

RJC Chain of Custody 2017 Review – Comment Report with responses on round 3 consultation

This document includes a summary of comments received as part of the round 3 CoC review as well as responses to these comments. These comments were received between 11 April 2024 and 13 May 2024.

Table 1 – Comments and responses on the Chain of Custody Standard from round 3 consultation.

	Question	Comment	Stakeholder	RJC response
1	Question 1: Eligible Recycled and reclaimed Definition Provision 5 has been amended to incorporate a new RJC definition of all recycled and reclaimed materials in RJC scope (gold, silver, PGM), which has taken account of the PMIF and ISO draft proposals as well as definitions in other aligned standards. This follows the extensive feedback received from round 2. This definition includes recognition of consensus around pre- and post-consumer sources, and how these would be allocated	Categories are clear. Use only "recycled" and no other name	Philip Olden, CIBJO	Thank you for your feedback. We have received significantly divergent views from stakeholders and have considered how to incorporate these and create a definition that moves our Standard forward, in line with RJC's sustainability objectives, while recognising the need to maintain alignment with other standards and initiatives. Our new definition will be made available once the review and approval cycle is completed with a focus on ensuring there is transparency for customers and end-consumers and controls in relation to claims made for recycled content.

	<p>to the new categories – recycled (broadly speaking post-consumer and waste) and reclaimed (comprising pre-consumer manufacturing waste and other similar sources - name to be determined (TBD)).</p> <p>Do you believe these definitions and the associated categories are appropriate for the industry and sufficiently clear to all stakeholder groups, including consumers?</p>			
2	See Question 1 Eligible Recycled and reclaimed Definition	No, we do not support "reclaimed" as a category		See above response to comment 1
3	See Question 1 Eligible Recycled and reclaimed Definition	No. Use recycled for all	Pierre Laffite	See above response to comment 1

4	See Question 1 Eligible Recycled and reclaimed Definition	No	Kandeep, Refinery	See above response to comment 1
5	See Question 1 Eligible Recycled and reclaimed Definition	Adding a new classification of 'reclaimed gold' will not add clarity for the consumer... Additionally, the distinction (as reflected in the proposed added classification) seems to misrepresent the point at which material may be returned - the consumer is frequently not the main entity returning material for re-refining (recycling). The key point to capture is that material is returned for re-refining after which it enters a new product lifecycle, and very substantial volumes (e.g. unwanted inventory) might be returned at various points along the supply chain of gold. Indeed, this is a normal function of the major gold jewellery markets in many countries.	John Mulligan, World Gold Council & World Jewellery Confederation (CIBJO)	See above response to comment 1
6	See Question 1 Eligible Recycled and reclaimed Definition	No, the definition is not appropriate for the consumer as well as for the industry. Much better use only RECYCLED.	Gaetano Cavalieri, CIBJO	See above response to comment 1
7	See Question 1 Eligible Recycled and reclaimed Definition	the plain answer is NO. We do not believe such differentiation is useful to the industry and we strongly advocate to keep one definition called "recycled material" that will encompass everything. The new approach will bring confusion to the market and in our view does not serve any purpose.	Jose Camino, Metalor Technologies	See above response to comment 1
8	See Question 1 Eligible Recycled and reclaimed Definition	NO	Dean Johnston, D&M Jewellery Finishers Ltd	See above response to comment 1
9	See Question 1 Eligible Recycled and reclaimed Definition	No, it's confusing		See above response to comment 1
10	See Question 1 Eligible Recycled and reclaimed Definition	OK - definition understandable	Lea Meheust, Hermes	See above response to comment 1

11	See Question 1 Eligible Recycled and reclaimed Definition	No. According to the proposed definition, materials that are made from 100% recycled material that become a waste in a pre-consumer process in the value chain will lose its property as recycled material. Furthermore will the new categorization of "Reclaimed" mix pre-consumer waste from primary material with recycled material under the same name. This is misleading as no differentiation between pre-consumer material from recycled material and non-recycled origin is possible. It can lead to "Green-Washing" of pre-consumer material made from primary material as it is in the same category as pre-consumer material made from recycled material.	S. Eitze, SAXONIA Holding GmbH	See above response to comment 1
12	See Question 1 Eligible Recycled and reclaimed Definition	No. The jewelry industry definition of recycled should align with general public understanding as well as guidance from the U.S. FTC for all industries - meaning material that is diverted from a waste stream. Therefore, it is not appropriate to include jewelry, which was never destined to be discarded into a waste stream, under the category of "recycled". For consumers to have clarity on what constitutes recycled material, it should only include waste materials as clearly delineated by the PMIF definition. Jewelry should be moved to the category of "reprocessed".		See above response to comment 1
13	See Question 1 Eligible Recycled and reclaimed Definition	The term "recycled" should be used in a way that aligns with the general public's understanding and the guidance from the U.S. Federal Trade Commission. Typically, recycled materials refer to those diverted from the waste stream. However, precious metals used in jewelry production do not fit this definition, as they are not destined for the waste stream in the first place. To provide clarity for consumers, the jewelry industry may want to consider using a different term, such as "reprocessed," when referring to precious metals that have been recovered and reused, but were not originally part of the waste stream. This would help distinguish these materials from those that are truly recycled in the conventional sense. Maintaining transparency and avoiding potential confusion or greenwashing is important, especially as		See above response to comment 1

		sustainability becomes an increasingly important consideration for consumers in the jewelry market.		
14	See Question 1 Eligible Recycled and reclaimed Definition	<ul style="list-style-type: none"> •In general, we highly appreciate the effort and work done by RJC to align on a new definition of CoC materials. The new proposal is a huge step in clarifying and moving forward to a stricter direction which we also favour. •By creating the new category “reclaimed” the End of Life and End of Use concept has partially been considered and we agree with this approach. •For the new category we favor the wording remanufactured as it is rather established and is the most suitable for our use case. •Material derived from manufacturing processes are mentioned in both categories and is rather confusing. Further clarification is needed to distinguish which material belongs to each category. •The table on page 3 in general is not clear, rather confusing and leaves room for interpretation. We recommend to create an exhaustive list or clearly state it as non-exhaustive. •The comment on jewelry and ornament scrap (marked with **) is contradicting with the definition of “reclaimed”. If the idea is to allow traceable 100% recycled post-consumer material again to be returned as 100% post-consumer recycled, we agree to that conclusion. Please clarify the comment. 	Robin Kolvenbach, Argor-Heraeus SA	See above response to comment 1

		<ul style="list-style-type: none"> •We favour the approach mentioned in the production declaration for mixed sources. 		
15	See Question 1 Eligible Recycled and reclaimed Definition	<p>Answer: No. According to the proposed definition, materials that are made from 100% recycled material that become a waste in a pre-consumer process in the value chain will lose its property as recycled material. Furthermore will the new categorization of “Reclaimed” mix pre-consumer waste from primary material with recycled material under the same name. This is misleading as no differentiation between pre-consumer material from recycled material and non-recycled origin is possible. It can lead to “Green-Washing” of pre-consumer material made from primary material as it is in the same category as pre-consumer material made from recycled material.</p>	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	See above response to comment 1

16	See Question 1 Eligible Recycled and reclaimed Definition	Yes		See above response to comment 1
17	See Question 1 Eligible Recycled and reclaimed Definition	Basically, the new proposed definition, comprising the differentiation between pre- and post-consumer material are appropriate for the industry. However, taking into consideration the "Proposed RJC Definition of Recycled Materials For Consultation" document and the included table with different materials falling into the categories heading the table, the term "reclaimed" is not sufficiently clear. Please also note, "reclaimed" already exists under ISO 14021 with a different meaning. For "reclaimed", does RJC definition consider all grades of scrap, i.e. low- and high-grade form? There is further need of clarification with reagrds to eligible material sources coming from pre-consumer and covered by "reclaimed". Looking at consumers, I clearly doubt they will understand associated categories, first consumers will need to understand pre- and post consumer principle.		See above response to comment 1
18	See Question 1 Eligible Recycled and reclaimed Definition	I believe that customers are going to need educating about the difference between the two terms, but if the definitions are going to be universal and that CIBJO, ISO, LBMA and RMI are all on board and using the same terminology then this can be sorted.	Alice Rochester, Harriet Kelsall Bespoke Jewellery	See above response to comment 1
19	See Question 1 Eligible Recycled and reclaimed Definition	No. Agosi AG, as a precious metals refiner, does not support the introduction of a further term ("reclaimed") and thus opposes the propositions made to alter the eligible materials definition for RJC-CoC recycled materials. In our view, such a step would unnecessarily increase the complexity of a subject that depends on utmost clarity and transparency in the precious metals markets. Not only would it require more detailed explanations to impart the exact differentiation intended by a new materials category "reclaimed", and to make it understandable even in theory. In practical terms it would result in more complicated traceability documentation (reclaimed / recycled / mixed, see		See above response to comment 1

		5.3), and cause a huge technical effort to segregate eligible reclaimed and recycled materials in their respective processes for RJC-CoC products. All in all, this would lead to further encumbrances for the promotion of RJC-CoC recycled products and for the motivation of further precious metals companies to commit themselves to the RJC-CoC certification path and mission. Conclusion: If the eligible materials definition for RJC-CoC recycled materials is in need of change, we clearly favour a more uniform understanding of the term “recycled”, i.e. defining pre- & post-consumer materials as recycled according to generally accepted categories that are employed across several standards (e.g. Draft ISO/TC 174 Proposal for definitions of recycled gold and other gold typologies).		
20	See Question 1 Eligible Recycled and reclaimed Definition	No, these definitions are fraudulent, incomprehensible to consumers. In the email I sent you today I explain it more.	Andres Castellanos, Fairalloy	See above response to comment 1
21	See Question 1 Eligible Recycled and reclaimed Definition	The proposed definition is inconsistent with the public understanding of the term, as well as existing international, legal, and normative definitions of recycling, which are based on waste material. Proceeding with the proposed definition is misleading to consumers and can give the false impression of carbon neutrality or even offset, when in fact jewelry was never destined to be discarded into a waste stream. I request RJC to adopt a definition that aligns with these standards, limiting the term "recycled" to waste material and referring to other non-waste sources as "reprocessed precious metals."	Anonymous	See above response to comment 1
22	See Question 1 Eligible Recycled and reclaimed Definition	No. Please refer to the Open Letter dd 12 April 2024 from ARM supported by 11 other CSOs - including Solidaridad - as additional feedback related to this consultation. This open letter explains in more details the risks of greenwashing related to a definition that is not aligned with legal definitions and public expectations on “recycled”. The sources of the arguments can be found in the open letter.. Link:	Boukje Theeuwes, Solidaridad	See above response to comment 1

		https://www.responsiblemines.org/en/2024/04/advocating-for-transparent-practices-in-the-gold-industry-redefining-recycled-gold/		
23	See Question 1 Eligible Recycled and reclaimed Definition	It does not make sense to link it to post or pre consumer or the % of gold that it contains. If you are making something new for example sweeps, trees, waste then it is recycled. Repurposed is when you refine jewellery (used or not used) to make new jewellery.	Tania Pelser, Metal Concentrators SA (Pty) Ltd	See above response to comment 1
24	See Question 1 Eligible Recycled and reclaimed Definition	The EPMF would like to stress that both definitions: recycled and reclaimed, have a quite wide and broad interpretation. Moreover, the definition for reclaimed already exists under ISO 14021 with a different meaning. It is confusing to have same word/definition by RJC but with a different meaning as ISO 14021.	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	See above response to comment 1
25	See Question 1 Eligible Recycled and reclaimed Definition	No. Extending the terminology to 'Recycled & Reclaimed (or similar)' could be confusing for markets, customers and stakeholders and could have a negative impact on the credibility of the industry. Differentiating and separating these categories would be difficult to realise or even verify in the precious metals industry. It seems illusory to be able to clearly and unambiguously categorise every incoming material at the processor, but this increases the administrative effort and thus the throughput times of the materials. Both are significant cost factors! It would make more sense to follow the pre- and post-consumer approach within the term recycled.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	See above response to comment 1
26	See Question 1 Eligible Recycled and reclaimed Definition	Yes I think these categories are clear but not to consumers. I believe consumers will not understand the difference between reclaimed and recycled without clarification. Many consumers will not understand that a reclaimed item is produced from materials from a pre-consumer source. I think the term reclaimed is confusing to the general public. It is a secondary source of raw material.	Anna Gibbs	See above response to comment 1

