

RJC Laboratory Grown Material Standard Review

Comment Report on Laboratory Grown Material Standard Consultation

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

Comment, submissions and inquiries welcome: Please contact

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1. Purpose

The Responsible Jewellery Council (RJC) is writing a new Laboratory 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. The preliminary round of consultation closed in December 2021 and a summary of the comments and responses can be found [here](#). The next round of consultation ended in August 2024; the purpose of this document is to share the comments received during this round of consultation.

2. Comments

This consultation was carried out through an email campaign using the full RJC stakeholder list (over 5000 recipients) and posting of the draft standard to our website. Recipients include RJC members, audit firms, NGOs, industry press, trade associations, and government representatives. We also communicated the consultation on all of our social channels, as well as hosting a number of roundtable discussions with targeted stakeholder groups from across the various watch and jewellery industry supply chain points. Some of the key points raised by stakeholders during the consultation were:

- Product disclosure of laboratory-grown (lab-grown) stones and transparent/accurate communication is a top priority
- Importance of adherence to international guidelines and legislation
- Importance of making the requirements feasible for all sized companies

Table 1 below has each of the individual comments received from the Round 1 consultation. We greatly appreciate the time and insightful contributions from the submitters.

3. Next steps

These comments, in conjunction with internal research have been used to create a new RJC standard on lab-grown material. The RJC Standards Committee reviewed proposed changes resulting from key feedback, in addition to input from the lab-grown material taskforce, in order to inform the final version of the standard as well as the supporting guidance. Important to note: not all responses to the questions are from the web form. They include comments made in consultations and by other forms of communication e.g. email. They have been grouped under the relevant heading.

Table: Consultation Comments and RJC Responses

No.	Name	Comment	RJC response
Question 1: General Comments Provision 1.2 has been included to address Intellectual Property (IP) and licensing agreements relating to growing technologies. This is in addition to the underlying requirement for compliance with the law in this regard due to potential specific IP issues in relation to new technologies, growing methodologies or similar. Do you have any thoughts on the addition? (1 of 2)			
1.	Rahul K. Desai, International Institute of Gemology	It should be block chained - if all not possible than certain an sizes like +5 Carats	Thank you for your input. As the RJC is not intending to develop a Chain of Custody Standard for lab-grown materials at this time, this is out of scope.
2.	Symeon Oshea Davies, Mount Cyllene Organisation	Ensure that the provision covers all aspects of IP, including patents, trademarks, copyrights, and trade secrets. This is crucial for protecting proprietary technologies, designs, and methodologies used in the production of laboratory-grown materials.	Thank you for your comment. This has been taken into account and incorporated into the Standard and Guidance Document.
3.	Eduard Stefansecu, C.HAFNER GmbH + Co. KG	I fully agree with the additional provision.	Thank you for your comment.
4.	Laksanawadee Daothewan, DCC Enterprise	No	Thank you for your comment.
5.	Anonymous	This is a good thought.	Thank you for your comment.
6.	Anonymous	Yes	Thank you for your comment.
7.	Eyal Atzmon, El-Ran	Agree	Thank you for your comment.
8.	Philip N. Grima, CKC Jewellery Co., Ltd.	Positive	Thank you for your comment.
9.	Michal Koselja, ELI- ERIC	Yes	Thank you for your comment.
10.	Anonymous	Very good	Thank you for your comment.
11.	Mohammed D Aljohani, Freelancer	No, I did not see the news	Thank you for your comment.
12.	Ezio Zacchei, Bureau Veritas Italia SPA	I believe the requirement is complete	Thank you for your comment.
13.	Lo Quoc Thanh, D.I Limited	For us, it is OK as mentioned	Thank you for your comment.
14.		It is essential to make clear the obligation to comply with the legislation of the country of destination of the goods.	Thank you for this input. This clarity is included in the Guidance Document.
Question 1: Is there a need for any specific IP topics to be added to this point? (2 of 2)			

15.	Symeon Oshea Davies, Mount Cyllene Organisation	Technology Sharing & Collaboration, Compliance with International IP Laws, Open Innovation Models	Thank you for your comment. We have incorporated some guidance on this topic in the Guidance Document.
16.	Eduard Stefansecu, C.HAFNER GmbH + Co. KG	I don't see the need for additional specific IP topics.	Thank you for your comment.
17.	Laksanawadee Daothewan, DCC Enterprise	No	Thank you for your comment.
18.	Natalia, Claus Union SL	NO	Thank you for your comment.
19.	Anonymous	None	Thank you for your comment.
20.	Philip N. Grima, CKC Jewellery Co., Ltd.	None	Thank you for your comment.
21.	Anonymous	No	Thank you for your comment.
22.	Michal Koselja, ELI- ERIC	No	Thank you for your comment.
23.	Anonymous	No	Thank you for your comment.
24.	Anonymous	No	Thank you for your comment.
25.	Xavier Bouteyre, Louxor Limited	No	Thank you for your comment.
26.	Mohammed D Aljohani, Freelancer	I don't understand what is specifically meant in the question? But there may be a patent application filed for intellectual property on this subject	Thank you for your comment. The provision relates to all patent applications as well as to companies' own specific IP and confidentiality and we have incorporated guidance on this.
27.	Anonymous	No	Thank you for your comment.
28.	Kurt Vercammen, Spitsdiam BV	No	Thank you for your comment.
29.	Anonymous	Not really	Thank you for your comment.
30.	Ezio Zacchei, Bureau Veritas Italia SPA	No.	Thank you for your comment.
31.	Anonymous	No	Thank you for your comment.
32.	Lo Quoc Thanh, D.I Limited	Not yet	Thank you for your comment.
33.	Anonymous	No	Thank you for your comment.

Question 3: Laboratory Grown Material Standard (LGMS) provision 3 requires reporting on business practices relevant to the LGMS, as well as on legal proceedings, fines, penalties and non-monetary sanctions.

Do you think the level of reporting is sufficient? (1 of 2)

34.	Rahul K. Desai, International Institute of Gemology	Yes	Thank you for your comment.
35.	Symeon Oshea Davies, Mount Cyllene Organisation	Provide detailed reports on labor practices, including worker rights, wages, working conditions, and any incidents of labor violations. Report on community engagement activities, including support for local communities, educational programs, and social impact initiatives.	Thank you for your comment. Indeed, the topics you have raised are required in public reporting as these all form part of the Laboratory Grown Material Standard.
36.	Eduard Stefansecu, C.HAFNER GmbH + Co. KG	I believe the level of reporting is sufficient to the present state. However, there should be a definition or instruction/s on how to define "affected people or groups". The most appropriate way to do this might be a materiality assessment.	Thank you for your comment. We will review the guidance in both the Code of Practices and the Laboratory Grown Material Standard to see whether additional information and potentially training is required on this matter.
37.	Laksanawadee Daothewan, DCC Enterprise	Yes	Thank you for your comment.
38.	Anonymous	This is ethical business practice as established by the principles of CSR, and the question of whether or not it is sufficient is irrelevant; it is quite simply a practice that should be adopted.	Thank you for your comment.
39.	Natalia, Claus Union SL	YES	Thank you for your comment.
40.	Anonymous	Yes, but needs more time.	Thank you for your comment.
41.	Eyal Atzmon, El-Ran	No, and Who will verify that it's done correctly? Every 3 years is not enough	Thank you for your comment. The reporting will be verified by the 3rd party auditors. In addition to the three-year certification cycle there is now a requirement for a mandatory mid-term surveillance so this will be done at each visit.
42.	Philip N. Grima, CKC Jewellery Co., Ltd.	Yes	Thank you for your comment.
43.	Anonymous	Yes	Thank you for your comment.
44.	Michal Koselja, ELI- ERIC	yes	Thank you for your comment.
45.	Anonymous	yes	Thank you for your comment.
46.	Anonymous	I suppose yes	Thank you for your comment.

