

RJC Chain of Custody 2017 Review – Comment Report with responses on round 1 consultation

This document includes a summary of comments received as part of the round 1 CoC review as well as responses to these comments. These comments were received between September and December 2022.

Table 1 – Comments and responses on the Chain of Custody Standard from round 1 consultation.

No.	CoC Provision/ Topic	Name	Comment	Response
General comments				
1.		Grant Crosse	There was talk of incorporation of ESG elements into the COP. When will that be taking place?	This is not a current focus of the COP but was discussed to understand stakeholder input on the potential future inclusion of ESG elements into the standard. We welcome further comments as part of the next consultation of the COP.
2.		Sara Yood	The term grandfathered has a racist history in the United States. I would suggest substituting with the word legacy material or something similar.	Globally (and the OECD) the current use is grandfathered. Suggestion is to use alternative word 'legacied', with cross reference to alternative words/defintion that includes grandfathered.
3.	CoC 2.5	Richemont	Refiner entities, cutters and polishers shall maintain internal material control systems that allow for the reconciliation of movement of inventory in and out over a given time. Gold refiners shall additionally collect and, with due regard to business confidentiality, share information on the mine of origin of mined gold received with the RJC each year.	This was an oversight from an earlier draft and will be revised.
4.	CoC 3.1	Richemont	This provision must be modified to reflect the distribution scheme of some RJC members, where the finished products are distributed from the manufacturers to the final customers by their affiliate distribution entities, with transfers of	Thank you for this comment which raises an important point in relation to the distribution of finished items. Where such items can be clearly shown to be identifiable, and a documented due diligence has been conducted to ensure appropriate



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			ownership but no product transformation (logistics, transportation, and retail only). For this type of scheme, we must find a way that enables a CoC claim at the point of sale without the obligation to certify all the worldwide distribution entities (no added value, but for sure, a business for the auditing companies).	segregation (especially in cases where visually similar items are being sold in both CoC and non-CoC versions) audit of each step in the distribution chain would be superfluous. The CoC standard provision (old provision 5, new provision 3) allows for outsourced service companies, and it is proposed that affiliate distribution entities be treated in the same way. Under the current guidance they would be classed as low risk and would not require audit but would need to be declared and identified in the certification. Some additional wording will be added to the draft standard and the guidance will make clear the requirements for Members and Auditors.
5.	CoC 4.1	Richemont	e. Processing residues, including tailings whether ceased or currently active , that contain trace precious metals from which mining by-product can be extracted, for which an eligible material declaration may only be issued by the refiner.	Useful addition – we will revise the draft accordingly.
6.	CoC 8	Richemont	For better understanding: as the COC transfer document is mentioned in that provision, as this section is mainly dedicated to how to fill the transfer document, and as the eligible material declaration is a specific case of the usage of the transfer document, this provision, this section should be merged with the “COC CONSIGNMENTS AND TRANSFER DOCUMENTS” provision	It is understandable that this might seem a simplification but the main focus of provision 8 is about what is eligible material (although it touches on Transfer Documents, however, the provision on CoC consignments and transfer documents is contains very specific requirements. Combining the two would make this provision very long and potentially harder to understand.
7.	CoC 8.2	Richemont	For eligible mined material, the entity shall include in the CoC transfer document a conflict-free declaration that identifies if provision 64.3a, b or c applies: a. If provision 46.3b applies (the material is located in conflict-affected or high-risk areas but is confirmed as not	This sub-clause will be reformatted to match this request

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			having adverse impacts), an appendix summarising the entity's due diligence for that material. b. If the material is mined, the country or countries where it was extracted. c. If the material is mining by-product, the country or countries where it was refined.	
8.	CoC 8.3	Richemont	When initiating a CoC for material that will be mixed with existing CoC material before transfer to another entity, the entity shall record an eligible material declaration in an internal CoC transfer document or maintain pieces of evidence proving the eligibility of the material.	This would be a logical addition to reflect the additional guidance issued in August 2021 and will be included in the next draft.
9.	CoC 9.1	Richemont	We propose to add a digital link and request a COC transfer document for entities and outsourcing contractors not included in the member's certification scope: The entity shall ensure that a CoC transfer document accompanies and, wherever possible, is physically attached or digitally linked to each shipment or transfer of CoC material dispatched to other certified entities not included in the member's certification scope , outsourcing contractors not included in the member's certification scope , or service companies.	The addition of a digital link rather than physical document can be useful for those companies who have advanced systems and would be a logical extension of the August 2021 guidance and will be added to the next draft. The guidance document will also reflect the conditions under which the issue of transfer documents may be suspended. However, routinely excluding the issue of transfer documents to entities included in a Member's certification scope would appear to create a break in the chain of custody documentation if products were transferred to an external party at a later date.
10.	CoC 10.2	Richemont	B to B and B to C situations must be separated. B to C: Claims can be made on finished jewellery products that include non-CoC components identified for exclusion by the RJC	This provision relates to product claims what would apply in a B2C scenario. The requirement for a Transfer Document that complies to the relevant provisions in the standard is already a requirement in the Standard.

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			B to B: Claims can be made on jewelry products that include non-CoC jewelry components in accordance with the COC transfer document(s) supplying the material to the customer and with this provision	
11.	Annex 1 – CoC material transfer doc template	Richemont	The receiver's CoC certification data (certification number and dates) to be optional to complete, not mandatory.	The Annex has been updated to make this optional.
12.	Annex 1 – CoC material transfer doc template	Richemont	For B-to-B transfer doc: description of COC material should also be permitted, especially in case there are more non-COC materials than COC materials. In this case, the claim should be "X, Y, Z components are of COC material, and all the other components are of non-COC material"	A new draft material transfer document will be sent with the next draft of the CoC standard and will reflect an approach that allows Members to choose for any particular item whether the CoC or non-CoC materials are listed as long as the resulting claim is clear for any reader to understand and to obtain further information if required.
13.	Annex 1 – CoC material transfer doc template	Richemont	Type of mined material: add "Extracted from tailings"	The next draft will include this as a type of waste with further clarification included in the guidance.
14.	Annex 1 – CoC material transfer doc template	Richemont	TYPE OF MATERIAL CONTAINED IN TRANSFER (CHECK ALL THAT APPLY) – to be completed whatever the type of transfer is, except the type of mined material that needs to be completed for eligible mined material declaration only	This has been discussed internally but it is felt that the current requirement for completion should be maintained for transparency and clarity.

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15.	Annex 1 – CoC material transfer doc template	Richemont	CONFLICT-FREE DECLARATION FOR MINED MATERIAL - to be completed only if the transfer document is used to initiate the COC	Thank you for your comment. It is felt that the current requirement for completion should be maintained for transparency and clarity. The Member's due diligence process is expected to be sufficient to ensure that such a declaration is meaningful.
16.	Annex 1 – CoC material transfer doc template	Richemont	DRC and adjoining countries' information for Dodd-Frank reporting (to be completed if the transfer concerns mined gold or mixed gold without the information about whether mixed gold is only made of recycled and grandfathered)	This has been reviewed, but it is felt that the current requirement for completion should be maintained for transparency and clarity, especially given the proposed changes to the definition of "recycled".
17.	Glossary	Richemont	Add definition of end-user	Noted and will be incorporated once all requests for the glossary are gathered.
18.	Glossary	Richemont	Add definition of post-consumer.	Noted and will be incorporated once all requests for the glossary are gathered.
19.	Glossary	Richemont	'Provenance: the point where the COC for eligible or COC material started' - No proposal but the definition should be clearer	Noted and will be incorporated once all requests for the glossary are gathered.
20.	Glossary	Richemont	Outsourcing contractor definition to be completed in regard of the ownership of the COC material, which remains on the member's side.	Noted and will be incorporated once all requests for the glossary are gathered.
21.			Improve definitions contained in certain provisions, i.e. recyclable materials and different explanations in provision 4 internal material controls	Noted and will be incorporated once all requests for the glossary are gathered.
22.			When establishing chain of custody with a supplier, if the supplier is an RJC certified member, that should fulfill all COC	This applies to COP rather than CoC as the 2023 CoC does not have a separate provision for counterparty due diligence given

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			requirements for said supplier. In other words, RJC certified members should need not supply information requests from other companies seeking RJC certification regarding chain of custody. If a company is RJC certified, other companies seeking certification that do business with that supplier should be able to assume that the due diligence process the supplier went through to receive certification provides adequate assurance that said supplier is sourcing responsibly.	that Members must be certified to the COP before coming forward for this Standard. Further, under the COP, RJC certificates from suppliers is not enough to show proper due diligence has been conducted as the certificate does not include any information regarding the origin of the materials or products you are purchasing from them. OECD explicitly states that every company is responsible for their own due diligence and the responsibility to do this work cannot be passed down or up the supply chain.
23.		Josue Ruiz Ramirez	Please include a clear tab with relevant definitions. For example, it is now introduced a new section Eligible Investment Material, but it's not clear what's an eligible investment material. Sometimes auditors struggle to remind every single concept, so an easy to check tab with all relevant definitions would be beneficial for auditors.	Request noted – thank you.
24.		Robin Gambhir	The proposed changes substantially weaken the due diligence and reporting requirements of certified members. These changes are regressive, contemptible and provide cover for bad actors in the supply chains that provide materials to the industry.	The due diligence and reporting requirements are already included in the COP to which all Members must be certified prior to being certified for this standard. As such there has been no weakening of requirements, merely a removal of the duplication.
25.		Gianluca Pegoraro	Would be great to extend the CoC to other PGMs like Iridium and Ruthenium.	Material scope expansions would first have to be covered in the COP. The consultation of the COP has just closed but we welcome this feedback as part of the next review. It would then be possible for these to be included in the CoC.
26.		Natalia Uribe	To expand the scope of mined material to include all legitimate ASM sources and encourage the recognition by	No change has been proposed to this draft of the Standard. RJC will look to review this as part of a separate workstream in order to ensure this can be done accurately, credibly and

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			<p>the RJC of legitimate and transparent ASM assurance schemes.</p> <p>RJC Code of Practices provision 8.1.b encourages RJC members that source minerals directly from ASM producers to “use best endeavours to positively influence practices by working to:</p> <p>Reduce or avoid risks and provide for, or co-operate in, remedying adverse human rights and environmental impacts. Measurable risk mitigation should aim to promote significant improvement within a defined period from the adoption of the risk management plan.</p> <p>Support development opportunities for ASM communities.</p> <p>Actively participate in initiatives, including multi-stakeholder ones, that enable the professionalisation, formalisation and/or certification of ASM, as appropriate to the situation.</p> <p>iv. Seek to understand fair commercial terms and offer these to all ASM suppliers.”</p> <p>However, the current RJC Chain of Custody Standard provision 6.1, limits in practice the possibilities of the members’ engagement with the ASM, by only including three options in the existing standard c, b and d.</p> <p>Recommendations:</p> <p>To make the RJC standard more inclusive and to better align it with the spirit of the OECD Due Diligence guidance. We</p>	<p>inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p> <p>ASM is currently eligible CoC material under the mined material category, specifically fairmined and fairtrade. More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with asm stakeholders to develop this support.</p> <p>In reference to your proposal to send RJC a toolkit on Fairmined Gold, we welcome you to send this for us to consider.</p>

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			<p>propose a new category for eligible materials that could include: "Legitimate ASM , where documented due diligence has been performed as recommended by the OECD, measures are being implemented to mitigate the OECD Annex II risks, and a reliable traceability system is in place".</p> <p>In the same RJC Chain of Custody provision 6.1 in the item of eligible mined material "d. Mines that are subject to an RJC-accepted responsible mining assurance scheme and validated to conform with the RJC COP requirements as defined in provision 6.2", we recommend that guidance is provided as to how ASM assurance schemes</p> <p>3. To make more concrete and visible the promotion to engage or /and source from the artisanal and small-scale (ASM) sector within the standard. Otherwise, it will maintain the critical situation of the industry's lack of involvement and impact on the most vulnerable actor in the minerals supply chains.</p> <p>4. To Use and recognize the Fairmined audits results from the mines for the certified material during RJC CoC audits of the members. This action will facilitate interoperability between standards organizations, more transparency and use of the evidence, which may be translated to make the audits easier for companies engaged in both sustainable minerals' schemes.</p>	

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			<p>Last year, ARM presented the detailed toolkit to RJC to explain how Fairmined certification supports RJC Chain of Custody COC Standard (2017) provisions 1. Due Diligence, 2. Know Your Counterparty (KYC), 3. Management systems and responsibilities, 4. Internal material control 5. Outsourcing contractors and service companies, 6. Eligible Mined Material, 9. Eligible material Declaration, 10. COC Transfer Documents and 11. Product claims and Intellectual Property. We can share this analysis again for this suggestion.</p> <p>5. We do not clearly find encouragement to the certified RJC members to engage with the ASM sector within the CoC Standard. Unfortunately, we only see one reference to ASM in the mined material regarding due diligence. Our proposal is the standard may be a means to push for real commitments or KPI from the companies to engage with the sector. For instance, the creation of incentives for the RJC members to source or support through projects or investment with the ASM sector. Then, we propose a new provision to envisage clear orientation or incentives within the RJC CoC to reward brands who go the extra mile and promote them as examples to follow when sourcing from responsible ASM.</p>	
27.	CoC 2	Ambar Valles	<p>Internal Material Controls Provision 4 (now 2), regarding new 2.5 - <i>"Refiner entities, cutters and polishers shall maintain internal material control systems that allow for the</i></p>	The reference to cutters and polishers is being removed as this was an error from the earlier draft.