27	Question 2: Eligible Recycled and reclaimed Definition Is the definition sufficiently clear as to the conditions under which the different sources can be classed as recycled or reclaimed?	No, the nomenclature should only be "Recycled" - and if necessary defined as "pre" or "post" consumer	Philip Olden, CIBJO	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.
28	See Question 2: Eligible Recycled and reclaimed Definition	The conditions are clear - we support the term "recycled" which is them further defined if necessary (e.g. recycled jewellery)		See above response to comment 27
29	See Question 2: Eligible Recycled and reclaimed Definition	No. Use recycled for all	Pierre Laffite	See above response to comment 27
30	See Question 2: Eligible Recycled and reclaimed Definition	No	Kandeep, Refinery	See above response to comment 27
31	See Question 2: Eligible Recycled and reclaimed Definition	The added distinction is neither practical or helpful	John Mulligan, World Gold Council & World Jewellery Confederation (CIBJO)	See above response to comment 27
32	See Question 2: Eligible Recycled and reclaimed Definition	No, not clear, Much better use only RECYCLED.	Gaetano Cavalieri, CIBJO	See above response to comment 27
33	See Question 2: Eligible Recycled and reclaimed Definition	The important aspect is what is the overall purpose of such artificial differentiation. And in our view we do not see the need of that. Most of our customers will deal with mixed products (recycled and reclaimed as per the proposal) and certainly will not be ready to make such a distinction -especially without understanding or sharing the potential benefits- that we challenge. a.	Jose Camino, Metalor Technologies	See above response to comment 27

34	See Question 2: Eligible Recycled and reclaimed Definition	ONLY RECLAIMED SHOULD BE USED	Dean Johnston, D&M Jewellery Finishers Ltd	See above response to comment 27
35	See Question 2: Eligible Recycled and reclaimed Definition	No, it's confusing and unnecessary		See above response to comment 27
36	See Question 2: Eligible Recycled and reclaimed Definition	yes, pre (reclaimed) and post consumer (recycled)	Lea Meheust, Hermes	See above response to comment 27
37	See Question 2: Eligible Recycled and reclaimed Definition	No, because reclaimed and recycled can be misleadingly understand as equal sustainable although in reclaimed material primary origin material will be covered up. The definition of "Melted manufacturing scrap fully traceable to eligible recycled material" is not only applicable to recycling material from post-consumer sources but also from pre-consumer sources. Therefore recycling material from pre-consumer sources which is fully traceable to eligible recycled material should not be mixed in a category with primary material from pre-consumer sources as it would with the "reclaimed" category.	S. Eitze, SAXONIA Holding GmbH	See above response to comment 27
38	See Question 2: Eligible Recycled and reclaimed Definition	What remains unclear is what constitutes "sufficient due diligence" to ensure that jewelry is post consumer. This is a loophole that is exploited by illegal mining operations that cast newly mined gold into jewelry at the mine site to be able to sell it into a "recycled" gold stream. The PMIF definitions of recycled and reprocessed do not leave this kind of room for ambiguity and subjectivity by making the dividing line between the two categories something that is measurable.		See above response to comment 27

39	See Question 2: Eligible Recycled and reclaimed Definition	Answer: No, because reclaimed and recycled can be misleadingly understand as equal sustainable although in reclaimed material primary origin material will be covered up. The definition of “Melted manufacturing scrap fully traceable to eligible recycled material” is not only applicable to recycling material from post-consumer sources but also from pre-consumer sources. Therefore recycling material from pre-consumer sources which is fully traceable to eligible recycled material should not be mixed in a category with primary material from pre-consumer sources as it would with the “reclaimed” category	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	Thank you for your feedback. We have noted your point about material previously certified as recycled and will finalise the source of inputs into different categories and will be providing additional guidance on the required due diligence and expectations in relation to verifying the sources of any materials entering this supply chain.
40	See Question 2: Eligible Recycled and reclaimed Definition	The definition of what qualifies as "sufficient due diligence" to verify the post-consumer status of jewelry materials is unclear. This ambiguity can potentially be exploited, as newly mined gold could be cast into jewelry at the mining site and then sold into the "recycled" gold supply chain. The definitions provided by the PMIF (Precious Metals Industry Foundation) for recycled and reprocessed materials are more clear-cut, with a measurable dividing line between the two categories. This helps avoid subjectivity and potential loopholes that could undermine the integrity of sustainability claims. Having objective, well-defined criteria is important to ensure transparency and prevent greenwashing, especially in industries like jewelry where the sourcing of raw materials is a significant sustainability concern for many consumers.		Thank you for your feedback. We will be providing additional guidance on the required due diligence and expectations in relation to verifying the sources of any materials entering this supply chain.
41	See Question 2: Eligible Recycled and reclaimed Definition	Could be more specified	Tobias, Schmiemann	See above response to comment 27
42	See Question 2: Eligible Recycled and reclaimed Definition	For "recycled", the conditions under which different sources can be classed as recycled are quite clear. But "reclaimed" requires further clarification, particularly for the types of material eligible to be comprised within this category.	Anonymous	See above response to comment 27

43	See Question 2: Eligible Recycled and reclaimed Definition	More information is needed about how the sources are defined. Do ingots count as pre- or post- consumer, for example? How are you going to differentiate between "semi-processed or finished items that have not entered the consumer market" and "jewellery and ornaments that are no longer required/desired or can no longer be used for their original purpose"?		See above response to comment 27
44	See Question 2: Eligible Recycled and reclaimed Definition	No, these definitions are fraudulent, same as #12.	Andres Castellanos, Fairalloy	See above response to comment 27
45	See Question 2: Eligible Recycled and reclaimed Definition	No as per above.	Tania Pelser, Metal Concentrators SA (Pty) Ltd	See above response to comment 27
46	See Question 2: Eligible Recycled and reclaimed Definition	The EPMF sees a need for better clarification on: (i) reclaimed: does RJC definition consider all grades of scrap: low-grade and high-grade form? Is reclaimed coming from the pre-consumer? Besides, RJC proposes to define recovered materials coming from the pre-consumer phase (which is not melted manufacturing scrap) as reclaimed material, regardless whether the material originates from recycled or primary material. However, such material from pre-consumer phase, regardless its physical form, should be defined recycled, as long as it is fully traceable to its originating eligible recycled material. This is a closed loop of recycling material in the pre-consumer phase. Otherwise, recycling material, which is recovered in the pre-consumer phase will lose its recycling attribute unnecessarily. (ii) recycled: why waste from industrial products, including electrical and electronic equipment (WEEE), spent catalysts and fuel cells, is considered as pre-consumer if appliances have been used by consumers? For many direct stakeholders in the precious metals value chain, these industrial products, once end-of-life and if no production waste, are the key examples leading to post-consumer recycled materials. Hence, the EPMF does not understand RJC's proposal	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	See above response to comment 27

		to classify these products as recycled and not post-consumer recycled.		
47	See Question 2: Eligible Recycled and reclaimed Definition	No. It is not clear why separate terminology should be required for gold, silver or PGMs recovered from the jewellery and manufacturing process or from semi-processed or finished products that do not reach the consumer market but are returned to a refinery or other intermediate downstream processors. The distinction between the proposed terms recycled and reclaimed material is likely to be difficult to make and difficult to implement in practice, especially for smaller refineries. The advantages for the market and customers are not clear, as there is a risk of greenwashing.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	See above response to comment 27
48	See Question 2: Eligible Recycled and reclaimed Definition	The definition is clear	Anna Gibbs	See above response to comment 27

49	See Question 2: Eligible Recycled and reclaimed Definition	Illicit gold mined in the Amazon and elsewhere is frequently cast into jewelry and sold as “recycled” just days or weeks after extraction. This is a loophole that illicit actors across the globe have learned to exploit. The PMIF definitions of recycled and reprocessed do not leave this kind of room for ambiguity and subjectivity by making the dividing line between the two categories something that is measurable		See above response to comment 40
50	Question 3: Eligible Recycled and reclaimed Definition It is proposed that recycled and reclaimed materials can be mixed as long as the resultant material is described as a mix of recycled and reclaimed. Do you believe that this is sufficiently clear for customers and end-consumers?	Yes, IF the material is described as "recycled"	Philip Olden, CIBJO	Thank you for your feedback. We have noted feedback in relation to mixed sources and will incorporate this into the final definition together with requirements in relation to transparency to aid customers and end-consumers. This will be published once the final definition has completed its review and approval cycle.
51	See question 3: Eligible Recycled and reclaimed Definition	Agree they can be mixed, but they should both be called recycled		See above response to comment 27
52	See question 3: Eligible Recycled and reclaimed Definition	Yes	Pierre Laffite	See above response to comment 27
53	See question 3: Eligible Recycled and reclaimed Definition	No	Kandeep, Refinery	See above response to comment 27
54	See question 3: Eligible Recycled and reclaimed Definition	It makes more sense to focus on what 'mix' of inputs is valid for classifying (re)refined material that can be described as 'recycled gold'.	John Mulligan, World Gold Council & World Jewellery Confederation (CIBJO)	See above response to comment 27

55	See question 3: Eligible Recycled and reclaimed Definition	Could be mixed at the condition that they are both called RECYCLED	Gaetano Cavalieri, CIBJO	See above response to comment 50
56	See question 3: Eligible Recycled and reclaimed Definition	No, and will be very confusion and useless to the market	Jose Camino, Metalor Technologies	See above response to comment 50
57	See question 3: Eligible Recycled and reclaimed Definition	NO	Dean Johnston, D&M Jewellery Finishers Ltd	See above response to comment 50
58	See question 3: Eligible Recycled and reclaimed Definition	Yes but both are the same	Blake	See above response to comment 50
59	See question 3: Eligible Recycled and reclaimed Definition	clear for the industry, but no for the end customer	Lea Meheust, Hermes	See above response to comment 50
60	See question 3: Eligible Recycled and reclaimed Definition	Yes	Tobias, Schmiemann	See above response to comment 50
61	See question 3: Eligible Recycled and reclaimed Definition	Answer: No, the term reclaimed material will help to green-wash primary material as equal sustainable as recycling material.	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	Thank you for your feedback. We have noted feedback in relation to mixed sources and will incorporate this into the final definition taking into account the eligible source together with requirements in relation to transparency to aid customers and end-consumers . This will be published once the final definition has completed its review and approval cycle.