47.	Mohammed D Aljohani, Freelancer	Maybe that's enough. It is preferable that the Consumer Protection Department send awareness and warning messages	Thank you for your comment. The reporting referenced under this provision relates to publicly available sustainability reporting. The type of reporting you are referencing would be covered under the relevant provisions such as Laboratory Grown Material Standard (LGMS) provision 27.2 on product disclosure or LGMS 12 on Claims as well as being covered by LGMS 1 Legal Compliance.
48.	Anonymous	Yes	Thank you for your comment.
49.	Kurt Vercammen, Spitsdiam BV	it will get more strict	Thank you for your comment.
50.	Anonymous	I believe the level of reporting is adequate	Thank you for your comment
51.	Ezio Zacchei, Bureau Veritas Italia SPA	Yes	Thank you for your comment.
52.	Anonymous	Yes	Thank you for your comment.
53.	Lo Quoc Thanh, D.I Limited	Yes, it is OK and enough for the moment.	Thank you for your comment.
54.	Anonymous	Yes its enough	Thank you for your comment.
55.		Recommendation for the mandatory engraving of synthetic diamonds to identify their manufacturing process (HPHT or CDV), or any other means of distinguishing a synthetic diamond from a natural diamond (e.g. invoice color).	Thank you for this suggestion. The RJC Standard has to maintain its position of neutrality between natural and laboratory-grown gemstones and as such would not be in a position to require specific mechanisms to create such distinctions. However, the need for clear segregation, as well as differentiation and clarity in communications is covered in Provision27 on product disclosure and will be verified during any 3rd party audits.
Question 4: Do you think further reporting should be required for growing/producing facilities? If yes, do you have a suggested framework or standard for reporting that would be appropriate for this supply chain point? (2 of 2)			
56.	Rahul K. Desai, International Institute of Gemology	Yes - Making them members of certain blockchain and diamond bourses membership	Thank you for your suggestion. Provision 3 relates to public reporting on systems and outcomes in relation to compliance with the Laboratory Grown Material Standard. Enforcing membership of particular organisations or trading platforms would be out of scope and would create an interference in our members' business practices.
57.	Xavier Bouteyre, Louxor Limited	No	Thank you for your comment.

58.	Symeon Oshea Davies, Mount Cyllene Organisation	Yes, further reporting should be required for growing/producing facilities to ensure comprehensive transparency, ethical practices, and environmental sustainability throughout the supply chain. Implementing a detailed reporting framework at this critical supply chain point can help identify and address issues early, ensure compliance with standards, and foster trust among stakeholders. Framework: Operational Transparency -> Environmental Impact -> Labor Practices -> Human Rights -> Product Quality/Safety -> Supply Chain Management -> Social Responsibility -> Governance -> Innovation	Thank you for your comment and suggestion. Much of this is already covered in the requirements for reporting in relation to Laboratory Grown Material Standard practices. However, we are constantly reviewing our toolkits and will take this into account when we revise our reporting guidelines.
59.	Laksanawadee Daothewan, DCC Enterprise	Should be reported and there are checks in the supply chain	Thank you for your comment.
60.	Natalia, Claus Union SL	No	Thank you for your comment.
61.	Eyal Atzmon, El-Ran	For sure it's necessary, maybe a yearly reporting with 'surprise' inspection	Thank you for your comment. The 3rd party auditors will be reviewing the reporting at their regular audit visits and will verify the mandatory external verification that has been undertaken. There is also now a requirement for a mid-term surveillance audit.
62.	Anonymous	No	Thank you for your comment.
63.	Michal Koselja, ELI- ERIC	No	Thank you for your comment.
64.	Anonymous	Yes need to be clear for customer	Thank you for your comment.
65.	Anonymous	not yet	Thank you for your comment.
66.	Xavier Bouteyre, Louxor Limited	No	Thank you for your comment.
67.	Mohammed D Aljohani, Freelancer	We hope that the competent authorities will oblige the owners of this product to place a prominent sign indicating that the substance is an industrial laboratory product	Thank you for your comment. The requirements of the local competent authorities are out of scope for the RJC but compliance with legal requirements will be verified during the regular 3rd party audits.
68.	Anonymous	No	Thank you for your comment.
69.	Kurt Vercammen, Spitsdiam BV	No	Thank you for your comment.
70.	Anonymous	Maybe alignment with OECD guidance/s would be appropriate.	Thank you for your comment. All RJC Standards are aligned with the relevant OECD guidance and include key elements of other internationally recognised best practices.
71.	Ezio Zacchei, Bureau Veritas Italia SPA	No	Thank you for your comment.
72.	Anonymous	No	Thank you for your comment.
73.	Lo Quoc Thanh, D.I Limited	For us, it is OK and enough for the moment.	Thank you for your comment.

74.	Anonymous	No	Thank you for your comment.
Question 5: A provision has been included requiring members to conduct due diligence on laboratory grown materials as well as materials going into the growing and creation of the laboratory grown materials, in line with the OECD Due Diligence Guidance for Responsible Business Conduct and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Do you feel this is a sufficient level of due diligence on the Laboratory Grown Material supply chain? (1 of 2)			
75.	Rahul K. Desai, International Institute of Gemology	Yes	Thank you for your comment.
76.	Alessandra Gargiulo, Bruna the Label	Sufficient yes, but also unnecessary	Thank you for your comment.
77.	Symeon Oshea Davies, Mount Cyllene Organisation	Committing to transparent public reporting on due diligence activities and findings can build trust with consumers and other stakeholders. Regularly published reports detailing risk assessments, mitigation efforts, and outcomes demonstrate a commitment to accountability and ethical practices.	Thank you for your comment. Members are required to report annually on their due diligence efforts in line with the OECD guidance. We encourage our members to provide as much information and as transparently as possible in their reporting.
78.	Eduard Stefansecu, C.HAFNER GmbH + Co. KG	I believe this is a sufficient level of due diligence. However, members may take additional frameworks of due diligence into consideration, reflecting even more their particular business context.	Thank you for your comment. Members are free to use additional due diligence frameworks as they wish, as long as they comply with the requirements of the RJC standards. We have signposted additional best practices in the Guidance Document and will continue to build on this in the future.
79.	Laksanawadee Daothewan, DCC Enterprise	Medium	Thank you for your comment.
80.	Anonymous	Again, it is a simply CSR good practice, we should comply with it without questions.	Thank you for your comment.
81.	Natalia, Claus Union SL	No	Thank you for your comment.
82.	Anonymous	It depends on where you're located	Thank you for your comment. It would be useful to have more information on what additional requirements you would like to see included so we can take these into consideration.
83.	Eyal Atzmon, El-Ran	A good due diligence is very important. I noticed that even in natural diamonds it is not done good enough. This or a very important point that deserves more attention, education, and talk about.	Thank you for your comment. The RJC is currently reviewing the Due Diligence Toolkit and will be undertaking further webinars and training on this on completion.
84.	Philip N. Grima, CKC Jewellery Co., Ltd.	Yes	Thank you for your comment.
85.	Anonymous	Yes	Thank you for your comment.
86.	Michal Koselja, ELI- ERIC	Sure	Thank you for your comment.

87.	Anonymous	Yes	Thank you for your comment.
88.	Anonymous	yes	Thank you for your comment.
89.	Xavier Bouteyre, Louxor Limited	Yes	Thank you for your comment.
90.	Mohammed D Aljohani, Freelancer	Maybe	Thank you for your comment. It would be useful to have more information on what additional requirements you would like to see included so we can take these into consideration.
91.	Anonymous	Yes	Thank you for your comment.
92.	Kurt Vercammen, Spitsdiam BV	Yes	Thank you for your comment.
93.	Anonymous	I believe this is a sufficient level of due diligence give the global relevance of these guidances.	Thank you for your comment.
94.	Ezio Zacchei, Bureau Veritas Italia SPA	Yes	Thank you for your comment.
95.	Anonymous	Yes	Thank you for your comment.
96.	Lo Quoc Thanh, D.I Limited	Yes, it is OK and enough for the moment.	Thank you for your comment.
97.	Anonymous	Yes	Thank you for your comment.
98.		Concern of the origin of synthetic diamonds, which is essentially Russian and Chinese.	Thank you for your comment. Further guidance and a toolkit to support traceability is being developed and we will review how to extend this to laboratory grown materials.

