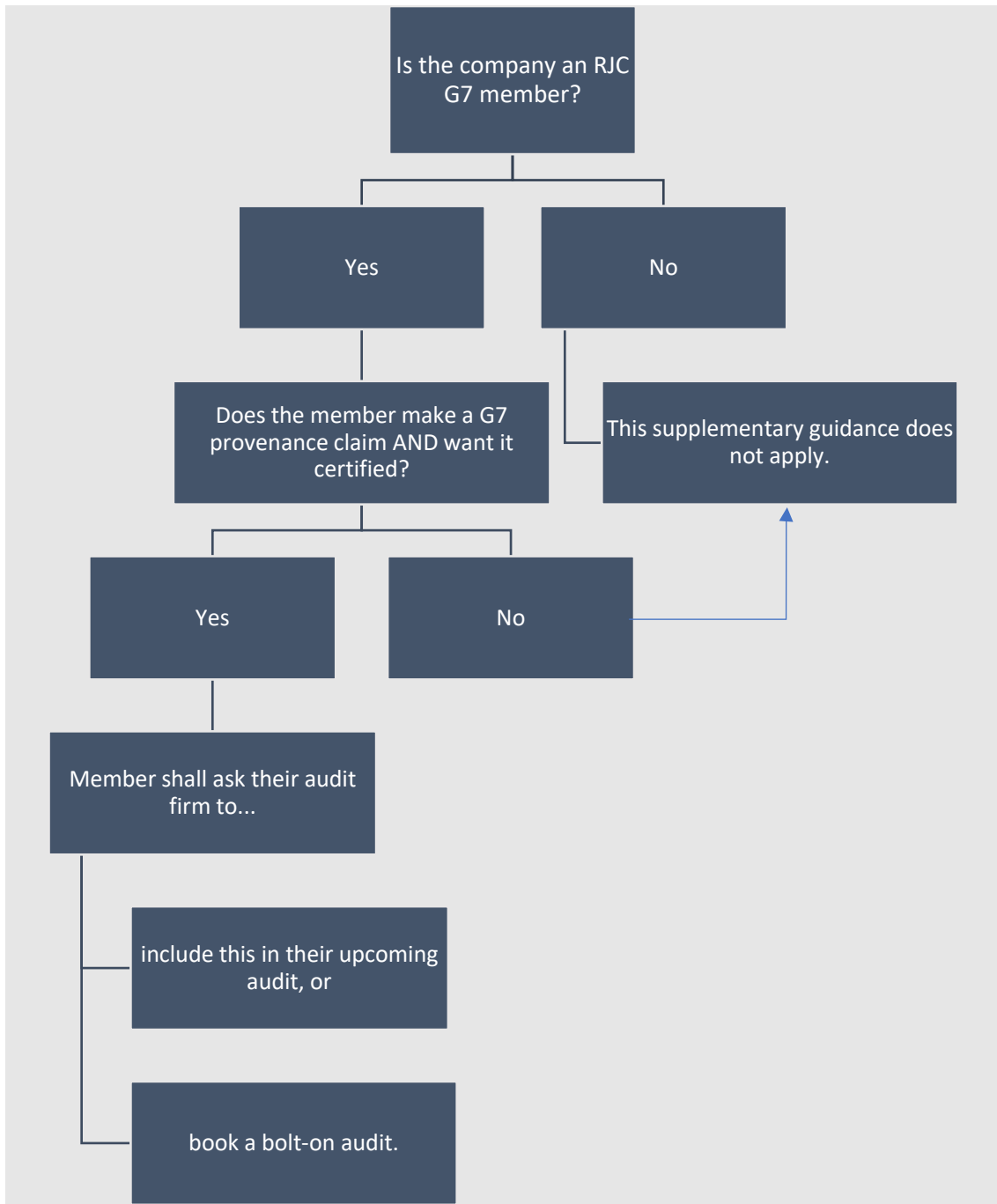
This supplementary guidance supersedes the above requirement strictly in relation to the G7 import restrictions and claims including a clear declaration (promise) to the effect that the diamonds are not sourced/do not originate from Russia. The particular wording may be adapted by RJC G7 members to satisfy specific regulations relevant to their geographic base or destination of the diamonds, or to client requirements, as long as any changes do not detract from or substantively alter this core meaning.

This supplementary guidance only applies where RJC G7 members:

- make claims on provenance in relation to the legal requirement under the G7 import restrictions, specifically claims including a clear statement (promise) to the effect that diamonds whether loose or included in jewellery are not sourced/do not originate from Russia, and
- choose to have such claims certified under COP 14 as a provenance claim, in addition to other required auditor verification, and have these recorded on their RJC certificate.

RJC G7 members can make claims, without having them specifically certified as a provenance claim under COP 14 and recorded on their RJC certificate, only as part of their compliance to the COP (in this case COP 1 specifically).

The below order of options shall be followed:



#### 4. Procedure

For RJC G7 Members	For RJC CABs
<p>RJC G7 Members may opt to have factual provenance claims relating to their compliance with the G7 import restrictions verified and certified based on this supplementary guidance, either as part of their regular certification/ recertification audit or as a separate bolt-on audit, either as a stand-alone or combined with a mid-term review.</p>	
<p>If this is undertaken at the time of a regular audit, the auditor will verify the evidence to support this claim under both COP 1 and COP 14 and complete the audit report clearly indicating the request for this claim to be included on the member's certificate under COP 14.</p>	<p>It is important to note that it is optional for RJC G7 members to request that this be included as a provenance claim on their certificate and may be requested by them either as part of their regular audit or as a bolt-on audit.</p> <p>If this statement is seen on an RJC G7 member's invoices or other materials during a regular audit, the evidence supporting this statement must be verified in the normal way under COP 1 and the RJC G7 member must be asked whether they wish to have this included on their certificate. If this is the case all requirements under COP14 shall also be verified and the audit report shall be completed clearly indicating the request for this claim to be included on the member's certificate.</p>
<p>If this is undertaken as a bolt-on audit, the claim will be audited under <u>both</u> COP 1 (Legal compliance to G7 import restrictions) and COP 14, and, on successful completion, the auditor will prepare an audit report to submit to the RJC to recommend the addition of this provenance claim to the member's RJC certificate.</p>	

#### 5. Disclaimer

There is no recognition process between the RJC and G7 countries (and their associated enforcement bodies) regarding an RJC certified provenance claim under COP 14. RJC G7 members using this supplementary guidance will still need to comply with the requirements of the G7 countries on import restrictions.