62	See question 3: Eligible Recycled and reclaimed Definition	No, the term reclaimed material will help to green-wash primary material as equal sustainable as recycling material.	S. Eitze, SAXONIA Holding GmbH	Thank you for your feedback. We have noted feedback in relation to mixed sources and will incorporate this into the final definition taking into account the eligible source together with requirements in relation to transparency to aid customers and end-consumers . This will be published once the final definition has completed its review and approval cycle.
63	See question 3: Eligible Recycled and reclaimed Definition	<p>The terms "recycled" and "reclaimed" are often used interchangeably but they actually have distinct meanings. Reclaimed materials refer to those that have been recovered from a waste stream, without undergoing the same processing as recycled materials. This similarity in terminology can create confusion for consumers, as a product described as containing a mix of recycled and reclaimed materials doesn't provide clear information about the source and treatment of those materials. To avoid ambiguity and potential greenwashing, it would be better to use the more precise terms "recycled" and "reprocessed" when describing the material composition. Stating the specific percentages of each type would give consumers a more accurate understanding of the environmental impacts and considerations. Simply labeling a product as containing a blend of recycled and reclaimed (or reprocessed) materials allows room for producers to emphasize the "recycled" aspect, even if the majority of the content is actually reprocessed. Clear, transparent disclosure is important for consumers to make informed choices.</p>		Thank you for your feedback. We have noted feedback in relation to mixed sources and will incorporate this into the final definition taking into account the eligible source together with requirements in relation to transparency to aid customers and end-consumers . This will be published once the final definition has completed its review and approval cycle.

64	See question 3: Eligible Recycled and reclaimed Definition	The words recycled and reclaimed are colloquially used rather interchangeably. Reclaimed also refers to materials that have been recovered from a waste stream, only the state of the material is unchanged like it is with recycling. This point alone would cause confusion for consumers because the words generally have almost the same meaning. Therefore, describing something as a mix of recycled and reclaimed doesn't give consumers sufficient information about the source of the material. The words used should be recycled and reprocessed and the percentage of each should be stated so that a product that is 90% reprocessed and 10% recycled isn't presented as having the same environmental impacts or considerations as a product that is 10% reprocessed and 90% recycled. Simply stating that there is a mix of the two allows for greenwashing by producers using mostly reprocessed materials.		Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition and will be adding more requirements around transparency and claims. This will be published once this has completed its review and approval cycle.
65	See question 3: Eligible Recycled and reclaimed Definition	Material described as a mix of recycled and reclaimed would be clear for end-consumers, provided that they would appropriately understand each of the terms, which I doubt is the case as of today. Taking into consideration the new category "reclaimed" will leave producing facilities and refiners with additional efforts for clearly distinguished declarations, understanding on consumer end will take much longer.	Anonymous	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition and will be adding more requirements around transparency and claims. This will be published once this has completed its review and approval cycle.
66	See question 3: Eligible Recycled and reclaimed Definition	The words might be clear, but it doesn't help with transparency.		Thank you for your feedback. We will be incorporating stronger requirements for transparency both in the standard and in the associated guidance which will also link to the new provisions in relation to claims in the COP.

67	See question 3: Eligible Recycled and reclaimed Definition	No, it allows to laundry gold's origin.	Andres Castellanos, Fairalloy	Thank you for your feedback. We have noted feedback in relation to mixed sources and will incorporate this into the final definition taking into account the eligible source together with requirements in relation to transparency to aid customers and end-consumers . This will be published once the final definition has completed its review and approval cycle.
68	See question 3: Eligible Recycled and reclaimed Definition	No, because neither 'recycled' nor 'reclaimed' are being used in a way consistent with popular or technical usage. Both refer to materials that have been used before and are destined for a waste stream. The words used should be recycled and reprocessed and the percentage of each should be stated so that a product that is 90% reprocessed and 10% recycled isn't presented as having the same environmental impacts or considerations as a product that is 10% reprocessed and 90% recycled. Simply stating that there is a mix of the two allows for greenwashing by producers using mostly reprocessed materials.		Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition and will be adding more requirements around transparency and claims. This will be published once this has completed its review and approval cycle.
69	See question 3: Eligible Recycled and reclaimed Definition	It is important to state that it can be mixed. Where possible we will try and keep the 2 streams separate in our refining process.	Tania Pelser, Metal Concentrators SA (Pty) Ltd	Thank you for your feedback.
70	See question 3: Eligible Recycled and reclaimed Definition	A mix of recycled and reclaimed: it is not questionable whether to mix or not. What is questionable how this mix was done – this requires clarification.	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	Thank you for your feedback this will be covered in the standards guidance.
71	See question 3: Eligible Recycled and reclaimed Definition	No. No. The proposal that recycled and reclaimed materials can be mixed, as long as the resulting material is described as a mixture of recycled and reclaimed material, makes the	York Alexander Tetzlaff, FVEM -	Thank you for your feedback. The point about investment material is clearly noted and RJC are not

		boundaries even more complicated and vulnerable. The industry's most important asset is the trust of customers and consumers. There would be a risk that the definitions, which cannot be clearly delineated, would lead to grading and categorisation in terms of sustainability and cause uncertainty. However, there is consensus that investment material cannot be categorised as recycling.	Fachvereinigung Edelmetalle e.V.	proposing to include investment material at this time. We have noted all the feedback in relation to mixing of materials and this will be taken into account in creating the final definition which will be published once this has gone through the review and approval cycle.
72	See question 3: Eligible Recycled and reclaimed Definition	Yes I believe this is clear - but again I do not think consumers will easily understand the difference between reclaimed and recycled	Anna Gibbs	Thank you for your feedback. We will be adding transparency requirement to support information for consumers and will be looking to create materials that can be easily shared to explain definitions.
73	Eligible Recycled and Reclaimed Language The word reclaimed has been proposed for now, based on discussions with the RJC standards committee. However, other suggestions received include Reprocessed; Repurposed; Remanufactured; Reconverted; Retreated. Do you believe the term reclaimed accurately represents the materials? If not, do you prefer one of the other “synonyms”, or can you	No. Just use "recycled". Anything else is potentially confusing and open to abuse	Philip Olden, CIBJO	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.

	propose an alternative that is more appropriate?			
74	See question Eligible Recycled and Reclaimed Language	No. We do not support different terms other than recycled' We propose further definitions of "recycled", e.g. "recycled from manufacturing waste"	Bullionvault	See above response to comment 73
75	See question Eligible Recycled and Reclaimed Language	No, use recycled as the explanation	Pierre Laffite	See above response to comment 73
76	See question Eligible Recycled and Reclaimed Language	No. Recycled is better for all cases	Kandeep, Refinery	See above response to comment 73
77	See question Eligible Recycled and Reclaimed Language	Effort should be directed towards contributing to cross-industry clarity on defining what is 'recycled gold'? Adding additional classifications and fragmented definitions is not helpful and risks creating unnecessary market schisms....	John Mulligan, World Gold Council & World Jewellery Confederation (CIBJO)	See above response to comment 73
78	See question Eligible Recycled and Reclaimed Language	NO. the only possible term is RECYCLED	Gaetano Cavalieri, CIBJO	See above response to comment 73
79	See question Eligible Recycled and Reclaimed Language	No, since it is not a matter of semantics. Metalor does not support that differentiation. Everything should be simply called recycled material	Jose Camino, Metalor Technologies	See above response to comment 73
80	See question Eligible Recycled and Reclaimed Language	ONLY RECLAIMED	Dean Johnston, D&M Jewellery Finishers Ltd	See above response to comment 73
81	See question Eligible Recycled and Reclaimed Language	No it's confusing		See above response to comment 73

82	See question Eligible Recycled and Reclaimed Language	Reprocessed or reclaimed	Lea Meheust, Hermes	See above response to comment 73
83	See question Eligible Recycled and Reclaimed Language	No. RJC should align to the ISO standard which refers to recycled material from pre- and post-consumer sources.	S. Eitze, SAXONIA Holding GmbH	See above response to comment 73
84	See question Eligible Recycled and Reclaimed Language	No, reclaimed is most often used to say that something has been recovered from a waste stream without its state being changed. Reclaimed could make sense for post-consumer diamonds but not precious metals. Reprocessed is the most accurately descriptive word for how precious metals are reused.		See above response to comment 73
85	See question Eligible Recycled and Reclaimed Language	Reclames should be appropriate	Tobias, Schmiemann	See above response to comment 73
86	See question Eligible Recycled and Reclaimed Language	Answer: No. RJC should align to the ISO standard which refers to recycled material from pre- and post-consumer sources.	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	See above response to comment 73
87	See question Eligible Recycled and Reclaimed Language	No. The term "reclaimed" is more accurately used to describe materials that have been recovered from a waste stream without undergoing significant processing or transformation. This distinction is important, as it differs from the way precious metals like gold and silver are reused in the jewelry industry. For precious metals, the more precise term would be "reprocessed" rather than "reclaimed." This better reflects how these materials are melted down, refined, and reformed into new jewelry pieces, without the original state of the metal being preserved. Using "reprocessed" instead of "reclaimed" when referring to precious metals helps provide clarity and avoids potential confusion for consumers. It ensures the terminology aligns with the actual processes involved in recovering and reusing these materials, rather than implying they have simply been "reclaimed" from waste streams. Maintaining transparency around the sourcing and processing of materials is crucial, especially when it comes		See above response to comment 73

		to sustainability claims in the jewelry industry. Precise, accurate language is key to giving consumers a clear understanding of a product's environmental impact and the circularity of its components.		
88	See question Eligible Recycled and Reclaimed Language	An alternative that is more appropriate would be pre-consumer, because it reflects pre- & post-consumer principle and is way more easier to comprehend by market outsiders and finally end-consumers. But, taking into consideration the advanced status of discussions and allegations brought along by CSOs/NGOs, this doesn't seem to be an appropriate term anymore. Looking at the other options: "Reprocessed" doesn't make sense, because it's the term used by PMIF in its proposed definition which is not accepted by the major part of the sector, so it would probably lead to confusion. "Repurposed" is not suitable because only part of eligible types of material didn't have a purpose before, right?! Technically speaking, most probably I would favour "retreated" out of the options above. However, probably none of the options would perfectly cover the scope.		See above response to comment 73
89	See question Eligible Recycled and Reclaimed Language	Reclaimed or repurposed. Although reclaimed is easier to spell and pronounce!	Alice Rochester, Harriet Kelsall Bespoke Jewellery	See above response to comment 73