Question 6: Do you have any further comments on this proposed provision? (2 of 2)

99.	Rahul K. Desai, International Institute of Gemology	no	Thank you for your comment.
100.	Alessandra Gargiulo, Bruna the Label	I do not believe the Annex II risks of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas are relevant for the LGMs industry. Due diligence should be implemented, but a different set of prioritized risks should be considered. The impacts of a diamond lab are much different than the impacts of a mine, as well as the geography / supply chain.	Thank you for your comment. The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Area has been adapted to fit the laboratory grown material supply chain and the risks along this supply chain. For laboratory grown material Growers, the standard requires implementation of due diligence in line with the OECD Due Diligence Guidance for Responsible Business Conduct for materials used in the growing process. We believe that by applying the two OECD guidances in this way it covers the necessary due diligence requirements and addresses the risks as appropriate to the laboratory

			grown material supply chain. These requirements are supplemented further by the information provided in the Guidance Document.
101.	Symeon Oshea Davies, Mount Cyllene Organisation	The supply chain landscape is constantly evolving, with new risks emerging regularly. It is essential to maintain adaptive risk management strategies that can respond to these changes swiftly. This includes updating risk assessment methodologies, staying informed about industry developments, and being proactive in addressing new challenges.	Thank you for your comment. The RJC encourages members to keep these topics under constant review as part of their due diligence requirements. We are also working on updating or creating new toolkits and training where necessary to support this.
102.	Eyal Atzmon, El-Ran	To find a way to educate both natural diamonds and LGD to do, use, apply a correct due diligence	Thank you for your comment. In addition to the due diligence requirements in the standard and the supporting guidance, RJC provide training, webinars and have Due Diligence Toolkits available for members on this on this.
103.	Mohammed D Aljohani, Freelancer	In fact, consumers have become more drawn to most counterfeit goods due to the deteriorating financial situation and weak supervision	Thank you for your comment. Counterfeit goods are out of scope for the RJC and our members are not permitted to trade in such materials as this would be in contravention of the requirement in Laboratory Grown Material Standard (LGMS) provision 1 Legal Compliance.
Question 7: Provisions have been added requiring members to calculate, verify and report on scope 1 and 2 greenhouse gas emissions where applicable. Laboratory grown material growers/producers will be required to additionally calculate scope 3 emissions, implement GRI 305 standard on emissions reporting, as well as set a reduction plan. Guidance will be provided to support members in implementing this provision. Do you have any thoughts on this requirement?			
104.	Alessandra Gargiulo, Bruna the Label	I believe for LGM growers/producers, scope 1 and 2 will be most relevant, not scope 3. For this reason, I am not sure it is appropriate to request that LGM growers/producers additionally calculate scope 3 emissions, if this is not asked to the whole industry.	The requirement to calculate Scope 3 emissions applies to supply chain points as having significant emissions. As this sector of the industry is known to have high requirements for energy and would have associated high emissions and it is for this reason that laboratory grown material growers/producers are required to make scope 3 emissions calculations.
105.	Eduard Stefansecu, C.HAFNER GmbH + Co. KG	Based on own experience and work on calculating scope 1, 2 & 3 emissions, it might be a heavy burden for some of the members, given their size and capacities. The same applies to the COP. However, taking into consideration RJC's strategy to strive for alignment with UN SDGs, this makes sense. But, support shall be provided.	Thank you for your comment. The provision is designed to apply to members based on their size and circumstances, which means for smaller companies they can use resources more readily available to them. The provision requirements also very based on the level of significance of impact of

			the members emissions in order to make it more equitable.
106.	Laksanawadee Daothewan, DCC Enterprise	Yes	Thank you for your comment.
107.	Anonymous	This is perfect, it is time for all companies to take a step forward on that subject, we should all provide a carbon footprint, and if small companies aren't trained for that, help should be proposed by the RJC itself.	Thank you for your comment. The RJC looks to support its members, especially SMEs, in the implementation of provisions such as this where possible through webinars, toolkits, and guidance.
108.	Eyal Atzmon, El-Ran	The impact of LGD is very unclear. It is important to know much more and much deeper about the empathy of LGD emission pollution (use of water, electricity, etc)	Thank you for your comment. While the impact is not yet fully understood, the growing/production methodologies are known to have high use of energy and associated emissions, and it is for this reason that laboratory grown material growers/producers are required to make these calculations. Once more public reporting is available it will be possible to tailor future amendments to the standard to any risks identified.
109.	Michal Koselja, ELI- ERIC	useless, increase costs of product	Thank you for your comment. The RJC is committed to promoting responsible practices and ethical standards in the watch and jewellery industry. Trust, transparency, and sustainability are key to this, benefiting consumers, communities, and the environment. As such, public reporting and providing verifiable data on emissions is essential.
110.	Anonymous	I think it is necessary to start with GRI and GHG. For small businesses it is a major challenge in terms of both personnel and finances.	Thank you for your comment. The provision is designed to apply to members based on their size and circumstances, which means for smaller companies they can use resources more readily available to them. The provision requirements also very based on the level of significance of impact of the members emissions in order to make it more equitable.
111.	Anonymous	It might go too far, given the various sizes and resources of the members. this should be taken into account. It wouldn't help the sector and the RJC if burdens were too high and expectations couldn't be reached.	Thank you for your comment. The provision is designed to apply to members based on their size and circumstances, which means for smaller companies they can use resources more readily available to them. The provision requirements also very based on the level of significance of impact of

			the members emissions in order to make it more equitable.
112.	Anonymous	For this aspect it is suggested to apply ISO 14064 created for the quantification and communication of the carbon footprint of a product (CFP: Carbon FootPrint.	Thank you for your comment. This important standard has been added to the Laboratory Grown Material Standard Guidance Document as a reference.
113.	Anonymous	I believe this requirement is practically only very expensive and costly to fulfill. Small and medium-sized enterprises will not be able to do this	Thank you for your comment. The provision is designed to apply to members based on their size and circumstances, which means for smaller companies they can use resources more readily available to them. The provision requirements also very based on the level of significance of impact of the members emissions in order to make it more equitable.
114.	Lo Quoc Thanh, D.I Limited	For us, we think just cover/report on scope 1 and 2 at the moment is OK for the business.	Thank you for your comment. The provision is designed to apply to members based on their size and circumstances, which means for smaller companies they can use resources more readily available to them. Only scope 1 and 2 are applicable to all members, scope 3 applies only to growing companies. The provision requirements also very based on the level of significance of impact of the members emissions in order to make it more equitable.
Question 8: Provisions have been included under product disclosure to be clear on the language that can be used when describing laboratory grown materials. This is to ensure accuracy and transparency when talking about laboratory grown materials and to ensure customers can clearly understand what product they are buying. Do you have any thoughts on this requirement?			
115.	Eduard Stefansecu, C.HAFNER GmbH + Co. KG	Common understanding should be developed right from the start (see CoC 'recycled gold' discussions), hence I agree with this provision.	Thank you for your comment. This is, indeed, a very important point. We have based the disclosure requirements on industry standard requirements and will continue to maintain this position.
116.	Chloe, Hirlal Gems	Make them tell the truth and call it synthetic material. Ban the term lab grown. Nothing to do with labs any more.	Thank you for your comment. The term lab-grown is widely acknowledged in the industry and is used in many territories. In territories where there is a legal requirement for the term synthetic or otherwise to be used, RJC Members will have to comply with this.

117.	Alessandra Gargiulo, Bruna the Label	I agree that provisions should be included to ensure that language is clear. However, I am not sure that the current provisions achieve this intended result. For example: "d. The use of the following terms to describe LGD or LGCG is only permitted when qualified by a term as defined in 28.2a: "real", "genuine", "precious", "authentic" and "natural". This sounds like the term "natural" can be used for describing LGMs. I believe these provisions need to be reformulated to be made clearer.	Thank you for your comment. This has been taken into account in the final version of the Laboratory Grown Material Standard.
118.	Laksanawadee Daothewan, DCC Enterprise	Yes	Thank you for your comment.
119.	Anonymous	It makes sense.	Thank you for your comment.
120.	Anonymous	It's better to have the same standards and clear of informations of all.	Thank you for your comment.
121.	Eyal Atzmon, El-Ran	Agree	Thank you for your comment.
122.	Anonymous	Provisions are sufficient.	Thank you for your comment.
123.	Michal Koselja, ELI- ERIC	it is not necessary, business partner (customer) should have to know the appropriate trade issue	Thank you for your comment. The RJC requires full transparency to ensure that buyers whether B2B or Consumers are not being misled.
124.	Anonymous	Yes	Thank you for your comment.
125.	Anonymous	We highly appreciate a clear and accurate definition. We use the CIBJO terminology. It would be very helpful that all relevant organisations have the same understanding and can agree on a terminology.	Thank you for your comment. This is, indeed, a very important point. We have based the disclosure requirements on industry standard requirements and will continue to maintain this position.
126.	Mohammed D Aljohani, Freelancer	As I previously mentioned, the obligation to place a prominent sign indicating that the product is industrial, along with mentioning the manufacturing materials	Thank you for your comment. The Standard requires full transparency and clarity in descriptions to ensure that buyers are not being misled and understand the product they are buying. Further information has been included in the Guidance document and members are required to assess the most appropriate way to make this information available.
127.	Anonymous	I agree.	Thank you for your comment.
128.	Ezio Zacchei, Bureau Veritas Italia SPA	I agree with what is defined in the requirement	Thank you for your comment.
129.	Anonymous	sounds sensible, but it's also hard to do	Thank you for your comment.
130.	Lo Quoc Thanh, D.I Limited	For us, it is OK.	Thank you for your comment.