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			<i>reconciliation of movement of inventory in and out over a given time. Gold refiners shall additionally collect and, with due regard to business confidentiality, share information on the mine of origin of mined gold received with the RJC each year.</i> -- Please clarify whether these are two separate requirements and is there a threshold (i.e. mass balance review) for the first part that asks for reconciliation of movement in a given time, to account for calculation errors or inventory counts. Such as +/- 5% error rate in the mass balance review. Also, please <i>clarify "share information...with the RJC each year"</i> – does this mean, share during the audit, as an appendix to the report, or in the narrative section for this provision? Submitted to the RJC directly by the member? In other words, what would an auditor look for to assess this?	In regard to refiner members sharing information with the RJC, this requirement was included as provision 1.3. with the removal of provision 1, this is now included under CoC 2. The 2019 Code of Practices (COP) and Chain of Custody (CoC) standards both contain provisions that require RJC gold refiners to collect and, with due regard for business confidentiality, share information with the RJC annually on the country & mine(s) of origin of gold received. This information will enable Members to demonstrate their due diligence with Responsible Minerals Initiative (RMI) Gold Refiner Standard and/or the London Bullion Market Association (LBMA) Responsible Sourcing Programme, and be cross listed or remain cross listed with RMI, as applicable.
28.		Francesc Picanyol	I need from CoC real guarantees (evidences) about precious metal procedence	The RJC Chain-of-Custody (CoC) Standard defines an approach for companies to handle and trade gold, silver and platinum group metals in a way that is traceable and responsibly sourced. Therefore, our focus is on company management practices which help them to maintain traceability and segregation within their operations, which ultimately throughout the CoC the supply chain. We don't require members to disclose and provide guarantees on provenance publicly, however members can ask for this from suppliers. Any public disclosure of provenance would fall under COP 14 Provenance claims.

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29.	CoC 9	Aarón Pita	<p>Include the percentage of recycled content per type of material in the COC transfer document. (ej: 92% recycled gold)</p> <p>Aligning the RJC COC transfer document with other Chain of Custody transaction documents in the retail/fashion sector. Most of the COC standards include this kind of information to guarantee the sustainability claim (ej: X% recycled content, X% organic material, X% natural material, etc)</p>	<p>The COC transfer document is currently being reviewed and a revised draft template will be provided with the next draft of the COC standard. We will look at adding a percentage for mixed sources, but this will be a voluntary initiative for member who need to provide this for their customers.</p>
30.	CoC 5	Lotte Hoex	<p>To narrow down the definition of the “recycled gold” so as to avoid the risk of misleading customers regarding the actual ESG impacts of recycling gold that is simply being re-refined.</p> <p>To expand the scope of mined material to include all legitimate ASM sources and encourage the recognition by the RJC of legitimate and transparent ASM assurance schemes.</p>	<p>The definition of recycled is being revised. Thank you for your feedback.</p> <p>No change has been proposed on legitimate ASM to this draft of the Standard. RJC will look to review this as part of a separate workstream in order to ensure this can be done accurately, credibly and inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p> <p>ASM is currently eligible CoC material under the mined material category, specifically fairmined and fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This</p>

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				project will seek to collaborate with ASM stakeholders to develop this support.
31.		Jon Ellermann	The chain of custody standard should align with existing open source standards, including the CRAFT Code 2.0, and other already developed sourcing standards. These have been designed for the inclusion of small and medium scale producers into formal markets. If RJC is updating their standard, it should detail the chain of custody models that are suitable for which mineral/metal type (IP, Product Segregation, Mass Balance).	Thank you for your comment and this will be taken into consideration. RJC looks to harmonise and align with existing industry standards where possible and relevant. Alignment to any specific code would be discussed by the RJC Standards committee to review potential benefits to all stakeholders.
32.	CoC 4	Susan Wheeler	I recommend new category for eligible materials that would include "Legitimate ASM , where documented due diligence has been performed as recommended by the OECD, measures are being implemented to mitigate the OECD Annex II risks, and a reliable traceability system is in place". Also that guidance is provided on how ASM assurance schemes based on legitimate standards, could become recognized as "RJC validated mining assurance schemes".	<p>No change has been proposed to this draft of the Standard. RJC will look to review this as part of a separate workstream in order to ensure this can be done accurately, credibly and inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p> <p>ASM is currently eligible CoC material under the mined material category, specifically fairmined and fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support.</p>

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33.		Rodolfo Orozco	Segregation of eligible material according to CoCs standards needs to consider the operative context of RJC members. Asking to segregate material without reasons grounded on the on-field necessities and circumstances of its members and outright ignoring those creates unnecessary problems	Thank you for this feedback. It would be useful to have examples of specific requirements you believe are overly onerous so that we can consider these.
34.	CoC 5	Boukje Theeuwes	<p>Solidaridad would like to echo and amplify the recommendations that ARM already submitted to the RJC, around these two key issues:</p> <p>1) To narrow down the definition of the “recycled gold” so as to avoid the risk of misleading customers regarding the actual ESG impacts of recycling gold that is simply being re-refined.</p> <p>2) To expand the scope of mined material to include all legitimate ASM sources and to encourage the recognition by the RJC of legitimate and transparent ASM assurance schemes.</p>	<p>1. The definition of recycled is being amended in the new draft CoC.</p> <p>2. No change has been proposed to this draft of the Standard. RJC will look to review this as part of a separate workstream in order to ensure this can be done accurately, credibly and inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration. ASM is currently eligible CoC material under the mined material category, specifically fairmined and fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support.</p>
35.		UFBJOP	We have considered how to encourage the addition of ASM gold and whether it would be possible to recognise more ASM initiatives so as to be more flexible and simplify certain	No change has been proposed to this draft of the Standard. RJC will look to review this as part of a separate workstream in order to ensure this can be done accurately, credibly and

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			requirements to make them more attainable for ASM. RJC should provide robust, but simplified requirements before adding ASM into the CoC eligible materials.	<p>inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p> <p>ASM is currently eligible CoC material under the mined material category, specifically Fairmined and fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support.</p>
36.	11.2	UFBJOP	Should criteria a to g in 11.2 be cumulative or not? The consensus of our members is that 11.2 should be kept as it is no	Thank you, this is noted. We can provide further clarification in the Guidance, but effectively ALL the relevant conditions in 11.2 must be met.
The RJC is seeking stakeholder comment on the proposal that Members wishing to be certified to the revised Chain of Custody Standard must be certified to the 2019 Code of Practices Standard.				
37.		Aarón Pita	Absolutely appropriate. To obtain RJC CoC certification it is necessary to be RJC COP certified first.	Thank you and noted.
38.		Josue Ruiz Ramirez	This is good practice because 2019 COP is more prescriptive in terms of Due Diligence.	Thank you and noted.

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39.		Marguet, Robin Gambhir, Charlene Nemson, Gianluca Pegoraro, Matthew Klahn, Natalia Uribe, MKS PAMP	Agreed.	Thank you and noted
40.		Joshua Wendler	Not Opposed	Thank you and noted.
41.		Kenna McCall	This will mean nothing if the definitions are weakened. What is the point?	This consultation is seeking stakeholder feedback on definitions such as the eligible CoC material, including the definition of recycled. Changes to the CoC are subject to the consultation, and feedback on this is essential. We welcome stakeholder thoughts and input on the revision of the definition.
42.		Ambar Valles	Agreed, Members wishing to be certified to the revised Chain of Custody Standard must be certified to the 2019 Code of Practices Standard first.	Thank you and noted.
43.		Francesc Picanyol	In my opinion separating COP and CoC is a mistake because you are hindering access to CoC. I understand CoP and CoC as one single goal. If you want to establish two different steps in order to show a progress, it would be better to put together CoP and CoC and just establish two different categories (progress) of the same standard.	The CoC is currently a purely voluntary initiative covering a different scope of requirements, and it is not currently the objective of the RJC to set an objective for all Members to become certified to the CoC as part of their membership. It is for this reason that the CoC is published as a separate standard, but we are trying to ensure that this continues from the COP and does not have duplicated requirements.

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44.		Patrick Schein	I recommend a disconnection as CoC certifies a product and a supply chain and CoP certifies an organisation and practices. One should be able to chose one or another or both.	This is, effectively, the current position. Certification to the CoC standard is voluntary meaning that Members can choose whether to be certified to this Standard. However, it is a fundamental requirement of RJC Membership that Members be certified to the COP within 2 years of joining. This ensures that organisations can be assured that they are joining an organisation where Members are meeting a base-line of responsible business practices.
45.		United Precious Metal Refining, Inc. - Michael A. Mikolay	I would agree. The RJC - CoP is the first set of standards one must be a part of before an entity can move along to more significant steps such as the CoC. It would be an embarrassment to the RJC (and the industry) that someone was granted the ability to supply "pedigreed" metals into the industry, but did not meet what I would consider the basic framework criteria required.	Thank you and noted.
46.		RMI	Given that there is a proposal to remove provision 1 from COC, yes RJC COP 2019 should be conditional for auditee before they can undertake revised COC so that OECD DDG requirements are covered	Thank you and noted.
47.		Rodolfo Orozco	According to our experience, the certification process for the 2019 Code of Practice Standard had the collateral benefit of meeting the requirements for certification under the 2017 Chain of Custody Standard. As such, the RJC proposal does not involve any additional changes to our behaviours and processes. However, from the wording of the question, we believe that the RJC proposal now points to the Code of Practice	The proposal would still allow members to undertake the two audits simultaneously, but does require the 2019 COP to be applied.

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			certification being an exclusive pre-requisite for the member to obtain Chain of Custody Standard certification. Minera Yanaquihua considers that it is more convenient for a new member to be certified simultaneously under the Code of Practice standards.	
48.		UFBJOP	Consensus that certification to COP 2019 should be a prerequisite	Thank you and noted.
Given that the COP 2019 Standard already includes requirements for Human Rights Due Diligence and Due Diligence on Sourcing from Conflict Affected Areas (CAHRAs), RJC is proposing to remove this provision (CoC 1) from the CoC Standard as it would be a duplication.				
49.	Previously CoC 1 & CoC 2	Ambar Valles, Aarón Pita, Charlene Nemson, Matthew Klahn, Marguet, Olivier Demierre - MKS PAMP, (multiple stakeholders)	Agree that removing the duplication is necessary.	Thank you and noted.
50.	Previously CoC 1	Gianluca Pegoraro	Agree.	Thank you and noted.
51.	Previously CoC 1 & CoC 2		The COP RJC Code of Practices (COP) standard is audited once every 3 years without surveillance audits. If we remove the provisions that you suggest to remove, those key requirements will be less controlled unless you ask to be in	Members certified to the COP are subject to mid-term review (either desk-top or on-site) as defined in the RJC assessment manual. Experience from mid-term reviews and recertifications has not identified new findings in relation to the

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			compliance with OECD COP 7 due diligence requirements and COP 12 KYC in a more explicit manner in all CoC provisions especially int the new provisions 1.1 and 1.6.	due diligence and KYC provisions where Members were found to have implemented sufficient controls in the initial audit. RJC are continuously reviewing our procedures and looking for ways to strengthen our standards as part of the usual standard development process and the elements to be verified during surveillance visits will be updated in the assessment manual, taking due consideration of the length of time since the previous COP visit.
52.	Previously CoC 1 & CoC 2	RMI	While we understand the purpose of removing CoC 1 and KYC to avoid duplication and aligning requirements with COP chapter 7, this will impact current RMI cross-recognition agreement with RJC which currently recognizes both CoC and COP.	We would be happy to discuss these concerns further, as there is no change to the requirements Members have to meet as CoC certified companies must already be certified to the COP.
53.	Previously CoC 1 & CoC 2		Yes, in my opinion it is a duplication. Furthermore, this has caused a lot of uncertainty in the precious metals sector.	Thank you and noted.
54.	Previously CoC 1 & CoC 2	Josue Ruiz Ramirez	Agree that due diligence section was removed as it use to be conflicting in previous audits.	Thank you and noted.
55.	Previously CoC 1 & CoC 2		It should not be an issue to prove something as important as due diligence in both the COP and the CoC process	Thank you. The suggestion to remove CoC 1 & 2 would be to remove the duplication in the two standards and ultimately in the audit process. Due diligence and KYC are essential parts of responsible business conduct, which is why it is mandatory for RJC members to conduct as part of the COP. All CoC members are also required to implement the COP and are audited against these requirements.

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56.		Robin Gambhir	RJC should continue to refer to OECD guidance because RJC cannot be trusted to not water down its own standards (as evidenced by the proposed changes).	Thank you. The suggestion to remove CoC 1 & 2 would be to remove the duplication in the two standards and ultimately in the audit process. Due diligence and KYC are essential parts of responsible business conduct, which is why it is mandatory for RJC members to conduct as part of the COP. All CoC members are also required to implement the COP and are audited against these requirements.
57.		Shaya Durbin	This is an important issue. Duplication seems appropriate.	Thank you. The suggestion to remove CoC 1 & 2 would be to remove the duplication in the two standards and ultimately in the audit process. Due diligence and KYC are essential parts of responsible business conduct, which is why it is mandatory for RJC members to conduct as part of the COP. All CoC members are also required to implement the COP and are audited against these requirements.
58.	Previously CoC 1 & CoC 2	Natalia Uribe	We value the idea of reducing the duplication of provisions 1.1, 1.2, 1.3, 2.1, with the CoP Standard. For instance, the KYC provision, but it may be appropriate to refer to the CoP provision within the CoC.	Thank you for the suggestion. We will look at the best place to include this reference and will ensure that this is fully covered in the Standards Guidance.
59.	Previously CoC 1	Jon Ellermann	Yes, although check the requirements for risk treatment/mitigation.	Thank you for the suggestion. We will look at how best to include this, possibly through additions to the Assessment Manual.
60.	Previously CoC 1	Patrick SCHEIN	It is not a duplication as at the CoP level one makes sure that it is compliant at a macro level when with CoC one should check each individual sourcing. Regarding OECD DDG, specialized certifications should be sufficient to comply (ex RMI)	Both the COP and COC require companies to conduct due diligence & KYC on suppliers, with the audit checking to ensure this is being conducted to the level that is required by the RJC standards.