90	See question Eligible Recycled and Reclaimed Language	The word reprocessed is clearer and more understandable.	Andres Castellanos, Fairalloy	See above response to comment 73
91	See question Eligible Recycled and Reclaimed Language	The proposed definition of "reclaimed" should be replaced with "reprocessed" for non-waste sources to avoid confusion with recycling.		See above response to comment 73
92	See question Eligible Recycled and Reclaimed Language	No. "Reclaimed" is in fact perceived as a synonym for "recycled", which should only apply to waste sources. Therefore, we oppose the proposed definition of "reclaimed" and request RJC to adopt a definition of "recycled" precious metals limited to waste materials, while referring to all other non-waste and non-mining sources as "reprocessed precious metals" (or some other name that does not imply recycling).	Boukje Theeuwes, Solidaridad	See above response to comment 73
93	See question Eligible Recycled and Reclaimed Language	We prefer the term repurposed.	Tania Pelsler, Metal Concentrators SA (Pty) Ltd	See above response to comment 73
94	See question Eligible Recycled and Reclaimed Language	For the time being the EPMF suggests to pay a special attention to the content of the definitions, which is still very confusing and vague. While deciding on wording/title for the definition it is advisable to check other standards (e.g. ISO) and regulations too, in order not to duplicate work and avoid any confusion.	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	See above response to comment 73

95	See question Eligible Recycled and Reclaimed Language	No. RJC should align to the ISO standard which refers to recycled material from pre- and post-consumer sources.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	See above response to comment 73
96	See question Eligible Recycled and Reclaimed Language	Secondary material	Anna Gibbs	See above response to comment 73
97	Question 1: Eligible Recycled and Reclaimed Provision Implementation. The standard has been revised to reflect the new proposed definition, and set the controls that would be required to be implemented by members. Is the reworded provision sufficiently clear on the requirements and conditions under which metals can be classed as recycled or reclaimed?	Yes, but see above	Philip Olden, CIBJO	Thank you for your feedback. We will be updating the standard and the guidance once the definition has been approved.
98	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	Yes, but note we do not support 'reclaimed'		See above response to comment 97

99	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	Yes	Pierre Laffite	See above response to comment 97
100	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	Yes	Kandeep, Refinery	See above response to comment 97
101	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	Requirements and conditions are clear but the terminology is not clear and inappropriate	Gaetano Cavalieri, CIBJO	See above response to comment 97
102	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	RECLAIMED ONLY	Dean Johnston, D&M Jewellery Finishers Ltd	See above response to comment 97
103	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	yes		See above response to comment 97
104	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	yes, but warning on jewellery scrap : only recycled from end user customers ; if it's from unsold or broken products should be considered as reclaimed/reprocessed gold	Lea Meheust, Hermes	Thank you for your feedback, The conditions under which items can be classed as pre or post consumer will be detailed further in the standards guidance.
105	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	No, as the standard does not differentiate manufacturing scrap from pre-consumer sources traceable to eligible recycled material from non-recycled material. The amount eligible recycled material will be significantly reduced.	S. Eitze, SAXONIA Holding GmbH	Thank you for your feedback. We have noted your concern, however the eligibility requirements for recycled material are not established based on influencing the amount of material in the market.
106	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	Answer: : No, as the standard does not differentiate manufacturing scrap from pre-consumer sources traceable to eligible recycled material from non-recycled material. The amount eligible recycled material will be significantly reduced.	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	Thank you for your feedback. We have noted your concern, but the eligibility requirements for recycled material are not established based on influencing

				the amount of material in the market.
107	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	<p>The core issue appears to be the lack of clarity around what constitutes "sufficient due diligence" to verify that jewelry materials are truly post-consumer. This ambiguity creates a potential loophole that could be exploited by unscrupulous actors. For example, newly mined gold could be cast into jewelry at the mining site and then sold into the "recycled" gold supply chain, undermining the integrity of sustainability claims. The definitions provided by the PMIF (Precious Metals Industry Foundation) for recycled and reprocessed materials seem to offer more objective, measurable criteria to address this concern. Establishing clear, quantifiable standards for differentiating between recycled and reprocessed materials is crucial. Without such definitions, there is room for subjectivity and potential greenwashing, which erodes consumer trust. This is especially important in industries like jewelry, where the sourcing and provenance of raw materials are significant sustainability considerations for many buyers. Implementing more rigorous, transparent traceability systems and aligning industry terminology with established guidance could help close these loopholes. Providing consumers with accurate, verifiable information is essential for making informed choices and driving meaningful progress on sustainability goals in the jewelry sector.</p>		Thank you for your feedback. We have noted your concerns in this regard and will be providing additional guidance on the required due diligence and expectations in relation to verifying the sources of any materials entering this supply chain.
108	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	Yes	Tobias, Schmiemann	See above response to comment 97

109	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	Requirements and provisions under which metals can be classed are basically clear. But it might lead to difficulties given the currently scarce description on the types of material within "reclaimed". It depends on the technical knowledge of the operator.		See above response to comment 97
110	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	How are you going to differentiate between "semi-processed or finished items that have not entered the consumer market" and "jewellery and ornaments that are no longer required/desired or can no longer be used for their original purpose"?	Alice Rochester, Harriet Kelsall Bespoke Jewellery	Thank you for your feedback. We will be providing more clarity on requirements in the standards guidance.
111	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	No, It is extremely risky.	Andres Castellanos, Fairalloy	Thank you for your feedback. We have received many divergent views on this topic and will be publishing a final definition once this has completed the review and approval cycle together with requirements in the standard and guidance to mitigate any risks of ineligible materials entering the supply chain.
112	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	No, for reasons stated above, with the exception of RJC's current category of "recycled waste," recycled and reclaimed are not being used correctly. The proposed definition of "reclaimed" should be replaced with "reprocessed" for non-waste sources to avoid confusion with recycling.		Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.

113	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	No, the reworded provision is not clear to classify what is recycled or reclaimed.	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.
114	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	No, as the proposed demarcation does not distinguish between production scrap from pre-consumer sources that can be traced back to authorised recycled material and non-recycled material. This would significantly reduce the amount of recyclates that can be considered. This would be at the expense of sustainability.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	Thank you for your feedback. We have noted your concern, but the eligibility requirements for recycled material are not established based on influencing the amount of material in the market.
115	See question 1: Eligible Recycled and Reclaimed Provision Implementation.	Yes	Anna Gibbs	See above response to comment 97
116	Question 2: Eligible Recycled and Reclaimed Provision Implementation. Are the controls sufficient to reduce the risk of ineligible materials entering the production flow?	Yes, if aligned with LBMA	Philip Olden, CIBJO	Thank you for your comment. We will be reviewing the standard guidance document to ensure that the controls can mitigate any risks of ineligible material entering this supply chain and will be maintaining our alignment to other standards.
117	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	Yes, as much as they can be		Thank you for your comment. We will be reviewing the standard guidance document to ensure that the controls can mitigate any risks of ineligible material entering this

				supply chain and will be maintaining our alignment to other standards.
118	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	Yes	Pierre Laffite	Thank you for your comment. We will be reviewing the standard guidance document to ensure that the controls can mitigate any risks of ineligible material entering this supply chain and will be maintaining our alignment to other standards.
119	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	Yes	Kandeep, Refinery	Thank you for your comment. We will be reviewing the standard guidance document to ensure that the controls can mitigate any risks of ineligible material entering this supply chain and will be maintaining our alignment to other standards.
120	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	as much as possible	Gaetano Cavalieri, CIBJO	Thank you for your comment. We will be reviewing the standard guidance document to ensure that the controls can mitigate any risks of ineligible material entering this supply chain and will be maintaining our alignment to other standards.
121	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	NO	Dean Johnston, D&M Jewellery Finishers Ltd	Thank you for your comment. We will be reviewing the standard guidance document to ensure that the controls can mitigate any risks of ineligible material entering this

				supply chain and will be maintaining our alignment to other standards.
122	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	Yes		Thank you for your comment. We will be reviewing the standard guidance document to ensure that the controls can mitigate any risks of ineligible material entering this supply chain and will be maintaining our alignment to other standards.
123	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	yes, but warning on jewellery scrap : only recycled from end user customers ; if it's from unsold or broken products should be considered as reclaimed/reprocessed gold	Lea Meheust, Hermes	Thank you for your feedback, The conditions under which items can be classed as pre or post consumer will be detailed further in the standards guidance.
124	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	No, the controls are not sufficient because the dividing line between the categories is not clear nor objective and measurable. Even if jewelry were to remain in the recycled category, it is unclear how exactly it could be ensured that jewelry is post-consumer.		Thank you for your feedback. We will be providing further clarity and controls in the guidance.
125	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	Hard to say, due to the variety of sub sources and processes	Tobias, Schmiemann	See above response to comment 124
126	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	Basically due diligence systems are responsible for ensuring the risk of ineligible materials.		See above response to comment 124

127	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	Not yet	Alice Rochester, Harriet Kelsall Bespoke Jewellery	See above response to comment 124
128	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	No, gold from Wagner group, Russia, Venezuela, DRC, etc can't easily get certified as RJC CoC	Andres Castellanos, Fairalloy	Thank you for your feedback. This consultation was in relation to recycled materials only but we will be looking at the controls in relation to mined gold both in the CoC and in the due diligence provisions in the COP.
129	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	No, the controls are not sufficient because the dividing line between the categories is not clear nor objective and measurable. Even if jewelry were to remain in the recycled category, it is unclear how exactly it could be ensured that jewelry is post-consumer, given the widespread practice of transforming newly mined gold into jewelry onsite.		See above response to comment 124
130	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	Definitions of recycled and reclaimed should not serve as a problem-solving principle in due diligence and responsible sourcing questions as they cannot cover all the due diligence risks involved.	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	Thank you for your feedback. We appreciate that the definition will not resolve due diligence issues but will be looking at the controls and due diligence for these particular eligible material streams to provide greater rigour.
131	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	The RJC CoC standard and the related independent third party audits should assure this.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	Thank you for your feedback.
132	See question 2: Eligible Recycled and Reclaimed Provision Implementation.	Yes	Anna Gibbs	Thank you for your feedback.