131.		request for engraving and the requirement for distinctive elements on commercial documents.	Thank you for this suggestion. The RJC Standard has to maintain its position of neutrality between natural and laboratory-grown gemstones and as such would not be in a position to require specific mechanisms to create such distinctions. However, the need for clear segregation, as well as differentiation and clarity in communications is covered in Provision27 on product disclosure and will be verified during any 3rd party audits.
Question 9: Feedback from the initial Laboratory Grown Material Standard consultation indicated that permanent and non-permanent enhancements to lab-grown stones such as chemical treatments or heating (or any other enhancement, typically known as treatments for natural stones) are considered a part of the manufacturing of the laboratory grown material product and are therefore not considered 'treatments'; as such it has been proposed that disclosure of such enhancements would not be needed. However, RJC are still proposing to include disclosure of non-permanent enhancements to the stones for transparency and to ensure customers know whether the stone they purchase may change over time as a result. Do you think this is a sufficient level of disclosure? (1 of 3)			
132.	Rahul K. Desai, International Institute of Gemology	Nope	Thank you for your comment. It would be useful to have further information or suggestions to allow us to review and see what else could be incorporated.
133.	Chloe, Hirlal Gems	Any treatment should be disclosed	Thank you for your comment. The RJC has decided to take a balanced approach and ask for treatments applied after the initial growth which may not be permanent to be disclosed at this time. However, we will be reviewing this at the next cycle to understand whether this is providing sufficient clarity to consumers and may add further requirements at that time.

134.	Symeon Oshea Davies, Mount Cyllene Organisation	The proposal to exclude permanent and non-permanent enhancements to lab-grown stones from being classified as 'treatments' while still requiring the disclosure of non-permanent enhancements is a balanced approach, yet it warrants careful consideration. Permanent enhancements, such as chemical treatments or heating, that are integral to the manufacturing process and do not alter over time, may reasonably be excluded from mandatory disclosure. However, transparency regarding non-permanent enhancements is essential to maintain customer trust and informed decision-making. By disclosing non-permanent enhancements, the Responsible Jewellery Council (RJC) ensures that customers are fully aware of any changes that could affect the appearance or quality of their stones over time. This level of disclosure is crucial for upholding transparency and maintaining the integrity of lab-grown stones in the marketplace. It allows consumers to make well-informed choices, understanding the longevity and stability of their purchase. Therefore, while the current proposal is a step in the right direction, it is vital to consistently review and update disclosure practices to align with evolving industry standards and consumer expectations, ensuring comprehensive transparency and trust in lab-grown materials.	Thank you for your comment. The RJC has decided to take a balanced approach and ask for treatments applied after the initial growth which may not be permanent to be disclosed at this time. However, we will be reviewing this at the next cycle to understand whether this is providing sufficient clarity to consumers and may add further requirements at that time.
135.	Anonymous	The CSR experts always say that transparency is a must have, especially in business affairs. It sounds logical as well to our ears.	Thank you for your comment.
136.	Natalia, Claus Union SL	Yes	Thank you for your comment.
137.	Anonymous	Very important (as a guaranteed of its products)	Thank you for your comment.
138.	Anonymous	Very important (as a guaranteed of its products)	Thank you for your comment.
139.	Eyal Atzmon, El-Ran	Yes and to ensure that the treatment is NOT radioactive!	Thank you for your comment. The point about any potential radioactive treatments (parallel to the irradiation of natural diamonds) is important and would be covered under the Product Disclosure requirement in Laboratory Grown Material Standard provision 27.2g
140.	Philip N. Grima, CKC Jewellery Co., Ltd.	non-permanent treatment should definitely be declared	Thank you for your comment.
141.	Anonymous	yes	Thank you for your comment.
142.	Michal Koselja, ELI- ERIC	sure, important issue	Thank you for your comment.
143.	Anonymous	Yes	Thank you for your comment.

144.	Anonymous	Yes	Thank you for your comment.
145.	Xavier Bouteyre, Louxor Limited	Yes	Thank you for your comment.
146.	Mohammed D Aljohani, Freelancer	Yes, the explanation is sufficient	Thank you for your comment.
147.	Anonymous	Yes	Thank you for your comment.
148.	Kurt Vercammen, Spitsdiam BV	Yes	Thank you for your comment.
149.	Anonymous	I agree	Thank you for your comment.
150.	Ezio Zacchei, Bureau Veritas Italia SPA	Yes	Thank you for your comment.
151.	Anonymous	Yes	Thank you for your comment.
152.	Lo Quoc Thanh, D.I Limited	Yes, this is sufficient level.	Thank you for your comment.
153.	Anonymous	yes I do	Thank you for your comment.
Question 10: Do you think the term enhancement is an appropriate term? (2 of 3)			
154.	Rahul K. Desai, International Institute of Gemology	Treatment should be apt	Thank you for your comment.
155.	Chloe, Hirlal Gems	Treatment is more realistic	Thank you for your comment.
156.	Symeon Oshea Davies, Mount Cyllene Organisation	The term "enhancement" in the context of lab-grown stones can be somewhat ambiguous and potentially misleading to consumers. While it accurately describes processes that improve the appearance or durability of a stone, it doesn't necessarily convey whether these changes are permanent or non-permanent, or the nature of these alterations.	Thank you for your comment. The use of this term provoked a wide range of opinions. The RJC wanted to clearly differentiate between treatments to natural stones and subsequent processes applied to lab-grown gemstones and thus needed a separate definition/term for this. We will continue to monitor how this is perceived and seek to strengthen the nomenclature in this area.
157.	Eduard Stefansecu, C.HAFNER GmbH + Co. KG	Yes	Thank you for your comment.
158.	Anonymous	Perhaps ? Only experts can stamp on that.	Thank you for your comment.
159.	Natalia, Claus Union SL	Yes	Thank you for your comment.
160.	Eyal Atzmon, El-Ran	Yes	Thank you for your comment.
161.	Philip N. Grima, CKC Jewellery Co., Ltd.	Yes	Thank you for your comment.
162.	Anonymous	Yes	Thank you for your comment.
163.	Michal Koselja, ELI- ERIC	yes, with no doubt	Thank you for your comment.
164.	Anonymous	Yes	Thank you for your comment.

165.	Anonymous	Yes	Thank you for your comment.
166.	Xavier Bouteyre, Louxor Limited	Yes	Thank you for your comment.
167.	Mohammed D Aljohani, Freelancer	Maybe	Thank you for your comment.
168.	Kurt Vercammen, Spitsdiam BV	Yes	Thank you for your comment.
169.	Anonymous	I believe its an appropriate term.	Thank you for your comment.
170.	Anonymous	In the management system the term used is improvement	Thank you for your comment. As "improvement" could also be subjective the RJC felt that this would not cover the processes appropriately.
171.	Anonymous	for me would be 'treatment' more appropriate, not all these treatments are actually enhancements	Thank you for your comment. The use of this term provoked a wide range of opinions. The RJC wanted to clearly differentiate between treatments to natural stones and subsequent processes applied to lab-grown gemstones and thus needed a separate definition for this. We will continue to monitor how this is perceived and seek to strengthen the nomenclature in this area.
172.	Lo Quoc Thanh, D.I Limited	yes, it does	Thank you for your comment.
173.	Anonymous	yes I like the term	Thank you for your comment.
174.		The participants wished to delete the term “enhancements” and refer only to “treatments”. Regarding the notion of “permanence”, it is worth mentioning that treatments can be unstable.	Thank you for your comment. The term enhancement has been used to differentiate from the treatments on natural gemstones and to reflect the fact that many of these enhancements form part of the initial growing process, rather than being undertaken after the event. The fact that some of these may not be permanent has been considered and the nature of any impermanent are part of the requirement for disclosure.
Question 11: Do you have any further comments on this change? (3 of 3)			
175.	Anonymous	Importantly for the price and quality comparing to nonLGM	Thank you for your comment. The RJC Standard requires clarity in relation to any grading activities that include valuations but does not comment on pricing otherwise. However, we have required full transparency to end consumers so that they can make informed decisions.
176.	Anonymous	Yes	Thank you for your comment.

Question 12: Is there a need for any further requirements to apply to growers/producers or other laboratory grown material supply chain points to address any particular points of difference or risk?