No.	CoC Provision/ Topic	Name	Comment	Response
				In relation to specialized certifications, RJC has a list of standards that have been benchmarked and found to meet the needs of specific provisions within the Standard and in these cases the assessment manual provides guidance on the approach for auditors to take when auditing these elements.
61.	Previously CoC 1 & CoC 2	United Precious Metal Refining, Inc. - Michael A. Mikolay	I would agree that this is a duplication. This goes along with my belief that one must take the first steps (CoP) before moving ahead to the Chain of Custody approval.	Thank you and noted.
62.	Previously CoC 1		There is scope for the CoC 1 provision to reinforce relevant aspects of the COP 2019. Reinforcing such salient points, particularly given global developments is not necessarily duplicative.	Thank you for the comment. We will look at way of reinforcing such verification.
63.	Previously CoC 1 & CoC 2	RMI	This change is understandable but will impact RMI and RJC cross recognition. That said, as long as requirements that are being removed from CoC are fully covered in COP 2019, there are no concerns, but if anything may be missing a revision to COP 2019 may be needed.	We would be happy to discuss this further to provide reassurance, as there is no change to the requirements Members have to meet as COC certified companies must already be certified to the COP.
64.	Previously CoC 1 & CoC 2	Rodolfo Orozco	We believe that the elimination of the requirement should only be allowed for members who are certified under the CoP standard. This will allow recertification audits to be more streamlined without redundancies.	Yes, this is the intention of the change.
65.	Previously CoC 2	Jon Ellermann	Yes, as long as it's clear that following the standard is required.	Thank you and noted.

No.	CoC Provision/ Topic	Name	Comment	Response
66.	Previously CoC1	UFBJOP	Consensus among members that the requirement in the CoC standard can be removed as it is included in the COP	Thank you and noted.
Given that the COP 2019 Standard already includes requirements for Know Your Counterparty (KYC). RJC is proposing to remove this provisions (CoC 2) from the CoC Standard as it would be a duplication.				
67.	Previously CoC 2		Agree with this approach.	Thank you and noted.
68.	Previously CoC 2		There is scope for the CoC 2 provision to reinforce relevant aspects in the COP 2019. Reinforcing such salient points, particularly given global developments is not necessarily duplicative.	Thank you for the comment. We will look at way of reinforcing such verification.
69.	Previously CoC 2	Josue Ruiz Ramirez	It is ok, but KYC requirements are still included in the new section named Eligible Investment Material	Thank you for raising this. Indeed for eligible investment materials enhanced Due Diligence is required and has been specifically called out for this reason.
70.	Previously CoC 2	Gianluca Pegoraro	Would be great to define the area of origin of the material	The RJC Chain-of-Custody (CoC) Standard defines an approach for companies to handle and trade gold, silver and platinum group metals in a way that is traceable and responsibly sourced. Therefore, our focus is on company management practices which help them to maintain traceability and segregation within their operations, which ultimately throughout the CoC the supply chain. We don't require members to disclose origin publicly, however members can ask for this from suppliers. Any public disclosure of provenance would fall under COP 14 Provenance claims. Your comment has been noted and while this is not a focus of the current review, it will be considered for future iterations.
71.	Previously CoC 2	UFBJOP	Consensus among members that the requirement in the CoC standard can be removed as it is included in the COP	Thank you and noted.

No.	CoC Provision/ Topic	Name	Comment	Response
The RJC is seeking stakeholder input on the use of blockchain, or other traceability software solutions being used by Members. Any comments on how such systems may be used in relation to the eligible materials and the level of controls that would be expected?				
72.		Grant Crosse	Would be interested to see what technologies are being explored by the RJC. Many companies getting into the space and finding compatible ones would be interesting. It would be important to ensure anyone collecting data for blockchain ensure this aligns with RJC requirements, or even data the RJC already collects themselves.	Thank you for your input. We are currently seeking to understand stakeholder expectations around blockchain to develop support in the future. We will include this suggestion in future workstreams and reviews of the CoC Guidance.
73.		Tania Pelsler	One of the controls could be the CoC certificate that goes with the jewellery - that can be part of the blockchain.	Thank you for your input.
74.		Jim Kuipers	Excel spreadsheets are largely used for tracking currently. Looking at other guidance out there, its starting to tell people to move away from this and towards more sophisticated and secure tools. The technology and providers of blockchain and traceability are there. But this is a good step, it is inevitable this guidance will be need, we just need to come together and find the right solution.	Thank you for your input.
75.		Rebecca Burton	Is it a question of should blockchain be allowed in addition to other systems, or is it that if blockchain is used, how do you ensure its credible?	The latter. It is important to define what controls need to be used, rather than indicating or requiring specific systems/brands to be used.
76.		Olivier Demierre	Worth having further discussion on this topic. Important to align with other organisations such as LBMA if they have anything on this. Also think this should not be part of the standard but rather external advice.	RJC looks to ensure the standard and guidance is aligned with the industry best practice, which means collaborating and where necessary harmonising with other standards and initiatives. This would likely be part of the guidance.
77.		Natalia Uribe ARM	From the perspective of traceability of ASM. This can't be mandatory. Yes, it is one of the solutions for traceability but we need synchronise with LBMA or RMI. Keep it out of the	It is not being suggested that this would be mandatory. RJC looks to ensure the standard and guidance is aligned with the industry best practice, which means collaborating and where



No.	CoC Provision/ Topic	Name	Comment	Response
			standard but in the guidance e.g. What is the minimum expectation of industry standards for those using blockchain.	necessary harmonising with other standards and initiatives. This would likely be part of the guidance.
78.		Paolo Gazza	In the CoC guidance we have a lot of examples of the efforts members should have in terms of ERP systems and things around traceability. Can there be examples on that type of blockchain can be preferred and types of traceability software? As blockchain is quite complex. When it comes to provenance claims RJC has a lot of support on this. Should be a definition and support available in the same way for blockchain.	Thank you for the comment – we will look at incorporating more into the Guidance.
79.			Simply speaking, inclusion of blockchain or other traceability software would greatly improve systems and transparency as such.	It is not being suggested that this will become mandatory but we will be seeking to including recommendations into the Guidance.
80.		Marguet	System must be base on certificate delivery and registry, no more system	There is no plan to require any particular system. We are looking to understand what stakeholder expectations are around blockchain.
81.		Josue Ruiz Ramirez	System should be able to provide minimum level of information including for example weight and type of material, date material was received, name of supplier, etc.	Thank you for your comment.
82.			Current blockchain systems are still new and should not be solely relied upon yet	Thank you for your comment. The RJC is not suggesting the use of blockchain or recommending any particular system or approach, but rather we are looking to provide guidance on necessary controls to Members who are asking for support and information on necessary controls.
83.		Robin Gambhir	Blockchain is a technology and it is not traceability software. It is simply a database. So the very question betrays RJC's lack of understanding about how this stuff works. That aside,	Thank you for your comment. The RJC is not suggesting the use of blockchain or recommending any particular system or approach, but rather we are looking to provide guidance on

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			it's doesn't matter what technology you use to store the data as long as you collect the data to meet the standard and the claims you make are independently audited. The technology does not make lies true--but this industry likes to present these technology solutions as absolutes in order to garner (sometimes ill-deserved) consumer confidence.	necessary controls to Members who are asking for support and information on necessary controls.
84.		Charlène NEMSON	Same level of controls as for any ERP system currently used by certified entities	Thank you for your comment. This will be included in the consideration for additional guidance.
85.		Sharon Zimmerman	On this front, how well does the blockchain meet environmental sustainability goals? My loose understanding is that blockchain technology generates much more energy usage than any standard tracking and UPC systems. What is the plan to measure and mitigate the extra energy usage?	This is an interesting point to be assessed and discussed alongside the other guidance that will be provided.
86.		Kenna McCall	Again, this is eroding the credibility and trust among retailers and customers.	Thank you for your comment. The RJC is not suggesting the use of blockchain or recommending any particular system or approach, but rather we are looking to provide guidance on necessary controls to Members who are asking for support and information on necessary controls.
87.		Gianluca Pegoraro	We are already studying to apply the Blockchain to our traceability, if you study a Blockchain it must be somehow compatible with other solutions. Depending if it will be mandatory you must consider to include it into the certification fee.	Thank you for your comment. It is not being suggested that this will become mandatory but we will be looking at providing guidance on controls in the Guidance.
88.		Matthew Klahn	Not familiar with these solutions but blockchain only as permanent as the servers that hold the data. If the servers go away, there is no way to verify the chain of custody	The long-term availability of the data and the steps required to maintain access are something to be strongly considered for inclusion in the guidance.

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89.		Natalia Uribe	Keep it free.	Thank you for your comment. It is not being suggested that this will become mandatory but we will be looking at providing guidance on controls in the Guidance.
90.		Therese Mørch	Blockchain hallmarks that scans?	Thank you for your suggestion, this has been noted.
91.		Francesc Picanyol	A traceability software is really necessary to ensure materials origin. But, this software should be open source and accessible in all senses. Not a great business for anybody or a sort of privilege for a few.	The RJC is not suggesting the use of blockchain or recommending any particular system or approach, but rather wishes to provide guidance on necessary controls to Members who are asking for support and information on necessary controls.
92.		Aarón Pita	Blockchain technology or other traceability software will make easier the availability of the information provided through the supply chain. Most of the suppliers and subcontractors want to protect their confidential information and business, it means they do not want to provide any information of their own suppliers and subcontractors such as invoices, transaction documents or any other document required to guarantee the chain of custody.	This is an interesting point for consideration.
93.		Jon Ellermann	Yes, as long as they provide value and improve the responsible trade of these minerals.	Thank you for your comment, this has been noted.
94.		Patrick SCHEIN	That is a good point however confidentiality of the information is central.	Thank you for your comment, this has been noted.
95.		Olivier Demierre - MKS PAMP	We recognize that blockchain or traceability solutions can provide additional features and security to the end user. We would recommend that RJC coordinates with LBMA their approach on the matter so that the above features and	RJC looks to ensure the standard and guidance is aligned with the industry best practice, which means collaborating and where necessary harmonising with other standards and initiatives. This would likely be part of the guidance.

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			security are provided in a way that is practical for the whole supply chain.	
96.		Saskia Shutt	The problem with blockchain and traceability is that most often the miners themselves don't have access to the internet or even a computer, to be able to participate in the primary position of the blockchain or traceability software. This means that blockchains and traceability software only tell part of the story and their accuracy is incomplete	It is not being suggested that this would be mandatory as it is not the intention to limit access to the market for small miners. However, it may be a useful tool for some sectors and as such RJC is seeking to provide guidance for the cases where it may be used.
97.		United Precious Metal Refining, Inc. - Michael A. Mikolay	The trouble with blockchain is that it is only as accurate or reliable as the "enterer" of the information or the integrity of each user. I am fearful that somewhere down the road we will find that a user abused the system and some of the material is "questionable". It could be from a member or a third-party vendor.	Potential risks of malpractice will be considered for inclusion in the Guidance.
98.			I support building in technology such as blockchain to enhance traceability. However, suitable safeguards must be in place to govern the collection, use, and management of data for the blockchain or other traceability software.	Thank you for your comment, this emphasises the importance of having guidance on such technologies.
99.		Marianna Smirnova, RMI	While RMI doesn't endorse any particular block chain solution, RMI with industry stakeholder input has produced Block Chain Guidelines for Minerals Industry, which is a public resource and we welcome RJC to refer to me: https://www.responsiblemineralsinitiative.org/minerals-due-diligence/technology/	This is very useful especially as RJC looks to ensure the standard and guidance is aligned with the industry best practice and collaborating and harmonising with other standards and initiatives. We will certainly review this guidance.
100.		Susan Wheeler	Blockchain is a useful tool to see origin, it can be used in ASM sourced goods to trace to the mine, enabling the RJC members to then engage in sourcing from ASM mines who	This is certainly an additional benefit and point to consider for inclusion in the Guidance.

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			have fulfilled CRAFT certification. Therefore opening up the ability to trade with smaller actors in the supply chain.	
101.		Rodolfo Orozco	Minera Yanacuihua considers that the use of blockchain or traceability software should be an optional element for members. This should not lead to any future attempts to impose the use of said programs on RJC members, as not all of them will have the economic and technological resources to make extended use of them.	Thank you for your comment. It is not being suggested that this will become mandatory but we will be looking at providing guidance on controls in the Guidance
102.	Blockchain	UFBJOP	Tools that can help with traceability. It should not be mandatory to use these, but you could specify rules for using these, requirements and control points in the guidance. Potentially you could put forward implementation solutions. ERP can be a solution to digitise the transfer document.	Thank you for your comment, this has been noted.
RJC will update the guidance and supporting documents. Is there any additional support you would like to see?				
103.		Tania Pelser	We are missing an application form for mines – is there a KYC application form for mines?	We have a KYC template for requesting information which is applicable for all supply chain points. You can find this on our toolkit & template page .
104.			What is the RJC guidance for sourcing from ASM? I know some amendments include recommendation on sharing information on mine of origin for mined gold. The artisanal sector is hard to say the where the location is for the mine source.	RJC provides guidance around sourcing from ASM in both our COP and CoC Standards & guidance documents. You can find more detailed information on this in the guidance documents for both standards on our website .
105.		IRMA	From a comparability perspective with the IRMA standard, the guidance seems fine.	Thanks and noted.
106.	CoC 3	Olivier Demierre	Important we define what outsourced contractors mean – what the scope is.	According to the RJC CoC guidance ‘An outsourcing contractor is an individual, company or other business that takes custody of material to process or manufacture it for another entity’.