133	Question 3: Eligible Recycled and Reclaimed Provision Implementation. Are the controls sufficient to reduce the risk of misdescription of the material and finished products?	No, because of the use of multiple terms. Just use "recycled"	Philip Olden, CIBJO	Thank you for your feedback.
134	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	Yes, as much as they can be		Thank you for your feedback.
135	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	Yes	Pierre Laffite	Thank you for your feedback.
136	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	Yes	Kandeep, Refinery	Thank you for your feedback.
137	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	we do not believe so	Jose Camino, Metalor Technologies	Thank you for your feedback. We are reviewing the controls and claims requirements and guidance further.
138	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	NO	Dean Johnston, D&M Jewellery Finishers Ltd	Thank you for your feedback. We are reviewing the controls and claims requirements and guidance further.
139	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	Yes		Thank you for your feedback.
140	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	yes, but warning on jewellery scrap : only recycled from end user customers ; if it's from unsold or broken products should be considered as reclaimed/reprocessed gold	Lea Meheust, Hermes	Thank you for your feedback. We are reviewing the controls and claims requirements and guidance further.

141	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	No, as 5.4 is imprecisely in terms of “scrap” or “waste” which can be either recycleable or reclaimable by this definition.	S. Eitze, SAXONIA Holding GmbH	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.
142	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	No, if the final claim can be “mix of recycled and reclaimed” but the percentage of recycled materials does not need to be disclosed, this could lead to a misrepresentation of the material if the percentage is actually very small.		Thank you for your feedback. We are reviewing the final wording of the definition and how to strengthen transparency.
143	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	If a product is simply labeled as containing a "mix of recycled and reclaimed" materials, without requiring the specific percentages to be disclosed, this could lead to a misrepresentation of the actual composition. Even if a small fraction of the materials are recycled, the product could still be marketed as having recycled content, when the majority may actually be reclaimed or reprocessed. This lack of transparency would undermine the integrity of sustainability claims and prevent consumers from making fully informed choices. To avoid such potential greenwashing, it would be important to mandate the disclosure of the precise percentages of recycled, reclaimed, and/or reprocessed materials used. This level of detail would give consumers a clear understanding of the true environmental impact and circularity of the product's components. Establishing clear, standardized labeling requirements that include the specific breakdown of material sources is crucial. Anything short of that runs the risk of allowing producers to emphasize the recycled aspect, even if it represents a relatively small portion of the overall composition. Transparency and accountability should be the guiding principles to ensure sustainability claims are		Thank you for your feedback. We are reviewing the final wording of the definition and how to strengthen transparency.

		accurate and meaningful for environmentally-conscious consumers.		
144	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	For most of the materials yes	Tobias, Schmiemann	Thank you for your feedback
145	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	I believe controls are sufficient, provided that definitions are understood.		Thank you for your feedback
146	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	I believe they will reduce the risk, but not eliminate it entirely.	Alice Rochester, Harriet Kelsall Bespoke Jewellery	Thank you for your feedback. We are reviewing the final wording of the definition and how to strengthen transparency.

147	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	No, if the final claim can be “mix of recycled and reclaimed” but the percentage of recycled materials does not need to be disclosed, this could lead to a misrepresentation of the material if the percentage is actually very small. The recycling of e-waste, if done responsibly, can legitimately reduce planetary GHG emissions. If what is currently called ‘post-consumer recycled’ and ‘recycled waste’ can be mixed and declared as one category, then neither the public nor the company will benefit from engaging in the actual waste recycling. We suggest that products made from recycled waste material are presented transparently, disclosing the mix of sources when combined with high-grade post or pre-consumer material. This will prevent greenwashing and encourage investments in carbon reduction efforts throughout the supply chain.		Thank you for your feedback. We are reviewing the final wording of the definition and how to strengthen transparency.
148	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	It is problematic when the RJC CoC speaks imprecisely of ‘scrap’ or ‘waste’, which according to the proposed definition can be either recyclable or recoverable.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.
149	See question 3: Eligible Recycled and Reclaimed Provision Implementation.	This is a constant battle with too many variables to apply to the general public	Anna Gibbs	Thank you for your feedback. We are reviewing the final wording of the definition and how to strengthen transparency and will be looking to create materials that can be used in a consumer-facing environment

150	Transition to new recycled and reclaimed terminology. With a change in the definition of recycled and reclaimed metals, existing stock under the current CoC definition that is no longer eligible under the new definition, will need to be renamed to 'reclaimed' (if eligible). What is a reasonable timeframe to enable this transition and why?	N/A, because the definition "reclaimed" will not be supported by the gold supply chain		Thank you for your feedback
151	See question on Transition to new recycled and reclaimed terminology.	Do not use different terms		Thank you for your feedback
152	See question on Transition to new recycled and reclaimed terminology.	yes because the description should be RECYCLED	Gaetano Cavalieri, CIBJO	Thank you for your feedback
153	See question on Transition to new recycled and reclaimed terminology.	we do not support such change	Jose Camino, Metalor Technologies	Thank you for your feedback
154	See question on Transition to new recycled and reclaimed terminology.	ONLY RECLAIMED	Dean Johnston, D&M Jewellery Finishers Ltd	Thank you for your feedback
155	See question on Transition to new recycled and reclaimed terminology.	Immediately		Thank you for your feedback
156	See question on Transition to new recycled and reclaimed terminology.	yes reclaimed on existing stock ; maybe 3 years (time of the recertification cycle)	Lea Meheust, Hermes	Thank you for your feedback

157	See question on Transition to new recycled and reclaimed terminology.	1 year		Thank you for your feedback
158	See question on Transition to new recycled and reclaimed terminology.	1 year		Thank you for your feedback
159	See question on Transition to new recycled and reclaimed terminology.	Answer: No, as 5.4 is imprecisely in terms of “scrap” or “waste” which can be either recycleable or reclaimable by this definition.	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	Thank you for your feedback
160	See question on Transition to new recycled and reclaimed terminology.	I would assume step by step approach is the most appropriate, i.e. renaming of existing stock would become mandatory after official start of implementation of CoC revision.		Thank you for your feedback
161	See question on Transition to new recycled and reclaimed terminology.	6 months to a year - enough time to sell through some stock and make new under the new terminology. Anything unsold can be renamed.	Alice Rochester, Harriet Kelsall Bespoke Jewellery	Thank you for your feedback
162	See question on Transition to new recycled and reclaimed terminology.	6 months will be reasonable.	Tania Pelser, Metal Concentrators SA (Pty) Ltd	Thank you for your feedback
163	See question on Transition to new recycled and reclaimed terminology.	Current definitions are rather causing difficulties to understand not only to stakeholder groups but also customers and consumers what recycled and reclaimed is. Only once the definitions are clarified we can discuss timeframe.	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	Thank you for your feedback
164	See question on Transition to new recycled and reclaimed terminology.	6 months to a year if education is widely spread about the change, why it matters, and why the consumer should understand the difference	Anna Gibbs	Thank you for your feedback
165	Question 1: Guidance Is further guidance required on the appropriate description of recycled and reclaimed materials, particularly for the end consumer?	There should be the opportunity to describe "recycled" in more detail if desired/needed - e.g. "recycled from electronic waste"	Philip Olden, CIBJO	Thank you for your feedback

166	See question 1: Guidance	Use recycled only, same as LBMA	Pierre Laffite	Thank you for your feedback
167	See question 1: Guidance	NO!	Gaetano Cavalieri, CIBJO	Thank you for your feedback
168	See question 1: Guidance	yes, clear description with examples, type of language use for the end customer ; and careful about the translations	Lea Meheust, Hermes	Thank you for your comment. We will look to create materials that can be used in a consumer facing environment, together with potential training materials for members to use with employees, particularly to help smaller organisations manage any transitions.
169	See question 1: Guidance	Yes, reclaimed material as this current draft of the standard wants it to be defined is a misleading material description, as the end consumer is not familiar with the differences to true recycling material and will assume that reclaimed material is as good and as sustainable as recycled material.	S. Eitze, SAXONIA Holding GmbH	See above response to comment 168
170	See question 1: Guidance	Yes, particularly if the term “reclaimed” is the one used rather than “reprocessed”. It would be much more clear that recycled and reprocessed mean different things as these terms are not commonly used interchangeably like recycled and reclaimed are.		See above response to comment 168
171	See question 1: Guidance	Yes. The terms "recycled" and "reclaimed" are often used interchangeably in casual conversation, whereas "reprocessed" has a more distinct and technical meaning. This could create ambiguity, even if the specific percentages are provided. Requiring the use of "reprocessed" rather than "reclaimed" when referring to precious metals that have been recovered and reformed, but not necessarily diverted from the waste stream, would help draw a clearer distinction. This terminology aligns better with established industry definitions and guidance. Providing consumers with a transparent breakdown of the recycled, reprocessed, and any other material components, using precise and well-defined terms, is crucial. This level of detail		See above response to comment 168

		empowers consumers to make informed choices and avoids the potential for misrepresentation or greenwashing. Consistency in language and alignment with industry standards should be the priority, to ensure sustainability claims are meaningful and build trust with environmentally-conscious consumers.		
172	See question 1: Guidance	Answer: Yes, reclaimed material as this current draft of the standard wants it to be defined is a misleading material description, as the end consumer is not familiar with the differences to true recycling material and will assume that reclaimed material is as good and as sustainable as recycled material.	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	See above response to comment 168
173	See question 1: Guidance	Not for the consumer but probably within the supply chain	Tobias, Schmiemann	See above response to comment 168
174	See question 1: Guidance	Further guidance is definitely required in order to reach a certain amount of knowledge on consumer end.		Thank you for your feedback. We are conducting a thorough review of the guidance document and will provide more detail for all elements in relation to this provision.
175	See question 1: Guidance	yes	Alice Rochester, Harriet Kelsall Bespoke Jewellery	Thank you for your feedback. We are conducting a thorough review of the guidance document and will provide more detail for all elements in relation to this provision.
176	See question 1: Guidance	No, this information is fraudulent and confuses the consumer.	Andres Castellanos, Fairalloy	Thank you for your feedback.