177.	Symeon Oshea Davies, Mount Cyllene Organisation	Yes, there is a need for further requirements to be applied to growers, producers, and other points within the LGM supply chain to address specific points of difference and risks. Given the unique nature of lab-grown materials (LGMs) compared to natural stones, additional considerations should be made to ensure the integrity, transparency, and ethical standards of the entire supply chain. One key area is the verification and certification of the technological processes used in growing LGMs. Establishing stringent standards for the methods and materials used in production can mitigate risks related to inconsistent quality, environmental impact, and potential health hazards for workers. Additionally, implementing robust traceability measures, such as blockchain technology, can enhance transparency by allowing every stage of the supply chain to be tracked and verified. This can help prevent issues such as the misrepresentation of LGM origin or the unethical sourcing of raw materials. Furthermore, requiring periodic third-party audits and certifications can ensure ongoing compliance with established standards and identify areas for continuous improvement. Addressing these specific risks and differences through additional requirements will not only enhance consumer trust but also uphold the reputation of the LGM industry as a whole, fostering responsible practices.	Thank you for your comment. The Laboratory Grown Material Standard has included a number of requirements to address the points about responsible sourcing, due diligence and transparency as well as to require mandatory reporting on all aspects, including environmental impacts. Compliance with the standard is verified periodically for RJC Members with a three--year recertification and a strengthened requirement for mid-term surveillance visits. The RJC does not certify technological process or endorse or require specific traceability programmes, such as blockchain, but would welcome such initiatives undertaken by appropriate independent organisations and would then benchmark these to include them into its harmonised standards where appropriate. If you have recommendations for initiatives to be included at this time, we would be happy to add them to our benchmarking programme.
178.	Laksanawadee Daothewan, DCC Enterprise	Yes	Thank you for your comment.
179.	Anonymous	We don't think about anything particular.	Thank you for your comment.
180.	Natalia, Claus Union SL	No	Thank you for your comment.
181.	Eyal Atzmon, El-Ran	ESG	Thank you for your comment.
182.	Anonymous	No	Thank you for your comment.
183.	Michal Koselja, ELI- ERIC	No	Thank you for your comment.
184.	Anonymous	No	Thank you for your comment.
185.	Anonymous	No	Thank you for your comment.

186.	Xavier Bouteyre, Louxor Limited	No	Thank you for your comment.
187.	Mohammed D Aljohani, Freelancer	I think this issue concerns other concerned parties	Thank you for your comment.
188.	Anonymous	No	Thank you for your comment.
189.	Kurt Vercammen, Spitsdiam BV	No	Thank you for your comment.
190.	Anonymous	None that I could think of right now.	Thank you for your comment.
191.	Ezio Zacchei, Bureau Veritas Italia SPA	No	Thank you for your comment.
192.	Anonymous	No	Thank you for your comment.
193.	Lo Quoc Thanh, D.I Limited	For us, it is cover almost the cases for the risk in supply chain process.	Thank you for your comment.
194.	Anonymous	No	Thank you for your comment.
Question 13: What other industry initiatives/frameworks/certifications should RJC work to align and/or harmonise with?			
195.	Rahul K. Desai, International Institute of Gemology	Educational Drives, seminars, Workshop to create awareness to final consumers and members	Thank you for your comment. The RJC is provides members with the tools where possible to help in their understanding and implementation of the standards. This includes webinars, mailbox support, 1-1 meetings, toolkits and templates where relevant.
196.	Anonymous	Take a closer look at ISO 26 000 and Michel Capron's thoughts.	Thank you for your comment. The ISO26000 Standard was taken into account in developing our Standard, however, as this is a non-certifiable standard only serves to set out guidance on best practices at a generic level for all industries. The Laboratory Grown Material Standard has been developed to align to our existing Code of Practices Standard to provide a seamless approach for members dealing in both natural and lab-grown gemstones and to address the specific requirements of the watch and jewellery industry.
197.	Eyal Atzmon, El-Ran	I think that a pollution and environmental rating shall be added and apply mandatory	Thank you for your comment. The RJC would not be the appropriate organisation to create such an environmental rating. However, we will continue to review any initiatives in this area and see whether it is appropriate to signpost these in the Guidance document.

198.	Philip N. Grima, CKC Jewellery Co., Ltd.	Follow terminology of CIBJO	Thank you for your comment. We are actively involved in the CIBJO nomenclature initiative and always strive to find alignment with this and other relevant references where possible, e.g. the FTC Jewellery Guides.
199.	Anonymous	Accept LBMA/LPPM "responsible" certificates as legitimate part of CoC	Thank you for your comment. As the lab-grown materials are not in scope for the COC Standard this is not in scope for this consultation.
200.	Michal Koselja, ELI- ERIC	labs dealing with material research for optics	Thank you for your comment. The RJC scope is limited to materials used in the watch and jewellery industry, so material used for optics would be out of scope.
201.	Anonymous	I do not know now	Thank you for your comment.
202.	Mohammed D Aljohani, Freelancer	We wait and watch what AI creates in this field	Thank you for your comment.
203.	Kurt Vercammen, Spitsdiam BV	cant think of anything	Thank you for your comment.
204.	Anonymous	The usual ones, LBMA, RMI, KP, etc.	Thank you for your comment.
205.	Ezio Zacchei, Bureau Veritas Italia SPA	For Example: UNI PDR 125:2022 UNI EN ISO 14064-1:2019 - ISO 37001:2016	Thank you for your comment. ISO14064 has been referenced in the Guidance Document. We will add the others to the list of potential standards for benchmarking.
206.	Anonymous	Import regulations for producers from the Far East	Thank you for your comments.
207.	Anonymous	a specific certification on lab grown	Thank you for your comment. The Laboratory Grown Material Standard is a stand-alone certification covering the responsible sourcing and business practices of members handling these materials and does not cover any quality or technical aspects. As such it would not be appropriate for the RJC to develop such a certification.
208.		The participants mentioned ISO 18323.	Thank you for your comment. ISO18323 is signposted in the Guidance Document.
Question 14: General comments			
209.	Chloe, Hirlal Gems	Name what it is, industrial massively produced material.	Thank you for your comment. The term lab-grown is widely acknowledged in the industry and is used in many territories. The RJC requires full transparency to permit customers and consumers to make informed choices.

210.	Pia Wittendorf, Pernille Corydon Jewellery	We do not use Diamonds or Labgrown Diamonds	Thank you for your comment.
211.	Mohammed D Aljohani, Freelancer	Thank you for the continuous interaction on all industry events and news	Thank you for your comment.
212.	Anonymous	I read your draft. In my opinion, you have let complexity overkill supersede common sense and the environment. All of the accounting, notifications public statements, employee training and advice to counterparties can be handled with reference to diamonds. There should then be a compliance section on how Lab Grown are differentiated in memos, invoices, storage, tagging, etc. To restate all the other compliance a second time for Lab Grown is redundant, time consuming, too long for most people to read understand and comply, when printed kills extra trees, pollutes the world with extra ink and has a negative impact on global warming. Let's keep it simple.	Thank you for your input. We have maintained alignment between the Code of Practices and Laboratory-Grown Materials Standard where relevant, but maintain separate certifications in order to have a clear differentiation between natural and lab-grown materials. Audits can be combined and the approach to further streamline the experience for members is a point of continuous improvement for us at the RJC.
213.	Anonymous	Point 27.3.d.ii Which says ii) include either inhouse testing , using relevant and effective detection equipment , or outsourced testing by a qualified service provider such as a gemological laboratory. Should be limited to : Must include a certificate by an independent ISO and RJC certified gemological laboratory.	Thank you for your comment. This provision mirrors the requirement in our Code of Practices Standard and it would be an over-reach to set a higher standard for members using laboratory grown materials rather than natural gemstones. We will consider this point when we are next reviewing both Standards.
214.	Anonymous	Since you are asking for opinions from all corners of the industry : CIBJO decided that the correct word should be " synthetic" and not "lab grown" because there are many other synthetic stone materials coming from different process and they are simply known as synthetic which is exactly what Lab Grown stones are. CIBJO recommended that LGMS should be known as Synthetic material since it is.	Thank you for your comment. We are aware of the CIBJO position, however in many territories laboratory grown is the generally accepted term and has gained acceptance. The RJC takes the position that members can use the term synthetic or lab-grown as long as their descriptions are clear and not misleading and, may well use different terms in different territories depending on the legal requirements.