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				We will incorporate further guidance into the final version around this.
107.		Natalia Uribe	<p>Use and recognize the Fairmined audits results from the mines for the certified material during RJC CoC audits of the members. This action will facilitate interoperability between standards organizations, more transparency and use of the evidence, which may be translated to make the audits easier for companies engaged in both sustainable minerals' schemes.</p> <p>Last year, ARM presented the detailed toolkit to RJC to explain how Fairmined certification supports RJC Chain of Custody COC Standard (2017) provisions 1. Due Diligence, 2. Know Your Counterparty (KYC), 3. Management systems and responsibilities, 4. Internal material control 5. Outsourcing contractors and service companies, 6. Eligible Mined Material, 9. Eligible material Declaration, 10. COC Transfer Documents and 11. Product claims and Intellectual Property. We can share this analysis again for this suggestion.</p>	<p>ASM is currently eligible COC material under the mined material category, specifically Fairmined and Fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.</p> <p>RJC currently recognise Fairmined material as eligible mined material under the COC. In reference to your proposal to send RJC a toolkit on Fairmined gold, we welcome you to send this for us to consider. RJC looks to harmonise and align with existing industry standards where possible and relevant.</p>
108.		Francesc Picanyol	Of course you will need to update the RJC Guidance specially simplifying it.	RJC will aim to make the guidance as accessible as possible. If you have specific concerns about parts of the Guidance you feel are too complex please do let us know.
109.		Aarón Pita	Inspections of the transaction documents by a third party	Could you please provide further input on the area where you believe that further guidance is required.
110.	CoC 5	Will Nevins-Alderfer	1. Narrowing down the definition of the "recycled gold"	The general feedback from this first consultation has been to not expand the definition of eligible recycled material and this is, therefore, not being taken forward to the next version of the



No.	CoC Provision/ Topic	Name	Comment	Response
			<p>The provision 7.1 of the consultation Standard draft is proposing to expand the definition of eligible recycled material. The expansion are the items b and d.:</p> <p>a. High-value gold, silver or PGM: scrap and waste precious metals from the jewellery and manufacturing process, or post-consumer precious metal products, such as jewellery and ornaments.</p> <p>b. Bullion and investment products that have been reprocessed to a customer or industry standard. This does not include investment products.</p> <p>c. Industrial gold, silver or PGM: waste electrical and electronic equipment, or industrial components such as spent catalysts and fuel cells.</p> <p>d. By-product from the mining of other ore(s) which have undergone further refining or processing to extract eligible material.</p> <p>2. Expanding the scope of mined material to include legitimate all ASM sources and encouraging the recognition by the RJC of legitimate and transparent ASM assurance schemes</p> <p>RJC Code of Practices provision 8.1.b encourages RJC members that source minerals directly from ASM producers to “use best endeavours to positively influence practices by working to:</p> <p>1. Reduce or avoid risks and provide for, or co-operate in, remedying adverse human rights and environmental</p>	<p>draft. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>No change has been proposed to this draft of the Standard. RJC will look to review the inclusion of legitimate ASM as part of a separate workstream in order to ensure this can be done accurately, credibly and inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p> <p>ASM is currently eligible CoC material under the mined material category - More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support.</p> <p>RJC also look to align with other industry standards where possible, and we welcome suggestions to add to the existing list of standards we harmonise with.</p>

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			<p>impacts. Measurable risk mitigation should aim to promote significant improvement within a defined period from the adoption of the risk management plan.</p> <p>2. Support development opportunities for ASM communities</p> <p>3. Actively participate in initiatives, including multi-stakeholder ones, that enable the professionalisation, formalisation and/or certification of ASM, as appropriate to the situation. iv. Seek to understand fair commercial terms and offer these to all ASM suppliers.”</p> <p>However, the current RJC Chain of Custody Standard provision 6.1, limits in practice the possibilities of the members’ engagement with the ASM, by only including three options in the existing standard:</p> <p>“c. Mines or producers certified under an RJC-recognised responsible ASM standard, with documented due diligence that confirms that the material comes from such mines or producers.</p> <p>b. Artisanal and small-scale mining (ASM) producers operating on the entity’s mining concessions that have participated in initiatives to professionalise and formalise ASM and with documented due diligence confirming that the material comes from such ASM producers and not from illegitimate sources”.</p> <p>d. Mines that are subject to an RJC-accepted responsible mining assurance scheme and validated to conform with the RJC COP requirements as defined in provision 6.2”.</p>	

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			<p>The first option, the certified ASM-mined products are a great, safe and easy choice to include ASM in the RJC supply chains, representing best practices in terms of performance and assurance and a leadership vision of the potential of the ASM sector. Their recognition as eligible CoC material is an important statement of the industry striving towards best practices in the long term. It is also the only option for RJC members to source directly from ASM miners. However, given the current state of the ASM sector level of formalization and ESG performance, it is important for RJC members to open opportunities for engagement with ASM at earlier stages of development.</p> <p>The second option also has its limits: while integrating ASM gold into the supply chain of an industrial mine or a processing facility with the function of aggregator, can provide win-win opportunities, it is important to consider that it is not always a viable or desired option for ASM communities as it may not always represent a real economic benefit or added value for miners. Other opportunities for ASM integration into the RJC CoC should therefore be also considered.</p> <p>Finally, the third option is also limiting for the ASM communities, as the current RJC-validated schemes listed in the Chain of Custody Guidance (2019) are the Mining Association of Canada's Towards Sustainable Mining (TSM) program</p>	
111.		Patrick SCHEIN	Access of ASM to the CoC is complicated. As an ARM board member I strongly recommend to adopt the suggestions of change and evolution they submitted to you. available here:	No change has been proposed to this draft of the Standard on the expansion to legitimate ASM. RJC will look to review the inclusion of legitimate ASM as part of a separate workstream



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			<p>https://www.responsiblemines.org/wp-content/uploads/2022/12/Key-messages-RJC-CoC-Inclusion-of-the-ASM-sector.pdf</p> <p>Main point on my side is the access of ASM through LSM or other treatment plants. There is a central point which is the economic distribution and costs charged to the ASM miners. Some plants or LSM charge as much as 50% to the ASM which are quite captive as they wether mine the LSM concession or lacks competition to sell their concentrates.</p>	<p>in order to ensure this can be done accurately, credibly and inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p> <p>ASM is currently eligible CoC material under the mined material category, specifically Fairmined and Fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support.</p>
112.		United Precious Metal Refining, Inc. - Michael A. Mikolay	The fact that entities who are not CoC certified cannot make the claim if about CoC if they are not certified themselves is a point not well know. It should be made clear to all members.	We will ensure that this is reiterated and explained clearly in the Guidance.
113.			More credible efforts should be made to factor in the ASM context. This is an integral part of the sector and it can not simply be ignored.	ASM is currently eligible CoC material under the mined material category, specifically Fairmined and Fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.

No.	CoC Provision/ Topic	Name	Comment	Response
				RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support.
114.		Ambar Valles	there may be some feedback that would not go in the revised standard but in the guidance document instead.	All feedback will be reviewed and, where appropriate, may be included in the Guidance.
The new draft CoC Standard continues to allow risk-based approach to whether outsourced contractors have to be audited. The RJC is seeking stakeholder input on whether this approach is sufficiently robust. Please provide any thoughts on activities that should be considered High Risk.				
115.	CoC 3	Kinjal Shah	When you say outsourced - does it also mean outsourced findings from external agencies?	If there are small parts of jewellery, brought in, and they may or may not be CoC. Depending on the proportion of the product you have to list what is and is not CoC on the declarations. Outsourced contractors tend to be those working on the main piece rather than the brought in elements. As these are not always available in CoC form.
116.	CoC 3	Paolo Gazza	Agree that outsourced contractors do have to be audited for CoC. End of day CoC is voluntary and is an added value for those seeking certification.	This would be a departure from the current CoC which takes a risk-based approach to deciding which outsourced contractors have to undergo 3 rd party audit. It is not proposed to revert to 100% 3 rd party audit of outsourced contractors at this stage as the cost to Members can be disproportionate.
117.	CoC 3	Emma Wilson	Agree the risk-based approach is the right way to approach the outsourced contractors. We get feedback from members if they think we are selecting too many contractors to visit. The table could do with more detail - the examples are good, but we often find grey areas or items that are not as clearly covered as they could be. Occasionally, we have had to approach the RJC on a case-by-case basis on what would be	This will be reviewed and further guidance may be added to the Assessment manual.

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			medium or high. Don't want an exhaustive list, but currently there is not enough detail. And having something we can clearly refer to reason black and white why we are picking the contractors it would be very useful.	
118.	CoC 3		Risk-based approach is sufficiently robust in certain jurisdictions, where additional governments controls (see EU 2017/821) are in place.	This regulation will be reviewed and considered for reference in the Guidance.
119.	CoC 3	Alexander	This is sufficient.	Thank you, and noted.
120.	CoC 3	Marguet	Entities without complete clean list of invest and or owner of the society	It is not clear how the ownership would impact on the risks to segregation or traceability. Perhaps you could clarify further? This may apply more the COP due diligence requirements.
121.	CoC 3	Josue Ruiz Ramirez	Risk-based approach are the right type of audits.	Thank you, and noted
122.	CoC 3		Not sufficiently robust	The comment is noted. It would be useful to have specific areas of feedback concern to be able to include these concerns in the review.
123.	CoC 3	Robin Gambhir	It depends upon what the penalties are for being wrong. If your outsource partner ends up being found at as a forced labour workplace and you've been certified by RJC with that partner as part of the your supply chain, then what happens to you? And how does that look to RJC. The question is really about repetitional risk.	<p>Issues around forced labour are addressed in the COP (and currently the CoC). Members are required to conduct due diligence on their suppliers, at which point members should be identifying any risks or red flags. This is checked by the auditor at the RJC audit.</p> <p>If there is a complaint or grievance, the RJC investigates this by checking member due diligence efforts, identified risks and the audits. Depending on the findings RJC will take further steps to assess the members compliance as per the grievance raised.</p>



No.	CoC Provision/ Topic	Name	Comment	Response
124.	CoC 3	Charlène NEMSON	Outsourced contractors should be part of the audit perimeter. If a certified entity has many outsourced contractors each processing a small % of its eligible materials, then none would be audited following a risk-based approach...	The risk-based approach is not based on percentage of business but on the nature of work being undertaken with higher risks assigned to activities where there is a higher risk of inclusion of non-COC material. Therefore, in the example given if the outsourced contractors are transforming the product with activities that are deemed to incur such risks they would all still need to be audited even if the business level is low.
125.	CoC 3	Ambar Valles	Risk-based approach is robust and mirrors the approach of other industry standards' requirements. As part of COP 7, the Member would be required to identify high-risk actors in its supply chain. As an auditor, I would expect contractors to be included in the COP 7 risk assessment and if it is determined they operate in a CAHRA or they are considered high-risk for other reasons then it would be expected that the contractor is treated as high-risk during the CoC audit (i.e. Member is conducting onsite visits, CoC expectations are communicated and followed, if any breaches are found risk mitigation plan must be implemented, etc).	For CoC, the risk-based approach is based on risks to the segregation and traceability of CoC materials and not to geographic or other consideration.
126.		Francesc Picanyol	any part of the chain should be audited.	This would be a departure from the current CoC which takes a risk-based approach to deciding which outsourced contractors have to undergo 3 rd party audit. It is not proposed to revert to 100% 3 rd party audit of outsourced contractors at this stage as the cost to Members can be disproportionate.
127.	CoC 3	Olivier Demierre - MKS PAMP	We are fine with a risk-based approach. RJC's High risk considerations should be aligned with LBMA.	RJC looks to ensure the standard and guidance is aligned with the industry best practice and will ensure that the risk considerations are handled in the same way.



No.	CoC Provision/ Topic	Name	Comment	Response
128.	CoC 3	Saskia Shutt	The same standards should apply to outsourcing or the chain of traceability is no longer complete.	The current CoC takes a risk-based approach to deciding which outsourced contractors have to undergo 3 rd party audit. It is not proposed to revert to 100% 3 rd party audit of outsourced contractors at this stage as the cost to Members can be disproportionate.
129.	CoC 3	United Precious Metal Refining, Inc. - Michael A. Mikolay	Third party contractors should be audited. The issue seems to be that there are not enough auditors to complete the process in a reasonable period of time.	The decision to have a risk-based approach was not taken based on availability of auditors, but on ensuring that the cost-benefit of audits is proportionate to the risks to the chain of custody.
130.	CoC 3	Susan Wheeler	All outsourced contractors should be audited. There is no determination of risk without the due diligence of an audit.	This would be a departure from the current CoC which takes a risk-based approach to deciding which outsourced contractors have to undergo 3 rd party audit. It is not proposed to revert to 100% 3 rd party audit of outsourced contractors at this stage as the cost to Members can be disproportionate.
131.	CoC 3		We believe that any control over the subcontracted member should come solely from the RJC member. Audits for subcontracted contractors imply a level of control over the contractor from a NGO with which they do not necessarily wish to establish links. This could be seen as an unwelcome intrusion that will wear down the relationship that may exist between the RJC member and the contractor.	The CoC has an expectation that Members undertake control and oversight of their contractors. However, a level of oversight by the third party is required to verify that the Member's efforts are sufficiently robust. It is for this reason that the risk-based approach on 3 rd party audits has been included in the Standard as non-compliances found at contractors sites would indicate insufficient controls by the member and require further assessments.
The RJC published supplementary guidance in August 2021 on the verification required for material to be re-incorporated into the CoC pipeline. This has now been incorporated into the revised Standard. Any comments?				

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132.		Olivier Demierre	This makes sense.	Thank you and noted.
133.			It would theoretically be fine to add CoC finished product back into the CoC chain, but only if you can effectively track the product.	RJC is proposing that any such product would need to be identifiable and traceable to CoC material in order to be accepted for re-entry.
134.	CoC 11.2	Richemont	Photographic evidence: cannot be systematic (impossible to take a photo of every product – furthermore, for one given product, many photos should be necessary to view all sides of the product) => to be removed from the standard, but to be added as an example of evidence in the guidance	There does need to be something apart from documentary records that matches what was sent out to the item/items returned. RJC are proposing making photographic evidence non-exclusive by adding other visual means of identification: “f: Visual identification, including drawings, photographs, markings etc.”
135.		Alexander	Es perfec	Thank you and noted.
136.	CoC 11	Robin Gambhir	If this refers to 11.1 and 11.2, these seem to be reasonable changes.	Thank you and noted.
137.		Olivier Demierre - MKS PAMP	We consider this addition helpful.	Thank you and noted.
138.		Rodolfo Orozco	The guideline published is useful as it covers a scenario in which a member could be left at a loss on how to proceed while complying to RJC standards	Thank you and noted.
139.		Marguet	in case of return the customer must send part with tracability transfert document	This is specified in 11.3.
140.		Sharon Zimmerman	Define returns - returns of finished goods like rings and necklaces? Or returns of unused materials like sheet and wire? This needs further clarification.	Provision 11 covers all forms of the CoC material – the term ‘Material’ is defined in the glossary but this will be revisited to ensure that it is clear.