177	See question 1: Guidance	Yes	Tania Pelser, Metal Concentrators SA (Pty) Ltd	See above response to comment 175
178	See question 1: Guidance	Current definitions are rather causing difficulties to understand not only to stakeholder groups but also customers and consumers what recycled and reclaimed is. Only once the definitions are clarified we can discuss whether there is any need for additional information/guidance in the CoC.	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	Thank you for your feedback
179	See question 1: Guidance	Yes, "reclaimed" material, as it is to be defined in this draft standard, is a misleading material description as the end user is not familiar with the differences to recycled material.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	Thank you for your feedback. Once the final definition has completed the review cycle we will review the associated guidance and will also be preparing consumer facing materials.
180	See question 1: Guidance	The description is accurate with the distinct bifurcation of pre and post consumer	Anna Gibbs	Thank you for your feedback
181	Question 2: Guidance Is there any additional information you feel is needed in the CoC guidance to provide further clarity on recycled and reclaimed requirements?	See above - we do not support "reclaimed"	Philip Olden, CIBJO	Thank you for your feedback
182	See question 2: Guidance	If needed, companies should be able to be more specific, eg 'recycled from estate jewellery'. See above, the only consumer terms should be 'recycled'		Thank you for your feedback
183	See question 2: Guidance	Use the term recycled, same as LBMA	Kandeep, Refinery	Thank you for your feedback
184	See question 2: Guidance	No, just change the terminology	Gaetano Cavalieri, CIBJO	Thank you for your feedback
185	See question 2: Guidance	JUST USING RECLAIMED	Dean Johnston, D&M Jewellery Finishers Ltd	Thank you for your feedback
186	See question 2: Guidance	No, recycled is sufficient		Thank you for your feedback

187	See question 2: Guidance	yes, clear description with examples, type of language use for the end customer ; and careful about the translations	Lea Meheust, Hermes	Thank you for your feedback. Once the final definition has completed the review cycle we will review the associated guidance and will also be preparing consumer facing materials.
188	See question 2: Guidance	Do not use reclaimed material as category to cover all materials sourced from pre-consumer (manufacturing) waste streams. Material from pre-consumer source that are fully traceable from eligible recycled material should be defined as recycled material as well.	S. Eitze, SAXONIA Holding GmbH	Thank you for your feedback. Once the final definition has completed the review cycle we will review the associated guidance and will also be preparing consumer facing materials.
189	See question 2: Guidance	Yes, if jewelry remains in the recycled category, how would the difference between post-consumer jewelry and jewelry never owned by a consumer be discerned?		See above response to comment 168
190	See question 2: Guidance	yes. If jewelry is categorized as "recycled," there would need to be a clear way to differentiate between post-consumer jewelry and jewelry that has never been owned by a consumer. Without a robust system to verify the origin and previous ownership of jewelry materials, there is potential for newly mined gold or other precious metals to be cast into jewelry and then sold as "recycled." This would undermine the integrity of the recycled claim and mislead consumers. Establishing objective, measurable criteria to distinguish post-consumer jewelry from other sources is crucial. This could involve traceability mechanisms, third-party audits, or other controls to ensure the recycled jewelry materials can be definitively traced back to previous consumer use. Simply categorizing all jewelry as "recycled" without this level of verification creates a loophole that could be exploited. Consumers deserve transparency about the true provenance of the materials in the products they purchase, especially when it comes to sustainability claims. Addressing this ambiguity around the definition and verification of "recycled"		Thank you for your feedback. We are conducting a thorough review of the guidance document and will provide more detail for all elements in relation to this provision. Our focus is to ensure that there is sufficient due diligence and rigor in any materials coming into the eligible recycled materials stream.

		jewelry should be a priority. Implementing clear, standardized processes will be essential to build trust and prevent potential greenwashing in the jewelry industry.		
191	See question 2: Guidance	Answer: Do not use reclaimed material as category to cover all materials sourced from pre-consumer (manufacturing) waste streams. Material from pre-consumer source that are fully traceable from eligible recycled material should be defined as recycled material as well.	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	Thank you for your feedback.
192	See question 2: Guidance	There is additional information needed on the technical level regarding eligible materials.		Thank you for your feedback.
193	See question 2: Guidance	Yes	Alice Rochester, Harriet Kelsall Bespoke Jewellery	Thank you for your feedback.
194	See question 2: Guidance	No	Tania Pelsler, Metal Concentrators SA (Pty) Ltd	Thank you for your feedback.
195	See question 2: Guidance	Do not use reclaimed material as category to cover all materials sourced from pre-consumer (manufacturing) waste streams. Material from pre-consumer source that are fully traceable from eligible recycled material should be defined as recycled material as well.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	Thank you for your feedback.
196	See question 2: Guidance	Reclaimed may have to be a category that has some fluidity	Anna Gibbs	Thank you for your feedback.

197	Category guidance. Is there any additional information you feel is needed in the CoC guidance to provide further clarity on the eligibility of CoC material to be included in the new recycled and reclaimed category?	Alignment with LBMA standards	Philip Olden, CIBJO	Thank you for your comment. Our cross-recognition with LBMA and other programmes is important to us and has been a consideration in our decision-making. However, there is a need to continue to move the Standard forward and increase transparency which we will continue to strive for.
198	See question on Category guidance.	How to differentiate investment products from gold used in the manufacturing sector		Thank you for your feedback. We will look to provide further clarity on this.
199	See question on Category guidance.	HUGE MORE	Dean Johnston, D&M Jewellery Finishers Ltd	Thank you for your feedback. Once the final definition has completed the review cycle we will review the associated guidance and will also be preparing consumer facing materials.
200	See question on Category guidance.	make the list of examples as exhaustive as possible (no grey area)	Lea Meheust, Hermes	Thank you for your feedback. This will be considered for the guidance document, which will be developed with the standards committee.
201	See question on Category guidance.	Material from pre-consumer source that are fully traceable from eligible recycled material should be included in the recycled material category as well.	S. Eitze, SAXONIA Holding GmbH	Thank you for your feedback
202	See question on Category guidance.	Answer: Material from pre-consumer source that are fully traceable from eligible recycled material should be included in the recycled material category as well.	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	Thank you for your feedback
203	See question on Category guidance.	The more examples you can add the easier it will be understood	Alice Rochester, Harriet Kelsall Bespoke Jewellery	Thank you for your feedback

204	See question on Category guidance.	Again the definition is fraudulent, I suggest you check the email from andres.castellanos@fairlloy.eco	Andres Castellanos, Fairalloy	Thank you for your feedback. We have noted the contents of the email and have taken this into consideration in our deliberations. The final definition will be published once this has gone through the review and approval process.
205	See question on Category guidance.	Regarding reclaimed: application of the reclaimed definition as stated in the RJC table on page 3 (https://www.responsiblejewellery.com/wp-content/uploads/RJC-CoC-Review-Round-3-Draft-Definition.pdf) is missing materials, such as (i) jewellery from the distribution chain, and (ii) high-grade manufacturing scrap.	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	Thank you for your feedback. We will ensure all materials are captured.
206	See question on Category guidance.	Material from pre-consumer source that are fully traceable from eligible recycled material should be included in the recycled material category as well.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	Thank you for your feedback
207	See question on Category guidance.	No	Anna Gibbs	Thank you for your feedback
208	Question: Annex The Annex has been updated to reflect the eligible recycled and reclaimed categories. What further changes or additions, if any, are required to the Annex to provide clarity?	No	Philip Olden, CIBJO	Thank you for your feedback
209	See question on the Annex.	YES	Dean Johnston, D&M Jewellery Finishers Ltd	Thank you for your feedback
210	See question on the Annex.	Do not add a new category		Thank you for your feedback

211	See question on the Annex.	should be in 1 page ; and easy to automate	Lea Meheust, Hermes	Thank you for your feedback. The template covers all options, but users can use their own format if easier as long as all data is captured and any redundant elements can be omitted.
212	See question on the Annex.	Material from pre-consumer source that are fully traceable from eligible recycled material should be defined as recycled material as well.	S. Eitze, SAXONIA Holding GmbH	Thank you for your feedback
213	See question on the Annex.	Answer: Material from pre-consumer source that are fully traceable from eligible recycled material should be defined as recycled material as well.	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	Thank you for your feedback
214	See question on the Annex.	Within the section for Sub-Contracting Declaration and the listed processes a further "Other" option would maybe be beneficial to have the possibility to describe another processing step.		Thank you for your feedback
215	See question on the Annex.	Material from pre-consumer source that are fully traceable from eligible recycled material should be defined as recycled material as well.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	Thank you for your feedback
216	See question on the Annex.	The consumer may not want to quickly understand the difference between recycled and reclaimed when making a purchase in the market place. I believe, the term reclaimed may cause confusion	Anna Gibbs	Thank you for your feedback. The transfer document is only used in a B2B context but we will look at how claims can be made simply for consumers.
217	General comment	To ensure a coherent and consistent approach to responsible sourcing and material flows, it is advisable that the jewellery industry (including the RJC and its members) strive to reach collaborative and convergent definitions and classifications. Any imposition of additional definitions which risk fragmenting the sector and confusing the consumers (and stakeholders across the value chain) should be avoided.	John Mulligan, World Gold Council & World Jewellery Confederation (CIBJO)	Thank you for your feedback. We have noted the very divergent views from stakeholders responding to this consultation and will strive to align where possible.

218	General comment	Please see my separate email to David and Melanie	Gaetano Cavalieri, CIBJO	Thank you for your feedback
219	General comment	Do not add a new category		Thank you for your feedback
220	General comment	General - The term “Reclaimed” is not common sense and is not helpful to differentiate primary material from recycled material when reclaimed in pre-consumer sources. The CoC should emphasis the identification of material made from eligible recycled material throughout the whole value chain. That would include recycling material that is accrued in the pre-consumer stage e.g. as waste in the manufacturing while processing material made from eligible recycled material.	S. Eitze, SAXONIA Holding GmbH	Thank you for your feedback
221	General comment	Answer: General - The term “Reclaimed” is not common sense and is not helpful to differentiate primary material from recycled material when reclaimed in pre-consumer sources. The CoC should emphasis the identification of material made from eligible recycled material throughout the whole value chain. That would include recycling material that is accrued in the pre-consumer stage e.g. as waste in the manufacturing while processing material made from eligible recycled material.	Stefan Helmling, WIELAND Edelmetalle GmbH, Germany	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.
222	General comment	RJC should ensure to have their members trained on new requirements.		Thank you for your feedback. The RJC will be developing a communications and training programme to support the launch of the new standard.
223	General comment	General - the link at the beginning of this form did not take us directly to the standards and changes that were being proposed, and they were difficult to find to refer to.	Alice Rochester, Harriet Kelsall Bespoke Jewellery	Thank you for the feedback - we will look at this aspect for future consultations.