215.	Anonymous	Thank you for the opportunity to participate in this. Natural diamonds and their magical allure are in danger, grave danger. Their perceived value and investment quality have taken a huge hit. Today diamond values are lower than they were 20 years ago. One look at the old Rapaport list of 2004 and you see it. Discounts on Rap today are even larger than back then I remember. The future looks grimmer everyday. We often wonder if there is a future for this trade. Today it's estimated that 20% of natural diamond traders will not make till end of the year. Lab grown diamonds are an existential threat to natural diamonds. They should be treated as such. De Beers made the deadly mistake of introducing them and marketing them for the wrong reason of pressuring the Botswana government and improving their bargaining position. Like every decision De Beers has made starting with the 'supplier of choice' years ago, it was wrong and detrimental. Their u-turn this year only proves that. Look at what's happening to the natural diamond market now. One thing the De Beers can do now is perhaps forbid it's sightholders from dealing and the anti-diamond of lab gowns. In its turn, GIA jumped on the opportunity of more business and also made the wrong choice of grading lab grown, further embracing and normalizing its acceptance by the consumers, who in their turn, will loose all their investments in lab grown diamonds. GIA might be in the process of rethinking its position on this. They have definitely seen a drop in their natural diamonds business income. Martin Rapaport, probably the best market analyst for a very long time, has rightfully distanced himself from lab grown. Moreover, he is now the leading voice against lab grown. He knows firsthand the damage they're doing to natural diamond prices. He has been the postman whom everyone wanted to shoot. I am sure it's no pleasure for him to continually drop prices as he has done over the last two years. Today if you walk around jewelry stores in New York or Antwerp, you'll find the majority trying to sell lab grown as natural diamonds. Or at least embed some lab grown in natural	Thank you for your comment. The RJC does not take a position or give preference to natural versus laboratory grown materials, but has developed this Standard to create a level playing field and promote responsible business practices for all entities in the value chain from growers/producers to the retailers, whatever materials they are handling. The Laboratory-Grown Materials Standard does include clear requirements for product disclosures and for claims and descriptions to be verifiable and not misleading to ensure that customers and consumers can make informed choices.
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		diamonds pieces to further their profits. All this with time will only erode the consumer's confidence in natural diamonds. Lab grown have created opportunities for many dodgy jewelers to cheat hapless consumers. At the end, the natural diamond business will pay the price. RJC, the market leader in insuring best practice principles, must stay away from lab grown businesses and its clients. This is a time to take the lead and avoid further elevation of lab grown. Commercially it is surely tempting to jump on the bandwagon of profit, but at which cost. Possibly putting its existing natural diamond clients at risk of bankruptcy and eventually losing them. I, as am sure as many, call on you not to engage in lab grown and its jewelers. kindly lead us rather than mislead others.	
216.	Anonymous	I have tried to give feedback via the Microsoft Forms questionnaire, but I failed. Just like the proposed LGMS Standard, the questionnaire is just way too overloaded. The Standard itself looks as if many people have put a lot of effort into building it, and I admire the work. The result is, unfortunately, a non-practical bureaucratic monster that in my opinion will fail its purpose. What started out as a good idea is at a stage where it will be almost impossible for most industry stakeholders to comply with. Sorry to say so.	Thank you for your comment. We will be monitoring the uptake and feasibility of the Standard implementation and will review all elements at the next review, which will begin within 5 years in line with the ISEAL requirements.
217.	Anonymous	Will there be critical provisions? Suggest guidance/definition section to define words or phrases for the member and auditor, such as: "dependents where relevant" (LGMS 15.9) Contractors/subcontractors Beneficial ownership "affected people or group" (LGMS 6) Request for RJC to consider harmonization to SCS' 007 Certification Standard for Sustainability Rated Diamonds, alignment and ease for SCS clients/RJC Members pursuing certification against both standards.	Thank you for your comment. Critical provisions are being defined and the glossary of terms will cover all relevant terms. We have noted the request to benchmark the SCS 007 Standard and this will be followed up separately.

218.	Anonymous	Incorporate Step 3 of OECD requirements, Risk Mitigation and Risk Management, as a sole provision under LGMS 7. This can be applied to human rights, child labor, forced labor concerns identified during the audit period and immediately highlighted to the auditor for review. It would also prompt members to specifically prepare a procedure for risk mitigation and management.	Thank you for your comment. Laboratory Grown Material Standard (LGMS) provision 7 has been written to align and mirror the requirements in the Code of Practices and it would therefore not be possible to implement such changes at this time. However, all 5 OECD steps are required as part of LGMS 7.
219.	Anonymous	Incorporate requirements to follow FTC guidance.	Thank you for your comment. Members trading in the US are required to follow FTC guidance under the relevant provisions and the requirements of Laboratory Grown Material Standard (LGMS) provision 1 Legal Compliance.
220.	Anonymous	To what extent will this apply to Wholesale/ Retail level handling LGMs? Seems more applicable to members who are LGM producers only; will RJC implement a new fora that identifies just LGM producers? Similar to identifying Trader/Refiner/hedger fora in metals.	Thank you for your comment. A new Laboratory Grown Material Standard Producer forum has been created. The Standard is relevant to all sectors in the watch and jewellery supply chain in the same way that the Code of Practices applies. There are couple of Laboratory Grown Material Standard producer specific provisions but this makes up a minor number of the overall provisions.
221.	Anonymous	27.3d- suggest using "Laboratory Grown Materials" instead of "Laboratory Grown Diamonds" and "Laboratory Grown Colored Gemstones", to ensure all LGMs are covered.	Thank you for your comment. The Standard references Laboratory Grown Materials in this Provision.
222.	Anonymous	I would like to offer my feedback regarding lab-grown diamonds, which I believe are fundamentally different from natural diamonds. Given that most people cannot readily distinguish between the two, I strongly recommend enforcing strict penalties for any instances of mixing natural diamonds with lab-grown products. Additionally, it is imperative to clearly label and inform buyers that they are purchasing a lab-grown product, not a natural diamond. The unrestricted production of lab-grown diamonds results in a value that is significantly different from that of natural diamonds. Furthermore, it is essential that the same rigorous standards of fair labor, environmental quality, and related practices be upheld within this industry.	Thank you for your comment. The RJC has developed this Standard to create a level playing field between those dealing in natural gemstones and those working with laboratory grown materials and promote responsible business practices for all entities in the value chain from miners/growers/producers to the retailers, whatever materials they are handling. The Laboratory-Grown Materials Standard, which is a separate standard to the Code of Practices, does include clear requirements for product disclosures and for claims and descriptions to be verifiable and not misleading to ensure that customers and consumers can make informed choices. The RJC does not have the authority to impose penalties as this would be the responsibility of local trade enforcement authorities, but cases of deliberate mixing of materials without

			appropriate disclosure would lead to non-conformances in the members RJC audit that could give rise to disciplinary action under the RJC's membership criteria.
223.	Anonymous	Note the "laboratory-grown" is inappropriate. question as to whether the synthetic industry has been consulted	Thank you for your comment. The term lab-grown is widely acknowledged in the industry and is used in many territories. In territories where there is a legal requirement for the term synthetic to be used, RJC Members will have to comply with this. This consultation, including discussions on terminology and nomenclature, has been public and included all parts of the industry.
224.	Anonymous	25 waste and emissions, does it have to what level is there a certain level of waste or if you hit too much waste, then you're not allowed to be in the group? is there kind of parameters for qualification in the LGMS?	Thank you for your question. Laboratory Grown Material Standard (LGMS) provision 25 does not set any specific ceilings for waste or emissions, but sets out requirements for members with significant emissions to set rolling targets for improvement and to provide public reporting on their performance.
225.	Anonymous	it's important to keep point on IP considering that there are new technologies coming out every single, I would say month at this point. You know, whether it's based on configurations of machines, whether it's IP, based on what percentage of gases you use so fourth as well what materials you use in the growing process.	Thank you for your comment. We have introduced the additional requirement under Laboratory Grown Material Standard (LGMS) provision 1.2 to cover this point and will monitor whether there is a need to strengthen further at the next review.
226.	Anonymous	How does this provision go about policing IP and protecting organisations IP?	Thank you for your comment. The RJC does not have a role in policing IP, but has set a requirement for respecting IP. The third-party auditors will verify whether members have procedures to ensure respect of their business partners' IP and whether any cases of breach of IP have been recorded. We will be monitoring whether there is a need to strengthen further at the next review.
227.	Anonymous	I think it is important not to be overly onerous for natural or lab grown materials and instead take a balanced approach	Thank you for your comment. The RJC has tried to take a balanced approach on the requirements and has aligned the Laboratory Grown Material Standard to the Code of Practices to create a level playing field between the two sectors.