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141.		Francesc Picanyol	not foreseeing this circumstances would be consenting a hole in the pipeline.	Thank you and noted.
142.		Olivier Demierre - MKS PAMP	We consider this addition helpful.	Thank you and noted.
143.		United Precious Metal Refining, INC. - Michael A. Mikolay	The CoC internal "pipeline" should be like the Comex/Nymex is. Secure within its own members.	Thank you and noted.
144.		Rodolfo Orozco	The guideline published is useful as it covers a scenario in which a member could be left at a loss on how to proceed while complying to RJC standards	Thank you and noted.
The RJC is considering expansion of the scope of materials to include investment material (metals only) and the proposed requirements. Do you believe the inclusion of material from this source would create any risks either to the RJC or the industry as a whole? Any comments welcome.				
145.	CoC 7	Kinjal Shah	I get this query from refiners. If they have old silver coins no longer in currency, CoC standard doesn't allow to use this as CoC. From my point of view its ideal to include.	Coins will remain out of scope following stakeholder input and due to the complexity in establishing legal use of these and their origin.
146.	CoC 7	Tania Pelsler	Part of investment is currency coins such as maple leaf which is a legal tender in the country (e.g. Canada). If it's sold in another country, can we include it in that in as investment material because it's still legal tender in Canada?	Coins will remain out of scope following stakeholder input and due to the complexity in establishing legal use of these and their origin.
147.	CoC 7	Jim Kuipers	RJC objective is to ethically source material. Including investment may make it more challenging to identify where this material comes from.	Enhanced due diligence is being proposed in order to mitigate this risk. Additional input will be requested to ensure that this is sufficient.

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148.	CoC 7	Rebecca Burton	This would add risk. If it is included, and consumers start to ask where the material comes from, and they can't actually identify the source, this creates risk. You won't be able to say it did/did not source from conflict area as due diligence and traceability is harder to conduct on investment materials.	Enhanced due diligence is being proposed in order to mitigate this risk. Additional input will be requested to ensure that this is sufficient.
149.	CoC 7	Olivier Demierre	<p>What are we planning to include under this meaning 'investment', and how to we handle mixed metals/content - e.g. mixed jewellery, bullion, coins etc? It doesn't make sense to separate things one by one and conclude if its investment or not.</p> <p>Recent conversations show potential confusion on what is included currently under recycled. Need more clarity to the end user.</p> <p>One point to consider is that the more pressure on refiners to segregate between different sources, the more costs must be reflected downstream from them. If they must pick, assess, conclude, document, on a piece-by-piece basis, that will have consequences. Too much complexity will create a bigger cost. At the end of the day, we are here to provide what the end user needs. More clarity means we can handle their risk management better.</p>	The additional complexity has been duly noted. Inclusion of such material would not be mandatory so it would be up to individual members whether they wish to use such sources and can manage the additional complexity. It should be noted that it has been decided that coins will remain out of scope.
150.	CoC 7	Natalia Uribe (ARM)	Expanding to investment has different risks. There are different kinds of sources in this, so risks increase. Checking the amendments RJC are proposing, there are ways that you are trying to strengthen the due diligence practices in the	ASM is currently eligible CoC material under the mined material category, specifically Fairmined and fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to

No.	CoC Provision/ Topic	Name	Comment	Response
			<p>new products. We also know the market and the companies see RJC as the ethical source and some see this also as associated with recycled. May be unintended negative consequences - expanding definition when many companies are taking the option to recycled, may increase impact on the ASM sector. E.g. accessing formal markets will become more challenging without RJC support.</p> <p>When checking how many mentions are in the CoC amendments on ASM and there is just 1 - when talking about possible eligible material. If RJC want to promote the connection with ASM, we need more clear provisions and emphasise the connection with the sector and ASM – whether its sourcing, impact projects or other. Not saying companies need to source ASM but should make a contribution in some way. Otherwise, members will only source from recycled and not contribute to the ASM sector.</p>	<p>the transfer document to be more specific to ASM. Additional information can also be added to the guidance. RJC also provides guidance around sourcing from ASM in multiple provisions throughout both our COP and CoC Standards & guidance documents. You can find more detailed information on this in the guidance documents for both standards on our website.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support</p>
151.	CoC 7	Robin Gambhir	<p>Well, the proposed changes would permit these materials to be considered 'recycled' which is misleading at best. Consumers see that term and they believe that the metal had, at one point, been part of a consumer product (either post-consumer or pre-consumer) that was from the jewellery industry or electronics etc.</p> <p>You could make a claim and disclose the origin as being investment material, but calling it recycled is wrong. But, upon mature thought, you couldn't even make that claim because your weakened CoC standard allows materials to be</p>	<p>Thank you for your feedback – your comment has been noted towards the recycled definition.</p> <p>Any specific feedback on concerns regarding risk areas for mixing of materials in a CoC facility are welcome, so these can be taken into consideration.</p>

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			mixed within a facility and so you then lose the ability to make a true origin claim.	
152.	CoC 7 & CoC 8	Charlène NEMSON	<p>"The distinction between ""grandfathered"" investment material and actual objects that had an actual use - industrial or end-consumer-relevant - as opposed to the storage of value must be kept extremely clear and easy to explain even for retailers.</p> <p>The recycled material category SHOULD NOT include bullions. It completely dilute the recycling concept as understood by end-consumers and make it way too easy to create CoC gold from any kind of source"</p>	<p>Thank you for your feedback. The definition of investment will be made clear as to what constitutes investment.</p> <p>Your comment has been noted towards the recycled definition.</p>
153.		Gianluca Pegoraro	Iridium and Ruthenium should be included	RJC is not currently looking to expand the scope of materials applicable to the CoC standard. However, your comment has been noted, and will be taken into consideration for future reviews.
154.		Matthew Klahn	If these materials could be returned to use in non-investment areas such as manufacturing then this seems like a good idea.	Thank you and noted.
155.		Ambar Valles	The updated provision in the CoC draft states that it covers commercial supplier due diligence which I believe would be applied to pawn shops and investment material that a customer may sell to them. I think there should be extra scrutiny that refiners may need to do to ensure this type of supplier and investment material is not associated with OECD/industry risks.	This will be further reviewed to strengthen requirements for refiners.
156.		Francesc Picanyol	CoC should be a closed chain including all circulating precious metals, otherwise it will be a leaky pipeline.	At this moment, the scope of the RJC in the watch and jewellery industry is to cover the following precious metals:

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				gold, silver and platinum group metals. RJC is not currently looking to expand the scope of materials applicable to the CoC standard. However, your comment has been noted, and will be taken into consideration for future reviews.
157.		Jon Ellermann	Need to understand which metals.	The CoC currently applies only to gold, silver, platinum, palladium and rhodium.
158.		Patrick SCHEIN	Investment material should not be considered as ethical source. Allowing Investment into CoC will make it enter into the ethical world when there is no reason to do so.	This has been raised by a number of stakeholders and will be considered as part of the next round of engagement.
159.		United Precious Metal Refining, INC. - Michael A. Mikolay	Investment bars cease to be investment bars when the material is collected for its return into the metal industry to reclaim its metals value - a downstream intermediate processor.	Thank you for your comment – this has been noted. RJC will ensure the definition of investment material is clear.
160.		Rodolfo Orozco	The proposed definition of investment materials should be explicit regarding what kind of RJC members should be mindful of it during their operations.	If it is decided to proceed with this stage further guidance will be provided.
161.	CoC 7		It might increase risks, but given the overall risk identification requirements, the risk should be manageable.	Thank you and noted.
162.	CoC 7	Josue Ruiz Ramirez	I don't think it represent an additional risk	Thank you and noted.
163.	CoC 7	Robin Gambhir	Yes to both.	Thank you and noted.

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164.	CoC 7	Gianluca Pegoraro	I think we should not mix industrial material and investment material, or maybe only few subjects may be eligible to do this.	This is an interesting point. It would be useful to have further details or examples of where this might apply.
165.	CoC 7	Ambar Valles	Inclusion of investment material is a risk, but most industry standards already include this material.	Thank you and noted.
166.	CoC 7	Patrick SCHEIN	Yes as recycled did.	Thank you and noted.
167.	CoC 7	Toby Pomeroy	I believe investment material's inclusion in the Standard would be damaging to the industry as a whole. These additions will produce unintended negative consequences for the inclusion of the ASM sector. Materials that would have been reprocessed anyway and add little value in terms of positive impact will now be easily labeled as "ethically sourced". These options become unregulated source of gold into the certified recycled option. This would make the so-called "recycled" option even more appealing, since it is easy and relatively inexpensive. We fear that companies may be encouraged to choose "recycling only" sourcing policies, using an environmental argument that does not accurately represent the purported impact. By legitimizing and encouraging such choices, RJC will strengthen the "business as usual" and will jeopardize the engagement of the entire jewelry industry with the ASM sector. Reprocessing gold previously mined in unknown conditions and calling it "responsible" will not reduce the ASM, which will continue to face enormous challenges,	<p>Thank you for your comment – your concerns have been noted and will be considered.</p> <p>RJC will review the requirements and guidance on labelling of materials and use of terms such as "ethically sourced".</p>

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			offering its minerals to the informal markets, and without getting any support, will become even more marginalized.	
168.	CoC 7	Olivier Demierre – MKS PAMP	Such inclusion makes sense provided it is done in a transparent manner	Thank you and noted.
169.	CoC 7	United Precious Metal Refining, Inc. – Michael A. Mikola	One must watch the movement between the mine and the bullion bank. That is an investment bar. The key is the transformation of the bar into a usable consumer commodity.	Thank you and noted.
170.		Rodolfo Orozco	As a mining producer we don't believe the proposed definition of investment material represents an immediate change or risks to its day-to-day operation.	Thank you and noted.
171.	COC 7	UFBJOP	Agree that it could be useful to increase the amount of COC globally, but need to ensure that mined gold cannot be transformed into investment gold very quickly by going through bullion and by-passing mining requirements.	Thank you and noted.
172.	CoC 7	Robin Gambhir	Investment materials are not recycled. Allowing for this will immediately provide easy entry of illegal / conflict gold into investment products initially and later in the jewellery industry itself.	Thank you and noted.
The RJC has added reference to investment materials in the Eligible Material Declarations. The RJC is seeking guidance from stakeholders on whether further changes are required to this provision.				
173.	CoC 7 & CoC 6	Charlène NEMSON	The investment material requirements should be merged with the "grandfathered" requirements, i.e. only make eligible material that originate before a certain date	Thank you for your comment, this has been noted.

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174.		Therese Mørch	Perhaps consider, like Fairmined does, that the caster sign contract to not mix and that jeweller/brand uses own crucible in order to prevent mixing of non traceable metals.	Thank you for your comment. This will need further consultation with the relevant stakeholder groups to evaluate the operational implications.
175.		United Precious Metal Refining, Inc. - Michael A. Mikola	I believe it is sufficient at this time. Worth a "re-think" after implementation.	Thanks and noted.
176.		Rodolfo Orozco	We don't believe the proposed definition is in need of further changes.	Thanks and noted.
Please provide any thoughts and comments on RJC's current definition of recycled materials.				
177.	CoC 5.1	Grant Crosse	We have consumers who only want recycled metals. Platinum that is sourced from a mine directly, then cast into jewellery, as part of the manufacturing it leaves a tree at the end of the process. If the tree is granulated, is that a recycled product or still a primary mining source? Customers want assurance when a product is recycled, so the definition is important.	Full guidance and definition will be provided. The definition of recycled is being further reviewed and RJC is actively engaged with other organisations in the industry to ensure clarity for all parties and especially for consumers. This definition will take into consideration the OECD definition of recycled.
178.	CoC 5	Sara Yood	Is it redundant to include it in the definition - to say it'll begin new lifecycle as gold silver PGM if you're saying this is what recycled is? Maybe don't need entire last clause – everything after 'to begin a new life'.	Thank you, your comment has been noted. The definition of recycled is being further reviewed.
179.	CoC 5	Richemont	Recycled gold: definition should be revised to better stick with the expectation of the public perception of recycled materials and to avoid attacks related to greenwashing.	The definition of recycled is being further reviewed and RJC is actively engaged with other organisations in the industry to ensure clarity for all parties and especially for consumers. This

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			<p>Current definition may be split into 2 or more categories, each having its own criteria for COC eligibility.</p> <p>For due diligence purpose, it would be important to ensure that these categories fall under the scope of recyclable gold as per the OECD Due diligence Guidance</p> <p>Silver and PGM's: to be thought if the definition should also be revised</p>	definition will take into consideration the OECD definition of recycled.
180.	CoC 5.2, 5.3, 5.4, 5.5	Richemont	To be adapted in case of new definition for recycled.	The definition of recycled is being further reviewed and RJC is actively engaged with other organisations in the industry to identify a suitable definition.
181.	CoC 5.1	Therese Mørch	<p>I share the opinions of ARM whose objectives are:</p> <p>* To narrow down the definition of the "recycled gold" so as to avoid the risk of misleading customers regarding the actual ESG impacts of recycling gold that is simply being re-refined.</p> <p>Examples of terms could be re-used or re-purposed precious metals, since often we don't even refine, but smelt down and simply give new use and purpose to the metals.</p> <p>* To expand the scope of mined material to include all legitimate ASM sources and to encourage the recognition by the RJC of legitimate and transparent ASM assurance schemes.</p>	<p>The definition of recycled is being further reviewed and RJC is actively engaged with other organisations in the industry to identify a suitable definition.</p> <p>No change has been proposed to this draft of the Standard on the expansion to legitimate ASM. RJC will look to review this as part of a separate workstream in order to ensure this can be done accurately, credibly and inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p> <p>ASM is currently eligible CoC material under the mined material category, specifically Fairmined and Fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to the transfer document to be more specific to ASM.</p>