224	General comment	General - Please note that answers to questions 4 (sector) and 7 (materials) are technically limited to one criterion only. It is NOT possible to answer with multiple choice. Agosi's answer to 4 should include "Precious Metal Refiner, Hedger, Trader" + "Other: Producer of semi-finished precious metals products"; Agosi's answer to 7 should include "Gold" + "Platinum Group Metals (PGM)" + "Silver"		Thank you for the feedback - we will look at this aspect for future consultations.
225	General comment	General - Please refer to the Open Letter dd 12 April 2024 from ARM supported by 11 other CSOs - including Solidaridad - as additional feedback related to this consultation on the definition of recycled. This open letter explains in more details the risks of greenwashing related to a definition that is not aligned with legal definitions and public expectations on "recycled". The sources of the arguments can be found in the open letter. Link: https://www.responsiblemines.org/en/2024/04/advocating-for-transparent-practices-in-the-gold-industry-redefining-recycled-gold/	Boukje Theeuwes, Solidaridad	Thank you for your feedback. We have noted the contents of the letter and have taken this into consideration in our deliberations. The final definition will be published once this has gone through the review and approval process.
226	General comment	General - with regards to tailings. We are sourcing material from tailings processors but they also have mined material in their sourcing profile. Do we have to visit each site that they are sourcing from? Does the supplier need to split the stream into ? 1. A tailing stream and a mined stream? This will be a problem since they combine all the gold in their electrowinning cell.	Tania Pelser, Metal Concentrators SA (Pty) Ltd	Thank you for your feedback. Further information in the guidance will be included to support and answer scenarios such as this. This question has been passed to the training team for further clarification.
227	General comment	The term "Reclaimed" is not common sense and is not helpful to differentiate primary material from recycled material when reclaimed in pre-consumer sources. The CoC should emphasize the identification of material made from eligible recycled material throughout the whole value chain. That would include recycling material that is accrued in the pre-consumer stage e.g. as waste in the manufacturing while processing material made from eligible recycled material.	York Alexander Tetzlaff, FVEM - Fachvereinigung Edelmetalle e.V.	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.

228	General comment	<p>As is the RJC, Brilliant Earth is invested in the RJC COC's definition of recycled materials because we utilize the RJC COC and associated material transfer records to verify recycled gold and silver purchases from by our manufacturers.</p> <p>While we participate in the Precious Metals Impact Forum (PMIF) and recognize the importance of their work, we do not agree with the PMIF's definition of recycled gold.</p> <p>We commend the RJC for not accepting 'freshly mined material including tailings and any wastes and byproducts of mining operations' and 'partially-refined products with a direct mining origin.' This would add to consumer confusion and the dilution of the definition of 'recycled' precious metals.</p> <p>We are not opposed to investment materials being excluded as a source of eligible recycled material. Nor are we opposed to the definition of 'reclaimed' precious metals as show here:</p> <p>Gold, silver or PGM derived from jewellery and manufacturing process or from semi-processed or finished items that have not entered the consumer market but are returned to a refiner or other downstream intermediate processor to begin a new life cycle as "reclaimed gold, silver or PGM."</p> <p>But for both the exclusion of investment materials and the segregation of 'reclaimed' precious metals, the impact on refiners should be considered.</p> <p>In the case of investment materials, we would like to understand how this exclusion will impact volumes of COC certified recycled materials from the refiners who currently hold RJC COC certification for recycled gold.</p>	Allison Charlambous, Brilliant Earth	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>In relation to investment material the exclusion of this material is already in place in the current version of the standard so there would not be any impact on current members or volumes.</p> <p>We have received feedback from a number of refiners from different geographies and have considered all feedback in our deliberations.</p>
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		<p>In the case of 'reclaimed' precious metals, the 'reclaimed' category will impact the certifications of refiners that exclusively refine recycled materials, and will require segregated collection and processing of 'reclaimed' materials</p>		
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229	General comment	<p>Pre-consumer Melted manufactured gold scrap being artificially labeled as waste to use the word recycled for marketing purposes is fraud.</p> <p>The following materials are not the same and must be clearly distinguished:</p> <ul style="list-style-type: none"> - Electronic Waste (low-grade gold-containing objects): The collection, logistical sorting, and processing of these sources demand significant effort and specialized machinery. Typically, tons of electronic waste must be processed to recover a few grams of gold. Crucially, these items have been legally classified as waste and were discarded by their original owners, who cannot directly reclaim their value. This process represents authentic gold recycling from electronic waste. - High Value Material (high-grade gold-containing objects): This category encompasses old jewelry and ornaments previously owned by individuals who exchanged them at pawn shops or through cash-for-gold schemes. It's crucial to note that these items are never discarded or are considered waste and retain significant economic worth. Hence, labeling high-grade gold-containing objects as waste is illogical. Furthermore, extracting gold from these high-grade items is relatively straightforward, as simple refining techniques suffice for their recovery compared to lower-grade counterparts. <p>https://www.youtube.com/watch?v=QrYfBa9Sxs8</p> <p>A suitable term for post-consumer high-grade gold-containing objects is Reprocessed gold as this name does not mislead consumers into thinking this gold came from a waste stream.</p> <p>Attempting to classify these two sources under the recycled gold umbrella is misleading because their characteristics vastly differ. It's akin to comparing bananas to apples — they're fundamentally distinct.</p>	Andres Castellanos, Fairalloy	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.
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		<p>There should be two categories of reprocessed gold one labeled pre-consumer reprocessed gold and the other should be post-consumer reprocessed gold</p> <p>Pre consumer: Melted manufactured gold scrap that under no circumstances could be considered waste due to its high economic value. Referring to casting tree remnants, each holding an average gold value of \$10,000, as waste is a fraud. Major jewelry manufacturers generate up to 20 casting trees daily, totaling \$200,000 in gold value per day and a staggering \$4 million per month of gold dubbed as waste.</p> <p>Post consumer: Objects containing high-grade gold, like used jewelry and coins, cannot be legally categorized as waste since they retain significant value and are never discarded by their owners under any circumstances.</p> <p>It must be explicitly defined in the CoC Standard that the origin of high-value post-consumer material is the individual seller. Pawnshops and cash-for-gold shops should be audited by the standard considering they are the riskiest part of the supply chain. It is a fraud to declare that the origin of this material is the gold collector or the refinery.</p> <p>A comprehensive audit of the entire supply chain is essential, particularly focusing on the most vulnerable segments. This is paramount for high-value post-consumer materials, demanding solid documentation and evidence, especially within risky transaction points involving individual sellers, pawn shops, or cash-for-gold schemes.</p>		
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		<p>The ambiguous definition of "Reasonable determination of the origin" in section 5.4 is extremely risky regarding the concealment of the true origin, which could be illicit mineral extraction in Russia, Venezuela, or the Democratic Republic of the Congo. According to this definition, with a simple document anyone could legitimize gold from the worst sources as recycled gold and be certified by the RJC CoC.</p> <p>In conclusion:</p> <p>Recycled gold :The recycled gold term should be used exclusively for low-grade gold-containing objects such as electronic waste.</p> <p>Reprocessed gold: Post-consumer high-grade gold-containing items can't legally be classified as waste since their owners never discard or view them as such. Consequently, the term "recycled" becomes impractical to apply. A more suitable term is post-consumer reprocessed gold.</p> <p>Pre-consumer high-grade gold can't legally be classified as waste since its owners never discard or view them as such. the term "recycled" becomes impractical to apply. A more suitable term is pre-consumer reprocessed gold.</p> <p>The use of the term "reprocessed" doesn't give final consumers the impression that their gold was sourced from waste materials, thereby avoiding any misconceptions about its recyclability.</p> <p>These two sources of gold are entirely distinct and must be handled differently; attempting to equate them is deceitful and fraudulent.</p>		
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230	General comment	<p>1. As a whole, I find, that it would be appropriate, if RJC could come up with an altogether new phrase to use, when so many find it absolutely necessary to add an adjective to the gold to try to capture the clients interest with an origin, that is unknown. As we all know, gold and other precious metals have never been wasted by purpose. Therefore, as the value is the same, old as new, when not from a certified mine, I find that the RJC would do their members and the whole industry a huge favor in introducing a whole new term, or simply use the name of the metal without any further adjectives. Think about it! We don't need to fool our clients by making unrealistic claims! However, if RJC finds it impossible to do so, I suggest</p> <p>2. Definition of "recycled": The proposed definition is not consistent with existing international, legal, and normative definitions of recycling, which are based on waste material. I request RJC to adopt a definition that aligns with these standards, limiting the term "recycled" to waste material and referring to other non-waste sources as "reprocessed precious metals."</p> <p>3. Definition of 'reclaimed': The proposed definition of "reclaimed" should be "reprocessed precious metals" for non-waste sources to avoid confusion with recycling.</p> <p>4. Product declaration: I suggest that products made from recycled waste material are presented transparently, disclosing the mix of sources when combined with high-grade post or pre-consumer material. This will prevent greenwashing and encourage investments in carbon reduction efforts throughout the supply chain.</p> <p>5. I urge, RJC to instruct its members not to use misleading terms when describing the use of reprocessed precious metals to their clients. I have come across explanations such as no child-labour and of course most commonly, ethical. When the origin and source of the gold is unknown, none of these claims can be made.</p>	<p>Anna Moltke- Huitfeldt, Anna Moltke-Huitfeldt, Jewellery in Life</p>	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation to claims are being added into the Code of Practices standard with new provisions in relation to claims.</p>
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231	General comment	<p>1. Definition of "recycled": The proposed definition is not consistent with existing international, legal, and normative definitions of recycling, which are based on waste material. I request <i>RJC to adopt a definition that aligns with these standards, limiting the term "recycled" to waste material and referring to other non-waste sources as "reprocessed precious metals."</i></p> <p>2. Definition of 'reclaimed': <i>The proposed definition of "reclaimed" should be "reprocessed precious metals" for non-waste sources to avoid confusion with recycling.</i></p> <p>3. Product declaration: <i>I suggest that products made from recycled waste material are presented transparently, disclosing the mix of sources when combined with high-grade post or pre-consumer material. This will prevent greenwashing and encourage investments in carbon reduction efforts throughout the supply chain.</i></p>	Anne Waha, Anne Waha Fine Jewellery	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation to claims are being added into the Code of Practices standard with new provisions in relation to claims.</p>
232	General comment	<p>1. Definition of "recycled": The proposed definition is not consistent with existing international, legal, and normative definitions of recycling, which are based on waste material. I request <i>RJC to adopt a definition that aligns with these standards, limiting the term "recycled" to waste material and referring to other non-waste sources as "reprocessed precious metals."</i></p> <p>2. Definition of 'reclaimed': <i>The proposed definition of "reclaimed" should be "reprocessed precious metals" for non-waste sources to avoid confusion with recycling.</i></p> <p>3. Product declaration: <i>I suggest that products made from recycled waste material are presented transparently, disclosing the mix of sources when combined with high-grade post or pre-consumer material. This will prevent greenwashing and encourage investments in carbon reduction efforts throughout the supply chain.</i></p>	Erin Daily, Brooklyn metal Works	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation to claims are being added into the Code of Practices standard with new provisions in relation to claims.</p>
233	General comment	<p>1. Definition of "recycled": The proposed definition is not consistent with existing international, legal, and normative definitions of recycling, which are based on waste material. I</p>	Cristina Echavarria, Independent specialist	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to</p>