228.	Anonymous	So in terms of definitions, how do we do it? Because for example, France has now banned the use of lab grown and is decided to go with synthetic. Similarly, the US has a different standard as well. So how is this going to be defined such that you manage every jurisdiction as well? I would suggest is mentioning in there that it adheres to the basic requirement is to adhere to the jurisdiction in which you operate.	Thank you for your comment. The requirement to use terminology that meets the requirements of local markets is covered under Laboratory Grown Material Standard (LGMS) provision 1 Legal Compliance and LGMS 27.1 Product Disclosure.
229.	Anonymous	Certain statements have to be included in invoices, certain disclosures have to be made for various legal requirements and how best to sort of make sure we're clear between the different materials that are included in these in these invoices. As I say, this is probably more of a guidance comment than it is and it's probably more from a in order to benefit maybe than the members themselves. This is always a really difficult area for the auditors to make sure that the members can clearly disclose the different materials that they're handling and to make sure that they're also having to include all their various statements that they need to.	Thank you for your comment. The RJC has included guidance on the disclosures and will provide further training as required to auditors. This will be further covered in the auditor roundtable meetings.
230.	Anonymous	I think only if we can describe what non-permanent means. I think that would be useful because it leaves a lot of interpretation as to what is considered permanent or non-permanent. I mean again to my mind if you use the word non-permanent and you HPHT a stone again then it's not permanent. You know, the idea of permanence is once you've done it, you can't change it again, which is that we need to find that in the guidance.	Thank you for your comment. We have defined "Enhancement in the context of laboratory grown materials, refers to any process, other than cutting and polishing, applied to the stone after the growth process, that alters a stone to improve its appearance (e.g., colour, clarity), durability, value, or availability. " Please advise if you have suggestions for improvement of this definition.
231.	Anonymous	There is another framework that Marty Horowitz is doing as well called GDTO, you also have SES as well as SMETA	Thank you for your comment. We can only consider other certification programs rather than initiatives but will review any that are put forward.

232.	Anonymous	is that going to be any sort of scaling, or grading of how successful somebody is in order to achieve your mark, achieve your standard? So there's a merit credit distinction in terms of what they're achieving within the COP.	Thank you for your comment. RJC Members are not graded. There is a requirement for all members to achieve certification within 2 years of joining and to maintain this. Certification can only be granted where members have been able to evidence conformance to all aspects of the Standard. Where non-conformances are identified and graded as Critical or Major must have been addressed with sufficient evidence of implementation prior to a certificate being awarded. Members may continue to work on Minor non-conformances during their certification cycle but must close out all findings before the next certification or surveillance visit. The procedures are covered in the Member Certification Handbook available on the RJC website.
233.	Anonymous	The more standardised you make it, the easier it is to go through and I think that's what you have to sort of work towards. Would suggest having an entire kit for even the auditors so that you have an even set of audits all the way through. So even the auditors who are certified RJC auditors are looking exactly at the same lens as everybody else's.	Thank you for your comment. We do provide training for the RJC auditors to standardise their understanding and approach to the audit.
234.	Anonymous	In terms of traceability, I think it would be great to include sections on where the stones are created and where they go throughout the supply chain. But I do think it's important across the board that people should be responsible for disclosing the origins of their materials. And I think that this is much easier to facilitate in the lab grown world, which is also why customers are so much more interested in moving to man-made stones because of the ability to trace it. So I think it's one of our strengths.	Thank you for your comments. The RJC is working on additional guidance in the area of traceability, and especially traceability claims.
235.	Anonymous	one thing I would add is that you could extend this to treatments as well and potentially other parts of the process too.	Thank you for your comment. We will be monitoring this area through the initial implementation and review whether additional requirements should be added at the next review.
236.	Anonymous	I think it's just making sure everyone has a very visible runway to work with and a care timeline so that they can get this implemented, especially producers	Thank you for your comment.

237.	Anonymous	I have an issue on the product disclosure because according to the scope that you, you said that for the lab grown material actually for the lab grown it is referred specifically to polythynthetic material which isn't covered to any other man made stone. But in the first scope of applicable, you said that the lab grown material there's a whole or partial composite constructed and restructures. My point is if you're talking about composite, this mean that just one part that composed in the stone is Lab grown is covered in this standard, right And also the term constructed and restructured, I don't really understand what is the meaning.	Thank you for your comment. We clarify further on the use of these terms in the Laboratory Grown Material Standard guidance as well as providing definitions in the glossary https://www.responsiblejewellery.com/glossary/ .
238.	Anonymous	And the second point why you just mentioned only coatings in the second line on natural or lab grown, stone coating is a treatment and you said it's on natural or lab grownstone. So what is the meaning?	Thank you for your comment. We clarify further on the use of these terms in the Laboratory Grown Material Standard guidance as well as providing definitions in the glossary https://www.responsiblejewellery.com/glossary/ .
239.	Anonymous	I think you just need to make clear which one is coming and which one is not enhancement because as the creator maybe they are not sure which kind of treatment considering permanent, which one is not permanent?	Thank you for your comment. We have defined "Enhancement in the context of laboratory grown materials, refers to any process, other than cutting and polishing, applied to the stone after the growth process, that alters a stone to improve its appearance (e.g., colour, clarity), durability, value, or availability." Please advise if you have suggestions for improvement of this definition.
240.	Anonymous	As to whether we call these treatments or enhancements or whatever, from my perspective, it's not too important in the context of a lab grade material.	Thank you for your comment.
241.	Anonymous	I think any sort of certified carbon footprints and emissions reports that are compliant with the GHG protocol, I think it would be good if they were accepted as part of the audit here for the emission section.	Thank you for your comment. Evidence of such verified reports would be considered acceptable to prove conformance with this provision. This has been covered in the Laboratory Grown Material Standard Guidance Document.
242.	Anonymous	I think the Federal Trade Commission pretty much covers this particular issue significantly that I understand that only applies to the United States. I don't believe it's the same in Europe in other parts of the world, but I think the framework that the FTC is using would be very applicable to what the RJC is trying to do.	Thank you for your comment. As a global Standard, we have to set requirements that could be met in all jurisdictions and would comply with local regulations, which as you say are different in US and Europe.

243.	Anonymous	And there are jurisdictions, France especially, where it's a seat of high jewellery, they don't even recognise the term. I find that somewhat contradictory and troublesome.	Thank you for your comment. We have allowed for members to use the terminology that meets the requirements in their local jurisdiction in Laboratory Grown Material Standard (LGMS) provision 1 Legal Compliance and LGMS 27.1 Product Disclosure.
244.	Anonymous	I think that this should not be glossed over because this is probably one of the most controversial sticking points. So to go ahead and figure out how to set a standard that's going to cover all of the countries and at the same time meet the minimum standards, you're going to have a great deal of objections from a lot of people who are in the lab grown business that feel that the bar is being set too high. I would love to see some sort of a clearly stated statement that the product is not a product of nature.	Thank you for your comment. The provisions on Product Disclosure and Claims outline the requirements on transparent and accurate claims to ensure lab grown materials are clearly labelled and marketed to consumers and business partners. This needs to be clearly provided in the product name and description at the point of sale. The Laboratory Grown Material Standard Guidance provides further support on implementing this provision.
245.	Anonymous	I think it comes down to your wording as to how you define what is the acknowledged best practise for product disclosure, because we all, we all want the same thing. That's the consumer not to be misled as to what they're buying	Thank you for your comment. We have added guidance on this topic into the Laboratory Grown Material Standard Guidance Document and will continue to review implementation to see whether further information and training is required.
246.	Anonymous	I think the verbiage we use because words matter has a big impact on how information then gets disseminated and watered down as it philtres through to the consumer.	Thank you for your comment.
247.	Anonymous	The word process is a word without bias enhancement definitely has an angle to it. The point about non permanent that must be disclosed, the technical point.	Thank you for your comment. We have defined "Enhancement in the context of laboratory grown materials, refers to any process, other than cutting and polishing, applied to the stone after the growth process, that alters a stone to improve its appearance (e.g., colour, clarity), durability, value, or availability. " If you have suggestions on improvements to this definition please let us know.