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				RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support.
182.	CoC 5	Amber Valles	<p>Eligible Recycled Material Provision 7 (now 5)</p> <p>- Please consider clarification on unrefined ingots. Pawn Shops or jewelry manufacturers often collect scrap across a period of time, then once enough material is collected they melt the collected scrap into an ingot/bar which is then sent to the refiner. If a refiner identifies suppliers with melting capabilities should there be further scrutiny and review to make sure that these ingots/bars are not mixed with mined material or illicit gold? This is hard to review and turn into a requirement, but it could be captured under required enhanced due diligence for refiners or definition of unrefined ingots.</p> <p>Provision 7.1 (now 5.1)</p> <p>- Defining scrap jewelry; in some instances pre-consumer jewelry (i.e. outdated stock in a jewelry store a.k.a "closeout jewelry") is purchased by businesses and sold to refiners as scrap jewelry. Technically this jewelry has not been sold to consumers but may be treated as "waste/scrap".</p> <p>Provision 7.5 (now 5.5)</p>	<p>The definition of recycled is being further reviewed and RJC is actively engaged with other organisations in the industry to identify a suitable definition and to ensure clarity for all parties and especially for consumers</p> <p>If appropriate once this is clarified:</p> <p>Provision 5: Unrefined ingots –further clarification and controls will be defined.</p> <p>Provision 5.1: Scrap jewelry as described here would already be included in the current definition. Further guidance will be provided on enhanced due diligence requirements to verify that such material is actually "scrap".</p> <p>Provision 5.5: Auction houses would not currently be included in scope unless they were prepared to provide traceability on the materials.</p>

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			- This may be a good opportunity to add expected due diligence or guidance on recycled materials sourced from auction houses (slightly different that estate). Often, auctioneers do not disclose any information from the previous owner, and do not provide affidavits that material is post-consumer. Opportunity for Members to create their own sourcing guidelines for auctions such as reviewing company corporate responsibility procedures and the auctioneer's own due diligence on material sold.	
183.	CoC 5.1	Emily Phillippy, Toby Pomeroy, Daniella Samper	<p>RJC Code of Practices provision 8.1.b encourages RJC members that source minerals directly from ASM producers to "use best endeavours to positively influence practices." However, the current RJC Chain of Custody Standard provision 6.1, limits in practice the possibilities of the members' engagement with the ASM, by only including three options in the existing standard:</p> <p>"c. Mines or producers certified under an RJC-recognised responsible ASM standard, with documented due diligence that confirms that the material comes from such mines or producers.</p> <p>b. Artisanal and small-scale mining (ASM) producers operating on the entity's mining concessions that have participated in initiatives to professionalise and formalise ASM and with documented due diligence confirming that the material comes from such ASM producers and not from illegitimate sources".</p>	<p>No change has been proposed to this draft of the Standard on the expansion to legitimate ASM. RJC will look to review the inclusion of legitimate ASM as part of a separate workstream in order to ensure this can be done accurately, credibly and inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support. We will be reaching out once this project is ready.</p>



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			<p>d. Mines that are subject to an RJC-accepted responsible mining assurance scheme and validated to conform with the RJC COP requirements as defined in provision 6.2”.</p> <p>The first option, the certified ASM-mined products are a great, safe and easy choice to include ASM in the RJC supply chains, representing best practices in terms of performance and assurance and a leadership vision of the potential of the ASM sector. Their recognition as eligible CoC material is an important statement of the industry striving towards best practices in the long term. It is also the only option for RJC members to source directly from ASM miners. However, given the current state of the ASM sector level of formalization and ESG performance, it is important for RJC members to open opportunities for engagement with ASM at earlier stages of development.</p> <p>The second option also has its limits: while integrating ASM gold into the supply chain of an industrial mine or a processing facility with the function of aggregator, can provide win-win opportunities, it is important to consider that it is not always a viable or desired option for ASM communities as it may not always represent a real economic benefit or added value for miners. Other opportunities for ASM integration into the RJC CoC should therefore be also considered.</p> <p>Finally, the third option is also limiting for the ASM communities, as the current RJC-validated schemes listed in the Chain of Custody Guidance (2019) are the Mining Association of</p>	

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			<p>Canada's Towards Sustainable Mining (TSM) programme and the International Council on Mining and Metals (ICMM), which are both are for only for large-scale mining, limiting the possibility of the ASM to be part of the RJC eligible mined material.</p> <p>Recommendations:</p> <p>1. To make the RJC standard more inclusive and to better align it with the spirit of the OECD Due Diligence guidance. We propose a new category for eligible materials that could include: "Legitimate ASM , where documented due diligence has been performed as recommended by the OECD, measures are being implemented to mitigate the OECD Annex II risks, and a reliable traceability system is in place".</p> <p>2. In the same RJC Chain of Custody provision 6.1 in the item of eligible mined material "d. Mines that are subject to an RJC-accepted responsible mining assurance scheme and validated to conform with the RJC COP requirements as defined in provision 6.2", we recommend that guidance is provided on how ASM assurance schemes based on legitimate standards, could become recognized as "RJC validated mining assurance schemes".</p>	
184.	CoC 5.1	Argor-Heraeus SA, PMIF	Please find attached our counterproposal to the definition of recycled gold within the CoC scheme. This definition of recycled gold was prepared by the PMIF and its ad hoc	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a

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			working group. I sincerely hope to see it being adopted in the next version of the CoC standard.	suitable definition and to ensure clarity for all parties and especially for consumers.
185.	CoC 5.1	Patrick Schein	<p>This CoC standard is a good achievement and a recognized standards. However, it places wrongly recycled gold has an ethical choice (90%+ of the CoC gold) and does not allow much access to ASM gold to its certified supply chain.</p> <p>We redefined recycled material in a PMIF working group. We recommend RJC to adopt this new definition.</p>	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
186.	CoC 7	Toby Pomeroy	"We call for a re-definition of the concept of "recycled gold", that could be aligned with the definition of the "real recycled" promoted by the Precious Metals Impact Forum (PMIF), where key industry initiatives, refiners, jewelry brands, and NGOs are participating. This redefinition should allow to differentiate gold resulting from a real recycling process from re-refined gold, establishing a narrower approach, more in line with the general perception of recycling i.e. the recovery of gold destined to be discarded. This definition should also prevent artificially created recycled gold."	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
187.	CoC 5.1	Saskia Shutt, Toby Pomeroy, Daniella Samper Mariele Williams, Will Nevins-Alderfer	<p>Narrowing down the definition of "recycled gold"</p> <p>Recommendation:</p> <p>This is why we call for a re-definition of the concept of "recycled gold", that could be aligned with the definition of "real recycled" promoted by the Precious Metals Impact Forum (PMIF), where key industry initiatives, refiners, jewelry brands, and NGOs are participating. This redefinition should allow the differentiation of gold resulting from a real recycling process from re-refined gold, establishing a</p>	<p>Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>No change has been proposed to this draft of the Standard on the expansion to legitimate ASM. RJC will look to review the inclusion of legitimate ASM as part of a separate workstream</p>

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			<p>narrower approach, more in line with the general perception of recycling i.e. the recovery of gold destined to be discarded. This definition should also prevent artificially created recycled gold.</p> <p>1) RECYCLED GOLD – Gold recovered from any product containing less than 2% of gold in weight destined to be discarded, and returned to a refiner or other downstream intermediate processor to begin a new life cycle as “recycled gold”. Freshly mined material, including tailings and any wastes and by-products of mining operations, are excluded from this section.</p> <p>2) REPROCESSED GOLD — Gold produced from any product containing more than 2% of gold in weight with the purpose of changing its state (e.g., bullion melted to create jewelry, jewelry melted to become a bar being sent to a refinery, unsold or used or broken jewelry being melted to create new jewelry or a different type of product, sputtering targets, manufacturing scraps, ...).</p> <p>PMIF will publish the proposal and ARM will update this message, once published.</p> <p>Expanding the scope of mined material to include legitimate all ASM sources and encouraging the recognition by the RJC of legitimate and transparent ASM assurance schemes</p> <p>Recommendations:</p>	<p>in order to ensure this can be done accurately, credibly and inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support.</p>

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			<p>To make the RJC standard more inclusive and to better align it with the spirit of the OECD Due Diligence guidance. We propose a new category for eligible materials that could include: "Legitimate ASM, where documented due diligence has been performed as recommended by the OECD, measures are being implemented to mitigate the OECD Annex II risks, and a reliable traceability system is in place".</p> <p>In the same RJC Chain of Custody provision 6.1 in the item of eligible mined material "d. Mines that are subject to an RJC-accepted responsible mining assurance scheme and validated to conform with the RJC COP requirements as defined in provision 6.2", we recommend that guidance is provided as to how ASM assurance schemes based on legitimate standards, could become recognized as "RJC validated mining assurance schemes".</p>	
188.	CoC 5.1	UPMR	<p>UPMR endorses the changes which are proposed, most particularly with regard to the definition of recycled material. This definition is "in line" with the OECD Due Diligence Guidance defines "Recyclable Gold":</p> <p>OECD Due Diligence Guidance: Recyclable Gold – Gold that has been previously refined, such as end-user, post-consumer and investment gold and gold-bearing products, and scrap and waste metals and materials arising during refining and product manufacturing, which is returned to a refiner or other downstream intermediate processor to begin a new life cycle as "recycled gold". The origin of Recyclable Gold is considered to be the</p>	<p>Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p>

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			<p>point in the gold supply chain where the gold is returned to the refiner or other downstream intermediate processor or recycler.</p> <p>This definition concurs with our belief that gold is “transformed” when converted for future consumer use by the refining process as impurities are removed and assays are likely upgraded to industrial/manufacturing based standards. This “repurposing” of the material ensures that it is to be used in manner consistent with eventual consumer/marketplace usage.</p> <p>UPMR welcomes the opportunity to speak with a RJC representative to elaborate on any points or to continue additional discussion of this subject.</p>	
189.	CoC 5.1		<p>The definition of the “recycled gold” should be amended and tightened in order to avoid misleading customers regarding the ESG impacts of recycling gold that is simply being re-refined.</p> <p>It is essential for the scope of mined material to include all legitimate ASM sources. In addition, the RJC should recognize and integrate legitimate and transparent ASM assurance schemes.</p>	<p>Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>No change has been proposed to this draft of the Standard on the expansion to legitimate ASM. RJC will look to review the inclusion of legitimate ASM as part of a separate workstream in order to ensure this can be done accurately, credibly and inclusively, with all the necessary supporting mechanisms. This work will seek multistakeholder input and collaboration.</p>
190.	CoC 5.1	Marguet	Refiner must have all certificate of origin of 100% material provide per everybody or every company.	Thank you for your comment, this has been noted.

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191.	CoC 5.1	Josue Ruiz Ramirez	Agree with definition.	Thanks and noted.
192.	CoC 5.1	Robin Gambhir	Yes. This definition is fine and would need to be revised or expanded to include investment products, which it does not contemplate at present. But, to be clear, it should not be changed and investment products should not be called recycled.	Thank you for your feedback, this has been noted. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
193.	CoC 5.1	Charlène NEMSON	This definition is fine	Thanks and noted.
194.	CoC 5.1	Sharon Zimmerman	This is the appropriate definition of recycled metals.	Thanks and noted.
195.	CoC 5.1	Gianluca Pegoraro	You should align the definition of recycled material to the ISO 14021 standard, these are post consumer material examples	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry to identify a suitable definition that aligned with necessary guidelines, and to ensure clarity for all parties and especially for consumers.
196.	CoC 5.1		Keep your definition the same don't change it, doing so will weaken the standards around recycled metals.	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
197.	CoC 5.1	Liz Oppenheim	Yes, this is a sensible definition, and surely what people who are seeking recycled material expect	Thanks and noted.
198.	CoC 5.1	Matthew Klahn	This is a great definition and should be adhered to!	Thanks and noted.

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199.	CoC 5.1	Therese Mørch	Recycled sounds wrong since the metal could never re-enter its original cycle from a Cradle-to-cradle point of view. Consider other terminology such as re-entered, re-used, pre-used, post-cycled or other fancy term.	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
200.	CoC 5.1	Ambar Valles	The definition mentions "post-consumer", i think it should also include the term "pre-consumer". For example, "pre-consumer gold/silver/pgm metal bearing products such as scrap, waste metals and materials arising during refining and product manufacturing.."	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers. The inclusion of "pre-consumer" may be an added refinement.
201.	CoC 5.1	Francesc Picanyol	We should consider two different concepts as real recycling in jewellery industry is quite non existence. 1. Recycled gold when it comes from products containing for instance less than 2% of gold destined to be discarded. 2. Reprocessed gold which is what jewellers and other actors always have been doing	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
202.	CoC 5.1	Will Nevins-Alderfer	I believe this is too broad. Again, it is misleading to consumers, as people assume recycled is post-consumer. RJC has a responsibility to be clear and transparent about this. I would call for a redefinition of post manufacturing products that upholds the RJC tenants of transparency, ethics and full-disclosure.	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
203.	CoC 5.1	United Precious Metal Refining, Inc. -	Material that is "transformed" in some way, changed in a way - in purity or intrinsically.	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.

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		Michael A. Mikolay		
204.		Rodolfo Orozco	We believe the current definition can benefit from the proposed expansion as covered in the 18th question	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
205.	CoC 5.1	UFBJOP	A solid definition of recycled should be provided based on the definition provided by the EU. We propose changing the name from "recycled" gold to "reprocessed."	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
206.	CoC 5.1	Metalor	Metalor is not supporting the new sections incorporated in the "new" definition of the Recycled material. Generally speaking those new categories would not be regarded as recycled material by Metalor customers and as far as new section c) it is clear for Metalor that we are talking about mining and not recycled material. Therefore, Metalor advocates to keep the definition of recycled material as it is today with no additional change.	Thank you for your feedback. The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
The RJC is looking to understand stakeholder thoughts on the inclusion of mining by-product & investment in recycled materials (metals only). Please provide your thoughts on the definition given and suggest any improvements.				
207.	CoC 5.1	Pueksa Karnsomchok e	What do you mean by mining by product?	This would relate to mines whose main output is not an eligible material (e.g. gold, silver, pgm) but who have a small output as a by-product of the primary material e.g. gold as by-product from a copper mine.
208.	CoC 5.1	Sharon Zimmerman	Consumer perception of the definition of recycled metals does NOT include the understanding that investment materials are also used in "recycled metals". Consumers	Thank you for your comment – this will be taken into consideration when reviewing the definition of recycled.



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			don't understand that at all and if informed about it, they would view it as deceptive. I don't agree that investment materials should be included in the definition of recycled.	The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
209.	CoC 5.1	Tania Pelser	Definitely not recycled as it originated from a mine. Still falls under a mining permit and they can mine it. Origin is a mine	There seems to be a general consensus that mining by-product should not be included in the CoC definition fo recycled and this is being removed from the next draft.
210.	CoC 5.1	Grant Crosse	Not recycled - it's a primary source material. Secondary would be if it had undergone a refining process and gone into the market, then recycled.	There seems to be a general consensus that mining by-product should not be included in the CoC definition fo recycled and this is being removed from the next draft.
211.	CoC 5.1	Eduard Stefanescu	Conversations with customers and stakeholders showed that this would be a weakening of the standard regarding the kind of material entering the recycled market. We are not fully supporting this expansion of scope.	There seems to be a general consensus that mining by-product should not be included in the CoC definition fo recycled and this is being removed from the next draft.
212.	CoC 5.1	Richemont	c. Gold from mining by-products must remain in the mined category	There seems to be a general consensus that mining by-product should not be included in the CoC definition fo recycled and this is being removed from the next draft.
213.	CoC 5.1	Sharon Zimmerman	<p>As a designer who works directly with the public, I think that the public has a right to know the origins of the materials in their jewelry. By revising the definition of recycled to include by-product from mining of other ore, consumers would be purchasing jewelry made from non-recycled materials without being aware of it.</p> <p>Same goes for the addition of bullion and investment materials to the recycled definition. Public perception of the jewelry industry matters, and each time we play fast and</p>	<p>The definition is being further reviewed and RJC is actively engaged with organisations in the industry to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>In relation to mining by-product there seems to be a general consensus that this should not be included in the CoC standard and this is being removed from the next draft.</p>

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			loose with these definitions, it erodes the public's trust. I urge you not to weaken your own standards. Do not include investment material and ore by-product in the definition of recycled.	
214.	CoC 5.1		This definition allows for anything that could just have been sold from a refiner to another refiner/manufacturer to be considered recycled - that does not make sense. Recycled should mean post-consumer.	The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
215.	CoC 5.1	Kenna McCall	I am a jewelry designer and gem cutter in Canada. I buy all my supplies from the US. I am an ethical jewelry provider and part of the slow fashion movement. If the criteria for recycled materials are expanded, I cannot in good conscience continue to purchase them from US providers. When I say I use recycled materials I mean recycled materials, not by products or anything else that doesn't fit the common definition of recycled. I fear if I did my customers would feel I was trying to "con" them, just like I feel "conned" by the loosening of criteria for recycled materials. The only people who benefit from this change are the metal producers/processors. I don't think this is in the best interest of the overall jewelry industry nor the customers. Metals from outside Europe or North America sometimes contain toxic elements and I have done a lot of public education about the importance of buying jewelry that has been made with safe metals from regulated countries. Playing fast and loose with definitions of labels such as recycled further depletes the credibility and trust of the industry.	Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.

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216.	CoC 5.1	Richemont	b. Gold from bullion and investment products cannot be considered recycled	The definition of recycled is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
217.	CoC 5.1	Arien Gessner, Rio Grande, Richline	<p>The new items highlighted in red would essentially mean that any material passing through a refinery could be labelled as "recycled". This area raised significant concerns where the suggested language could be really disruptive to the industry.</p> <p>An entity shall have systems in place to ensure that eligible recycled material declarations are only issued for material sourced from the following:</p> <p>a. High-value gold, silver or PGM: scrap and waste precious metals from the jewellery and manufacturing process, or postconsumer precious metal products, such as jewellery and ornaments.</p> <p>b. bullion and investment products that have been reprocessed to a customer or industry standard. This does not include investment products.</p> <p>c. Industrial gold, silver or PGM: waste electrical and electronic equipment, or industrial components such as spent catalysts and fuel cells.</p> <p>d. By-product from the mining of other ore(s) which have undergone further refining or processing to extract eligible material</p>	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>

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8.		Pueksa Karnsomchok e	Our understanding is there are 2 sources customers are looking for. 1 fresh silver for jewellery, 2 100% recycled. If you cut out the bullion option as a material, then material available for sourcing to the customer will be limited. If it needs to be excluded, there needs to be a justification. Fresh material means can only come direct from mine in the form of bars and not bullion form. Or if it's in bullion but can be traced direct to mine then that can be considered mined. It is not always clear, however. The Definition needs to be clear.	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>The specific needs of the different customer bases will be taken into account.</p>
9.	CoC 5.1	Christen Coomer	Recycled materials should be limited to those which are truly reused or otherwise reintroduced into the supply from previous practices. By-products of the manufacturing process should not be considered recycled materials. To consider them as such would be a step back in the metals industry's efforts to make changes that have a positive impact on both ethical and environmental standards.	<p>The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>
220.	CoC 5.1	Christine Guibara	Please do not consider metals that are a by-product of mining other metals as recycled. That would make me question the "Recycled" label on metals in general and either cease to use them (since they would still be promoting further mining) or look for other alternative companies that have a more stringent definition.	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>
221.	CoC 5.1	Maral Rapp	"Fine jewelry", "precious metals", "recycled precious metals" - all have definitions that we live by. My customers rely on me to be a source of truthful information about the jewelry	Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the

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			they buy from me. Changing the definition of recycled to include metals that are not recycled will make it harder to sell jewelry. Please do not include ore by-product in your standards about recycled metals.	industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers. There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
222.	CoC 5.1	Liz Oppenheim	I find the proposed change to the definition of recycled metals confounding. The inclusion of newly mined byproduct metals in the category of recycled materials is misleading to consumers, and if adopted, would create confusion and additional work on the part of consumers and producers who truly care about reducing demand for mining while still supporting the industry. I hope you will reconsider	The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers. There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
223.		Natalia Uribe	The provision 7.1 of the consultation Standard draft is proposing to expand the definition of eligible recycled material. The expansion are the items b and d.: b. Bullion and investment products that have been reprocessed to a customer or industry standard. This does not include investment products. d. By-product from the mining of other ore(s) which have undergone further refining or processing to extract eligible material These two additions will produce unintended negative consequences for the inclusion of the ASM sector. Materials that would have been reprocessed anyway and add little	Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.

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			<p>value in terms of positive impact will now be easily labeled as “ethically sourced”. These options become unregulated source of gold into the certified recycled option. This would make the so-called “recycled” option even more appealing, since it is easy and relatively inexpensive. We fear that companies may be encouraged to choose “recycling only” sourcing policies, using an environmental argument that does not accurately represent the purported impact. By legitimizing and encouraging such choices, RJC will strengthen the “business as usual” and will jeopardize the engagement of the entire jewelry industry with the ASM sector. Reprocessing gold previously mined in unknown conditions and calling it “responsible” will not reduce the ASM, which will continue to face enormous challenges, offering its minerals to the informal markets, and without getting any support, will become even more marginalized. Read the blog: Is recycled gold an ethical choice?</p> <p>Recommendation: This is why we call for a re-definition of the concept of “recycled gold”, that could be aligned with the definition of the “real recycled” promoted by the Precious Metals Impact Forum (PMIF), where RJC is participating key industry initiatives, refiners, jewelry brands, and NGOs. This redefinition should allow to differentiate gold resulting from a real recycling process from re-refined gold, establishing a narrower approach, more in line with the general perception of recycling i.e. the recovery of gold destined to be</p>	

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			<p>discarded. This definition should also prevent artificially created recycled gold.</p> <p>The proposed definitions are:</p> <p>1) RECYCLED GOLD – Gold recovered from any product containing less than 2% of gold in weight destined to be discarded, and returned to a refiner or other downstream intermediate processor to begin a new life cycle as “recycled gold”. Freshly mined material, including tailings and any wastes and by-products of mining operations are excluded from this section.</p> <p>2) REPROCESSED GOLD — Gold produced from any product containing more than 2% of gold in weight with the purpose of changing its state (e.g., bullion melted to create jewelry, jewelry melted to become a bar being sent to a refinery, unsold or used or broken jewelry being melted to create new jewelry or a different type of product, sputtering targets, manufacturing scraps, ...).</p> <p>PMIF will publish the proposal and ARM will update this message, once published.</p>	
224.	CoC 5.1		<p>This is an absurd proposal. Newly-mined material should never be labeled “recycled”.</p> <p>I strongly oppose this definition - it’s misleading, bordering on deceitfulness.</p>	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p>

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				There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft
225.	CoC 5.1		"Recycled" is "previously used," "by-product" is not "recycled." "By-product" of any mining should be defined as such	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft</p>
226.	CoC 5.1	Shaya Durbin	I am alarmed and disturbed by the language "By-product from the mining of other ore(s) which have undergone further refining or processing to extract eligible material" to the definition of recycled metal. This is absolutely the polar opposite of what my clients ask for and expect when they request recycled metals. And it opens the door for unethical parties to profit from a term that comes with a certain level of expectation on the part of my clients and for which they pay a premium. We are also in an era of very savvy customers; people who do their own research and have been fed greenwashing for so long that something like this could hurt the integrity of the ethical jewelry world for years to come. This loophole would so undermine the term "recycled" that I would no longer, in good faith, be able to offer it to my clients.	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>

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227.	CoC 5.1		The definition of recycled metals must *NOT* include freshly mined material! To define it that way is misleading at best and renders the term essentially meaningless!!	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
228.	CoC 5.1	Joshua Wendler	<p>I disagree with the proposed changes to "Eligible Recyclable Material" Amendment, specifically section 5.1 c) By-product from the mining of other ore(s) which have undergone further refining or processing to extract eligible material.</p> <p>While it is noble to process the by-product in order to extract eligible materials, I think this alters the definition of recycled metals, and misconstrues the definition to the end client. In my case, a manufacturer could be using this definition to source metal from a mine using this definition, and skirt around using materials that have been recycled from old jewelry, or electronic/industrial waste - which is the product my customers believe they are purchasing when I sell "recycled" metals jewelry.</p> <p>Furthermore, I want to encourage mining industry to continue to recycle metals as defined by Section: 5.1 An entity shall have systems in place to ensure that eligible recycled material declarations are only issued for material sourced from the following: a. High-value gold, silver or PGM: scrap and waste precious metals from the jewellery and manufacturing process, or postconsumer precious metal products, such as jewellery and ornaments.</p>	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>

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			<p>b. bullion and investment products that have been reprocessed to a customer or industry standard.</p> <p>I want my dollars to support these definitions in section 5.1 a) and b), above. By including section c), we allow for an industry standard that can ignore the traditional concepts of recycled, and still use the branding to sell product.</p> <p>In conclusion, I ask the RJC to consider removing proposed change c) from section 5.1 in "Eligible Recyclable Material". It would mean a great deal to my colleagues, our customers, and our planet to keep firm definitions in place for terms this important.</p>	
229.	CoC 5.1	Jen Leddy Barnes	Specifically concerned about the definition of recycled metals proposed amendment of adding section 5.1.c. The definition of "recycled" is already getting stretched and it seems crucial to focus on re-processed existing industrial or jewelry related or post-consumer material, not by-products of others processes like newly-mined.	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>
230.	CoC 5.1	Sabrina Karib	The RJC has been a pioneer in setting up rules to preserve the environment and to promote social responsible behavior. When other standards included investment gold in the definition of recyclable gold, the RJC took a stand and did not compromise. It excluded investment gold from its CoC eligible material. Now that public awareness is finally growing towards these topics, it could be very detrimental to the reputation of the RJC to go backwards and have a wide	Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, such as the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.

No.	CoC Provision/ Topic	Name	Comment	Response
			definition of recycled gold. In addition, as the current trend is to increased cooperation, standards have a duty to align their definitions.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
231.	CoC 5.1	Sabrina Karib/PMIF	<p>The RJC has been a pioneer setting standards to promote corporate social responsibility. When other initiatives included investment gold in their definition of recycled gold, the RJC took a stand and refused to compromise. Now that public awareness has finally been raised to environmental issues and greenwashing, there is an important risk for the credibility of the CoC norm to expand the scope of eligible CoC recycled material.</p> <p>In particular in view of the fact that other norms are becoming more strict and narrow their definition in order to address the concerns of the public. Aware of the risk of being accused of greenwashing going forward, the PMIF decided to create an ad-hoc working group, gathering a number of experts and relevant stakeholders, to redefine recycled gold. Prior to the publication of the proposed new definition (which will be sent via email), gold was considered to be “recycled” if it has been transformed at least once after its primary refining from freshly mined gold. The specifics of which type of gold is included or not differs between OECD or current standard setters (LBMA vs RJC vs RMI vs UAE or other standard setters). This means that freshly mined gold can be converted into recycled without ever seeing a consumer. This definition makes it very easy to artificially “create” recycled gold, which currently represents almost all refined gold that would undertake an additional refining process. As the majority of the consumers associate the definition of</p>	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>



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			recycled with responsible, there was a need to come up with a more precise definition of what “recycled” gold is, that fulfills the criteria given by the general perception of recycling. This will then, by its nature, mean that recycled gold is differentiated from gold that is simply refined and from gold that has been reprocessed. We, as the Precious Metals Impact Forum, advocate for more harmonization and recommend that the RJC adopts the definition prepared by our working group.	
232.	CoC 5	Natalia Uribe	To narrow down the definition of the “recycled gold” so as to avoid the risk of misleading customers regarding the actual ESG impacts of recycling gold that is simply being re-refined.	Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
233.	CoC 5.1	PX Precinox	We strongly support the new definition of recycled gold proposed by the Precious Metal Impact Forum. As a swiss refining company with a strong market position in the watch industry, we are best able to witness how the current definition of recycled gold can be misused and can so conveniently mislead the market and consumers. We are very concerned that the current definition of recycled gold permits and tolerates greenwashing, which will soon or later tarnish our sector's reputation.	Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
234.	CoC 7	Emily Phillippy, Boukje Theeuwes.	The provision 7.1 of the consultation Standard draft is proposing to expand the definition of eligible recycled material. The expansion are the items b and d.: a. High-value gold, silver or PGM: scrap and waste precious metals from the jewellery and manufacturing process, or post-consumer precious metal products, such as jewellery and ornaments.	Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.