248.	Anonymous	Almost every major producer is going through SCS because it's starting to become the required nomenclature if you're an OEM for any larger retailer or a brand globally. And being that they're also doing traceability all the way from the speed going till the consumer, that is starting to become a benchmark conversation from a sustainability perspective. Net zero Compliance, traceability, because they're covering a lot of pillars. But while we've done, because what they do is they under their umbrella SMETA and everything gets covered. And also they're In Sync with the European EU upcoming laws, they're In Sync with the USFTC and also being acknowledged as the new requirement for the Tier 1, Tier 2 brands globally.	Thank you for your comment. We are aware of these other initiatives and have taken them into account. We will be benchmarking initiatives for harmonisation in due course.
249.	Martin Rapaport, Rapaport Diamonds	The following statement should be required on all marketing material, grading reports, and invoices for synthetic diamonds. <i>"Synthetic 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."</i> More detail on the comment can be found here.	It is not the role of the RJC to comment on the values of any product, whether natural or lab-grown, including fluctuations or changes in the commercial market value of a given product. However, a number of safeguards are in place in relation to product descriptions, appraisals, and claims in relation to laboratory grown materials. Provision 27 of the Laboratory Grown Material Standard (LGMS) ensures that all legal requirements with regard to product disclosure are adhered to; • Provision 28.4 covers the requirements in relation to reports assessing monetary value; and • Provision 12 covers claims, with particular reference to the fact that all claims (which would include any claims in relation to the current or future monetary value (or potential appreciation in value) must be verifiable, this includes the requirement that these disclosures must be unambiguous and not misleading and verifiable.

			Compliance with all of these requirements is verified by the 3rd party auditors at each audit.
250.	Martin Rapaport, Rapaport Diamonds	All treatments of synthetic diamonds to enhance color, clarity or other characteristics should be subject to the same disclosure requirements as natural diamonds.	Natural materials and laboratory grown materials are created differently and unlike natural materials where a treatment alters the “naturalness” of the product, it is not so with man-made materials. A variety of methods are used to produce laboratory grown materials some of which may enhance or change the colour or clarity of the material, this is viewed as being part of the manufacturing process as opposed to altering what nature has created. However, the RJC recognises that additional treatments or enhancements may be applied after the production and that some enhancements may not be permanent and could degrade over time. As a result, Provision 27.2.m of the LGMS requires that any enhancements performed on a lab-grown material that are deemed to be unstable or non-permanent must be disclosed.
251.	Martin Rapaport, Rapaport Diamonds	Synthetic diamonds should be subject to the same Patriot Act, AML, CTF compliance requirements as natural diamonds.	The LGMS was created to ensure a level playing field and ensure that members handling laboratory grown materials are held to the same high standards on responsible sourcing as those handling natural materials. As you will note, the LGMS mirrors the Code of Practices in many of its provisions and this includes a requirement to maintain awareness of and compliance with applicable laws (LGMS Provision 1). In addition, the relevant provisions relating to Supplier Due Diligence (LGMS Provision 7), and Know Your Counterparty, Anti-Money Laundering and Financing of Terrorism (LGMS Provision 10) include equivalent
252.	Martin Rapaport, Rapaport Diamonds	We are deeply concerned that the RJC suffers from serious conflicts of interests and governance problems as it seeks to establish standards for the diamond, gem, and jewelry industry. A case in point is the establishment of standards for	The RJC’s Board, Executive Committee, Standards and Assurance Committees and Expert Consultants are comprised of various members of the industry which allows for varying perspectives. The Standards Committee specifically is comprised of

		proper disclosure of value retention related to synthetic diamonds. More detail on the comment can be found here.	equal numbers of Industry and Non-Industry representatives with a Co-Chair from each of these groups. Industry members come from across the RJC membership fora with 2 members from each group to ensure that no single group can apply undue influence. Non-industry members have been appointed based on their personal experience and topic expertise. This varied makeup coupled with the requirements of the ISEAL Standards Setting Code ensures that no one single member has control of the standards development process. The RJC Board is elected through an inclusive Annual General Meeting (AGM) process in which RJC members can nominate and vote for individuals from RJC member companies to take up positions on the Board. The AGM is conducted using an independent 3rd party platform to ensure credibility and fairness to the process. Officers and directors nominated and elected by the RJC membership are done so in their personal capacity not as a representative of any particular member, as is detailed in the RJC's incorporation documents. Regarding decision making on standards, the Standards Committee makes a recommendation on the updates and changes to the standards. The recommendation requires endorsement from the Executive Committee before being presented to the Board, which has the sole discretion as to whether to adopt a new or revised standard.
253.	Martin Rapaport, Rapaport Diamonds	The Rapaport Group supports the idea that consumers are best served by having the broadest basket of products and services. We support the idea that synthetic diamonds should fairly compete with natural diamonds. However, it is vital that full and fair disclosure be made regarding synthetic value retention. The absence of such full and fair disclosure means that synthetic diamonds unfairly compete with natural diamonds. The results are disastrous for the natural diamond trade and consumers who have purchased synthetics at outrageous prices and markups.	It is not the role of the RJC to comment on the values of any product, whether natural or lab-grown, including fluctuations or changes in the commercial market value of a given product. However, the RJC has included requirements to ensure that customers, including consumers, can make informed decisions based on clear product disclosure and verifiable claims.

		In the case of synthetic diamonds, the failure of the RJC and the trade to implement full disclosure regarding value appreciation has resulted in severe damage to our industry. More detail on the comment can be found here.	• Provision 27 of the LGMS ensures that all legal requirements with regard to product disclosure are adhered to; • Provision 28.4 covers the requirements in relation to reports assessing monetary value; and • Provision 12 covers claims, with particular reference to the fact that all claims (which would include any claims in relation to the current or future monetary value (or potential appreciation in value) must be verifiable, this includes the requirement that these disclosures must be unambiguous and not misleading. Compliance with all of these requirements is verified by the 3rd party auditors at each audit.
254.	Martin Rapaport, Rapaport Diamonds	Windfall Profits For Synthetic Diamonds - Synthetic Diamond Profits and MarkUp More detail on the comment and data can be found here.	It is not and never has been the role of the RJC to comment on the values of any product, Natural or laboratory grown materials, this includes fluctuations or changes in the commercial market value of a given product.
255.	Martin Rapaport, Rapaport Diamonds	RJC Misrepresentation of Standards Development The RJC announces “We want our standards to include input from every corner of the industry,” yet it ignores input that does not suit the financial interests of its’ leadership. Essentially, the RJC talks the talk but does not walk the walk. ... The RJC could and should have taken more proactive measures regarding full and fair disclosure regarding synthetic diamond value retention. More detail on the comment can be found here.	The RJC strictly adheres to the ISEAL Standards Setting Code. All comments received are reviewed and responses are made available on the RJC website. However, the Standards development process does not include a process for responding directly to individual stakeholders submitting comments. The minutes of the Standards Committee meetings provide a brief summary of points discussed and do not go into detail, but a consolidation of comments received, and their relevance is discussed, especially in the face-to-face meetings held to review the draft procedures in detail. As mentioned previously, it is not the RJC’s role to comment on values or value retention and such points are considered out of scope.

256.	Martin Rapaport, Rapaport Diamonds	The Rapaport Group wants to see the RJC succeed. We want an ethical industry. We want the RJC to correct its problems and manage its conflict of interests and governance issues in a responsible manner. We want the RJC to create standards that are relevant to small and medium size jewelers and dealers and not just orientated to bigger companies. The RJC must recognize that the hundreds upon hundreds of pages of standards cannot be absorbed by the vast majority of our trade. More detail on the comment can be found here.	We welcome the support included in this statement. The RJC's objective is to create industry developed standards that support responsible business practices throughout the industry from mine to retail. Membership of the Standards Committee comprises industry representatives from the various membership categories (fora) who bring expertise of their sector, and this is supplemented by non-industry representatives with specific areas of expertise. While many of these representatives may come from large companies, they also have supply chains that include companies of all sizes, and it would not be in their interest to promote unachievable requirements for these business partners. In the most recent Standards Committee discussions for development of the Code of Practices Standard, Chain of Custody Standard and Laboratory Grown Material Standard, many of the discussions centred on the need to provide guidance for smaller companies on how best to implement the requirements in the Standard. The Guidance documents include clear guidance and tips for Small and Medium Sized Enterprises, with reference to specific tools to support such members. This is further supported by additional toolkits, webinars and training for both members and auditors. The consultations on the standards also included dedicated questions on SME feasibility and at all stages took into account SMEs when developing the requirements. With respect to the integrity of RJC standards, all members are audited through an entirely independent third-party process. Certification decisions are made by the independent third-party audit firms who are the certification bodies, and not by the RJC. In addition, the RJC reviews audit reports on a sampling basis for quality and consistency. Additional oversight with respect to the assurance system (audit and certification) is provided by Assurance Services International, an independent and widely respected agency which is
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