No.	CoC Provision/ Topic	Name	Comment	Response
			<p>b. Bullion and investment products that have been reprocessed to a customer or industry standard. This does not include investment products. c. Industrial gold, silver or PGM: waste electrical and electronic equipment, or industrial components such as spent catalysts and fuel cells. d. By-product from the mining of other ore(s) which have undergone further refining or processing to extract eligible material These two additions will produce unintended negative consequences for the inclusion of the ASM sector. Materials that would have been reprocessed anyway and add little value in terms of positive impact will now be easily labeled as “ethically sourced”. These options become unregulated source of gold into the certified recycled option. This would make the so-called “recycled” option even more appealing, since it is easy and relatively inexpensive. We fear that companies may be encouraged to choose “recycling only” sourcing policies, using an environmental argument that does not accurately represent the purported impact. By legitimizing and encouraging such choices, RJC will strengthen the “business as usual” and will jeopardize the engagement of the entire jewelry industry with the ASM sector. Reprocessing gold previously mined in unknown conditions and calling it “responsible” will not reduce the ASM, which will continue to face enormous challenges, offering its minerals to the informal markets, and without getting any support, will become even more marginalized. Read the blog: Is recycled gold an ethical choice?</p> <p>Recommendation: This is why we call for a re-definition of the concept of “recycled gold”, that could be aligned with the definition of the “real recycled” promoted by the Precious</p>	<p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>

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			Metals Impact Forum (PMIF), where key industry initiatives, refiners, jewelry brands, and NGOs are participating. This redefinition should allow to differentiate gold resulting from a real recycling process from rerefined gold, establishing a narrower approach, more in line with the general perception of recycling i.e. the recovery of gold destined to be discarded. This definition should also prevent artificially created recycled gold. The proposed definitions are: 1) RECYCLED GOLD: Gold recovered from any product containing less than 2% of gold in weight destined to be discarded, and returned to a refiner or other downstream intermediate processor to begin a new life cycle as "recycled gold". Freshly mined material, including tailings and any wastes and by-products of mining operations are excluded from this section. 2) REPROCESSED GOLD: Gold produced from any product containing more than 2% of gold in weight with the purpose of changing its state (e.g., bullion melted to create jewelry, jewelry melted to become a bar being sent to a refinery, unsold or used or broken jewelry being melted to create new jewelry or a different type of product, sputtering targets, manufacturing scraps, ...).	
235.	CoC 5.1		The fact that investment products would now be included in the definition of recycled is outrageous. Gold making a quick stop at a bank between refiner and manufacturer would all of a sudden make it "recycled"? Industry definitions of this term are already too lax and this continues to add to the murky greenwashing happening in the jewelry industry that presents "recycled" gold as eco-friendly.	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>

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236.	CoC 5		I am unhappy with the proposed additions to standards about "recycled metals," which would substantially change what we think of as "recycled". The core proposed change to the definition of recycled metals would include "By-product from the mining of other ore(s) which have undergone further refining or processing to extract eligible material". In other words, if silver is mined along with gold, the newly mined silver could now be classified as "recycled" according to their proposed change. This is deeply unethical.	<p>Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.</p> <p>There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.</p>
237.	CoC 5.1	Francesc Picanyol	Scrap from mining should be out of CoC.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
238.	CoC 5.1	Josue Ruiz Ramirez	This might be conflicting with other standards, by-products for other standards are considered primary material (not recycled)	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
239.	CoC 5.1		So would the silver that comes out of a gold mine as a byproduct be considered recycled even though it was just extracted from the earth? That's just newly mined metal.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
240.	CoC 5.1	Robin Gambhir	The definition of recycled does not (and should not) include mining by products.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
241.	CoC 5.1	Charlène NEMSON	This is an absolute NO NO. It would be hard enough to explain why bullions are considered recycled ; it could be considered dishonest to call "recycled" the material issued from mining by-products. The word recycling implies that at least one product life cycle already happened.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.

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242.	CoC 5.1	Sharon Zimmerman	<p>The industry is already at risk because a growing segment of the public views it with mistrust. Redefining recycled metals and what's included would further erode trust. It would render the definition of recycled meaningless and I would no longer use the term in my marketing materials. I would also advise my business clients to stop using it as a term.</p> <p>Think about this issue like you are a consumer with no understanding of jewelry, but you know what "recycled" means in other contexts. Why would a consumer look at ore by-product and think that it meets the definition of recycled? They wouldn't. That is new material, not recycled. More importantly, ask yourselves who is helped by this new definition? Does this help the industry be more sustainable or ethical? Or does it help your members who want weaker standards? As I see it, there are no upsides to changing the definition, but there is a long list of downsides. Leave the definition alone unless you are planning to strengthen, not weaken the definition.</p>	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
243.	CoC 5.1	Gianluca Pegoraro	You should align the definition of recycled material to the ISO 14021 standard, so metal by-products will be considered pre-consumer recycled materials	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
244.	CoC 5.1	Christine Guibara	I do not believe the definition should be expanded and it hurts the validity of "recycled" metals in general.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
245.	CoC 5.1	Liz Oppenheim	Absolutely inappropriate. Please reconsider. Why not call it byproduct? I can't fathom how anyone could consider this recycled	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.

No.	CoC Provision/ Topic	Name	Comment	Response
246.	CoC 5.1		Mining by-product should be defined as mined, by-product, or recovered from mining	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
247.	CoC 5.1	Shaya Durbin	This is a terrible idea, completely contrary to the expectation of clients.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
248.	CoC 5.1	Matthew Klahn	Absolutely NOT! Recycled should mean “post-consumer recycled” or as close to that as possible!	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
249.	CoC 5.1	Jen Leddy Barnes	I disagree on this expansion. I propose removing section 5.1.c. because would open a loop-hole into newly-mined material being categorized as recycled. Recycled should strictly stand for existing material that is being re-processed or post-consumer (industrial or jewelry specific), undergoing a secondary stage to make viable for re-use. Not merely a bi-product of a first stage process.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
250.	CoC 5.1	Ambar Valles	Recommend comparing the definition to other industry standard definitions like LBMA, LPPM, Copper Mark, RMI, etc. to achieve industry harmonization.	Thank you for your comment. The definition is being further reviewed and RJC is actively engaged with organisations in the industry, including the PMIF, to identify a suitable definition and to ensure clarity for all parties and especially for consumers.
251.	CoC 5.1		This is co-opting the use of the word "recycled" and is a form of greenwashing. Please do not do this. It is unethical.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
252.	CoC 5.1	Patrick SCHEIN	This gold can only enter CoC as mined gold. treating a mine sub product or tailing is not recycling.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.

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253.	CoC 5.1	United Precious Metal Refining, Inc. - Michael A. Mikola	It is a by product and must be refined again to make it useful. I would say at point it becomes recycled.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
254.	CoC 5.1	Marianna Smirnova, RMI	General industry practice is that mining by-product is considered mined or intermediary material, and not recycled, this change will no be aligned with the RMI Gold standard and likely not aligned with the OECD DDG, as this will lead to auditees classifying material as recycled and not conducting proper due diligence, traceability, CAHRAs and risks assessment. Unlike the COC provision 1 removal which is more a formality since the content is covered under COP 2019, the change to recycled definition is likely to lead to RMI reconsidering RJC recognition all together	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
255.	CoC 5.1	Susan Wheeler	The expansion of the scope of recycled materials gives undue risk to the materials allowed in under the label of recycled. Gold as a byproduct of an uncertified mine could come through this expansion as a loophole. For example, gold could be a byproduct of a copper mine that participates in child labour, then enters into the gold supply chain, as "recycled" leaving great risk to the integrity of the RJC. One third of all gold is produced as a by product of copper, lead, and zinc production. Copper, for example, must be electrolytically refined to raise its purity from 99% to more than 99.99% as required for many industrial purposes.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.

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256.	CoC 5.1	Rodolfo Orozco	We believe the proposed expansion is good enough as it is.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
257.	COC 5.1	UFBJOP	We disagree with the inclusion of mining by-product as it gives an unfair advantage to large industrial mines. Do not create a way for n industrial non-COC mine to create COC gold.	There seems to be a general consensus that mining by-product should not be included in the CoC definition of recycled and this is being removed from the next draft.
RJC is seeking input from stakeholders on what additional definition is needed on what elements may constitute minor components in a finished product that can be excluded when declaring a product as CoC. For example, in a piece of jewellery made of a mix of COC and non-COC materials what level of detail should be declared in respect of the non-COC elements.				
258.		Grant Crosse	In the long-term, you will have a blockchain enabled connection to the watch and in there you can digitally list all components and where they are sourced from to make up that watch. For example, with multi-metal jewellery where you list the source of the different materials in the blockchain document. This is where we need to get to, but need to decide on the guidelines and systems to use.	Thank you for your comment. This has been noted.
259.		Jim Kuipers	You can only quantify what is certified and you need to clearly state that. That's all you really need to say.	Thank you and noted.
260.		Emma Wilson	Had a lot of feedback from auditors on this. Speaks to the transfer document and the level of information needed. Current guidance is perhaps too vague. Some members would do bare minimum, while some go to finite level of detail. More guidance needed on what level of information is expected.	Thank you for your comment. This will be taken into account in the review of the guidance and the next draft template of the Transfer Document.

No.	CoC Provision/ Topic	Name	Comment	Response
261.		Marguet	Tracability must be done on stones and diamond in the same time than precious metal in complete level of detail	Diamonds and coloured gemstones are not in scope for the Chain of Custody at this stage. If the scope is expanded this will be taken into account.
262.			Everything about those stones should be declared - that they are a mix of CoC and not and which ones	Diamonds and coloured gemstones are not in scope for the Chain of Custody at this stage. If the scope is expanded this will be taken into account.
263.		Robin Gambhir	You cannot claim a product to be CoC unless it is 100% CoC. It's very simple--just list the materials what claims you are making about each material in the product and what the basis for those claims are. Food labelling with ingredients and nutritional information is not a terrible analog here.	The analogy is interesting. RJC is seeking input on whether the declaration should list The elements that are CoC Or The elements that are excluded
264.		Charlène NEMSON	Should depend on the relative weight of each elements	The product declaration requirements will be amended to allow Members to either declare the CoC or non-CoC elements, depending on which forms the greater part and which provides the greater clarity to consumers.
265.		Sharon Zimmerman	All of the details should be declared. Otherwise, what purpose does chain of custody serve?	The product declaration requirements will be amended to allow Members to either declare the CoC or non-CoC elements, depending on which forms the greater part and which provides the greater clarity to consumers.
266.		Therese Mørch	In essence, if the transparency is not there it should be declared as 'non-traceable' with what ever info is available, I.e you may know country of origin, but cannot vouch for the ways the gem reached market, but that it's been cut under graded conditions.	Diamonds and coloured gemstones are not in scope for the Chain of Custody at this stage. If the scope is expanded this will be taken into account.

No.	CoC Provision/ Topic	Name	Comment	Response
267.		Francesc Picanyol	Most important thing is that buyer is receiving information about % of this mix.	The product declaration requirements will be amended to allow Members to either declare the CoC or non-CoC elements, depending on which forms the greater part and which provides the greater clarity to consumers.
268.		Susan Wheeler	The CoC can improve by expanding the inclusion of ASM into the list of acceptable and certified materials allowed. This can be done for gemstones, gold and diamonds. Expecting and meeting the OECD guidelines is now feasible and can be adapted into clear standards that can be audited. The change will take flexibility but is made possible through the work NGOs have done in mines across the globe as well as the development of CRAFT code and it's implementation across the gemstone and gold sector.	<p>ASM is currently eligible CoC material under the mined material category, specifically Fairmined and fairtrade. This is noted in the guidance and is included in the transfer document under 'Fairmined' and 'Fairtrade'. More detail can be added to the transfer document to be more specific to ASM. Additional information can also be added to the guidance.</p> <p>RJC are currently developing a workplan on ASM in order to support industry in responsible sourcing from ASM, as well as supporting ASM to adopt responsible business practices. This project will seek to collaborate with ASM stakeholders to develop this support.</p> <p>Stones are currently out of scope for the CoC standard.</p>
269.		Rodolfo Orozco	We believe that at the very least the member should offer information regarding the type of non-CoC material, its place of origin and the mining companies and workshops involved in the manufacture of any piece of jewellery with mixed material.	Thank you and noted.
270.		UFBJOP	We would propose retaining the list of non-CoC elements declared on a piece of jewellery or a watch as now and not including a declaration for the percentage of non-CoC.	Thank you and noted.
The RJC published supplementary guidance in August 2021 on the conditions under which a Member could suspend the issue of Transfer Documents outsourced contractors and the related systems required. This has now been incorporated into the revised Standard. The RJC is seeking guidance from Stakeholders on these.				

No.	CoC Provision/ Topic	Name	Comment	Response
271.	CoC 9	Marguet	Transfer document must be send only on the customer request, but must be available at anytime at producer	If the transfer document does not accompany the material at each step this could lead to issues further down the chain as entities would not be able to make further claims. At this moment, RJC is not considering removing the requirement for transfer document completely.
272.	CoC 9	Emma Wilson	When talking to auditors when the guidance was first released, and they had challenges with some of the members and the differing levels of info the members were receiving, or the understanding required. More detail needed on when this applies and what materials could be covered and not.	This will be included in the guidance once the final definition of the template is agreed.
273.	CoC 9	Robin Gambhir	If you don't have documentation, you don't of have CoC. It's kind of a first principals thing.	The option to suspend the issue of transfer documents is only permitted for specific cases with outsourcing contractors where the process is covered under a single ERP system. RJC is not considering removing the requirement for transfer document completely.
274.	CoC 9	Olivier Demierre - MKS PAMP	We consider this addition helpful	Thank you and noted.
275.	CoC 9	Rodolfo Orozco	The guideline published is useful as it covers a scenario in which a member could be left at a loss on how to proceed while complying to RJC standards.	Thank you and noted.