		<p>request <i>RJC</i> to adopt a definition that aligns with these standards, limiting the term "recycled" to waste material and referring to other non-waste sources as "reprocessed precious metals."</p> <p>2. Definition of 'reclaimed': The proposed definition of "reclaimed" should be "reprocessed precious metals" for non-waste sources to avoid confusion with recycling.</p> <p>3. Product declaration: I suggest that products made from recycled waste material are presented transparently, disclosing the mix of sources when combined with high-grade post or pre-consumer material. This will prevent greenwashing and encourage investments in carbon reduction efforts throughout the supply chain.</p>	on mining communities and ASM	<p>nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation to claims are being added into the Code of Practices standard with new provisions in relation to claims.</p>
234	General comment	<p>Our recommendation to keep the RJC standards transparent and robust, when it comes to name gold that has already been processed previously, is to call it REPROCESSED. Calling it "recycled" is not precise and leads to consumer misinformation. "Recycled" by definition is to reintroduce in a supply chain a material that has been previously discarded because it loses its economical value. Gold keeps its value and is an asset no matter how many times it has been processed. We invite you to go further: RJC standards should strengthen the due diligence both for mined gold and for reprocessed gold, requiring traceability to the origin and the certificate of origin. Unfortunately, illicit extract gold gets to the commercial markets and is sold as legal gold because of the loopholes in the traceability of the supply chain. The excuse for a strong due diligence is that gold from different origins gets melted together. Well... Let's start speaking about single origin certified gold.</p>	Ana Sierra, Moda Elan	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation to claims are being added into the Code of Practices standard with new provisions in relation to claims.</p>
235	General comment	<p>1. Definition of "recycled": The proposed definition is not consistent with existing international, legal, and normative definitions of recycling, which are based on waste material. I request <i>RJC</i> to adopt a definition that aligns with these standards, limiting the term "recycled" to waste material and referring to</p>	Francesc Picanyol Ballester, Majoral	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this</p>

		<p><i>other non-waste sources as "reprocessed precious metals."</i></p> <p><i>2. Definition of 'reclaimed': The proposed definition of "reclaimed" should be "reprocessed precious metals" for non-waste sources to avoid confusion with recycling.</i></p> <p><i>3. Product declaration: I suggest that products made from recycled waste material are presented transparently, disclosing the mix of sources when combined with high-grade post or pre-consumer material. This will prevent greenwashing and encourage investments in carbon reduction efforts throughout the supply chain.</i></p>		<p>into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation to claims are being added into the Code of Practices standard with new provisions in relation to claims.</p>
236	General comment	<p>I am extremely concerned about the continued disruption to ecologically sensitive regions of the world, particularly the Amazon River Basin because of the illicit gold mining occurring there. As measures to halt the rampant destruction of previously undisturbed rainforest are undertaken, I understand that various legal definitions are under review. I have listed below three of my main concerns:</p> <p>1. Definition of "recycled": The proposed definition is not consistent with existing international, legal, and normative definitions of recycling, which are based on waste material. I request RJC to adopt a definition that aligns with these standards, limiting the term "recycled" to waste material and referring to other non-waste sources as "reprocessed precious metals."</p> <p>2. Definition of 'reclaimed': The proposed definition of "reclaimed" should be "reprocessed precious metals" for non-waste sources to avoid confusion with recycling.</p> <p>3. Product declaration: I suggest that products made from recycled waste material are presented transparently, disclosing the mix of sources when combined with high-grade post or pre-consumer material. This will prevent greenwashing and encourage investments in carbon reduction efforts throughout the supply chain.</p> <p>Please consider these essential settings to the applied legal</p>	Michael DesRosiers, Amazon Aid Foundation	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation to claims are being added into the Code of Practices standard with new provisions in relation to claims.</p>

		language to prevent the evasion of the protective laws put in place to safeguard the environment. Words matter here more than ever!		
237	General comment	<p>1. Definition of "recycled": The proposed definition is not consistent with existing international, legal, and normative definitions of recycling, which are based on waste material. I request RJC to adopt a definition that aligns with these standards, limiting the term "recycled" to waste material and referring to other non-waste sources as "reprocessed precious metals. » Additionally, in France, we have a fiscal law that taxes the consumers at the moment of selling their old precious metals. When a consumer sells a piece of jewellery, he/her is exonerated from taxes as long as the value of each jewel is lower to 5000eur. If it is above 5000eur, the piece is taxed @ 6,5% (</p> <p>2. Definition of 'reclaimed': The proposed definition of "reclaimed" should be "reprocessed precious metals" for non-waste sources to avoid confusion with recycling.</p> <p>3. Product declaration: I suggest that products made from recycled waste material are presented transparently, disclosing the mix of sources when combined with high-grade post or pre-consumer material. This will prevent greenwashing and encourage investments in carbon reduction efforts throughout the supply chain.</p> <p>In addition, in France which constitutes 20% of your CoC certified members, we have a tax law that taxes consumers when they sell their old precious metals materials that we think is incompatible with your proposed definition. It is important to note that old jewellery is the main source of 'recycled' gold as defined by the current RJC CoC standards. It is estimated that the French have between 1,500 and 2,000 tonnes of gold in their jewellery box.</p>	Patrick Shein, Gold by Gold	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation to claims are being added into the Code of Practices standard with new provisions in relation to claims.</p>

		<p>The tax, called the 'Flat Rate Tax on Precious Metals' (FTPO), treats a high-grade precious metal object differently, whether it is a jewel or another precious metal object such as scrap jewellery or a coin, with an incidence on the tax level.</p> <p>A gold jewel is taxed at a rate of 6.5% only if its value exceeds €5000, whereas the same jewel, if sold in a scrap form, is taxed at a rate of 11.5% from its first euro value.</p> <p>Today, most old jewellery in France is sold to pawnshops, jewellers or aggregators as jewellery and not as scrap, and is therefore exempt from FTPO if its unit value is below €5000, so in the end much less taxed than if in a form of scrap or waste. If your definition is adopted with the qualifier "reclaimed" or "recycled" specifically for post-consumer products, it would create a risky tax situation between a material sold and taxed as jewellery by the consumer, when the real intention of the buyer is to reprocess it and call it "recycled/reclaimed" gold once refined, as legally in France, recycled gold can only come from waste sources. This risk would disappear if the gold were called 'reprocessed', for example after refining.</p>		
238	General comment	<ol style="list-style-type: none"> 1. Definition of "recycled": The proposed definition is not consistent with existing international, legal, and normative definitions of recycling, which are based on waste material. I request RJC to adopt a definition that aligns with these standards, limiting the term "recycled" to waste material and referring to other non-waste sources as "reprocessed precious metals." 2. Definition of 'reclaimed': The proposed definition of "reclaimed" should be "reprocessed precious metals" for non-waste sources to avoid confusion with recycling. 3. Product declaration: I suggest that products made from recycled waste material are presented transparently, disclosing 	Roby McGonigle, Lebrusan Studio	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation</p>

		the mix of sources when combined with high-grade post or pre-consumer material. This will prevent greenwashing and encourage investments in carbon reduction efforts throughout the supply chain.		to claims are being added into the Code of Practices standard with new provisions in relation to claims.
239	General comment	<p>I am writing in respect to the recent letter https://www.responsiblemines.org/en/2024/04/advocating-for-transparent-practices-in-the-gold-industry-redefining-recycled-gold/</p> <p>What I want to highlight here is the fact that a number of jurisdictions such as Hong Kong receive Gold from places like the Philippines where it's smuggled into the country and washed through jewellery manufacturers. Similarly, China exports new jewellery from Shenzhen to Hong Kong then melts it down as a form of money transfer out of China. The 3rd largest manufacturer has an export licence for \$50m per day across the border. The manufacturers pay to a commodity trading company as they are not regulated who then on pays to the Chinese individual moving his money offshore!</p> <p>Singapore receives Jungle Jewellery in the form of Bangles via Brinks where it's turned into refined gold, up to 2.5 tons can be shipped out daily. I wrote about it in this post https://seasia-consulting.com/bullion-bank-indonesia/</p> <p>In all these cases its considered scrap gold when being washed and layers into the gold system with enough distance between themselves and the LBMA approved refineries for it to pass, the LBMA has been recently made aware of this by myself and others.</p> <p>Brazilian rainforest gold is now going via Venezuela before being sold into the US where jewellery companies wash the gold selling into refineries. https://seasia-consulting.com/venezuela-gold-rush-as-us-sanctions-lifted/</p>	Spencer Campbell, SE Asia Consulting Pte Ltd	Thank you for your feedback. We will be developing increased guidance in relation to the Chain of Custody Standard to strengthen the rigour of due diligence being undertaken.

240	General comment	<p>The European Precious Metals Federation (EPMF) appreciates RJC work on CoC Standard and opportunity to provide comments to the 3rd round of consultation that focuses on definition of recycled. In the 2nd round of consultation, the EPMF has already emphasized the need to incorporate the concept of pre- and post- consumer. This concept is of paramount importance as it allows to differentiate (e.g. for jewellery) between (i) material available for recycling after being used by consumers and (ii) material coming from industrial production processes which can be put back into the system (e.g. scrap materials, filter dust) and never reached any consumer, as well that pre-consumer includes materials from industrial production up to mining (e.g. carbon spent).</p> <p>Currently, the RJC proposes to define: Recycled:Gold, silver or PGM derived from:</p> <ul style="list-style-type: none"> • high value post-consumer precious metal products, such as jewellery and ornaments that are no longer required/desired or can no longer be used for their original purpose; • low grade scrap and other such materials from the manufacturing process such as floor sweepings and pollution control materials; • melted manufacturing scrap fully traceable to eligible recycled material; <p>waste from industrial products including electrical and electronic equipment, or industrial components such as spent catalysts and fuel cells;</p> <ul style="list-style-type: none"> • investment materials are excluded. <p>The RJC also proposes to add a new category:</p> <ul style="list-style-type: none"> ➤ Reclaimed (other options: Reprocessed; Repurposed; Remanufactured; Reconverted; Retreated). Gold, silver or PGM derived from the jewellery and manufacturing process 	Zinaida Nazarenko, European Precious Metals Federation (EPMF)	<p>Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.</p> <p>Increased requirements in relation to claims are being added into the Code of Practices standard with new provisions in relation to claims.</p>
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		<p>or from semi-processed or finished items that have not entered the consumer market but are returned to a refiner or other downstream intermediate processor to begin a new life cycle as “reclaimed gold, silver or PGM”.</p> <p>The EPMF would like to stress that both definitions: recycled and reclaimed, have a quite wide and broad interpretation. Hence, the EPMF would like to ask for more clarity on:</p> <ul style="list-style-type: none">- reclaimed: requires clarifications as the definition already exists under ISO 14021 with a different meaning. It is confusing to have same word/definition but with a different meaning;- for gold, silver and PGM coming from jewellery: what form is considered? E.g. scraps, residues, or others?- reclaimed: does RJC definition consider all grades of scrap: low-grade and high-grade form?- reclaimed: need for clear material sources, is reclaimed coming from the pre-consumer?- reclaimed: RJC proposes to define recovered materials coming from the pre-consumer phase (which is not melted manufacturing scrap) as reclaimed material, regardless whether the material originates from recycled or primary material. However, such material from pre-consumer phase, regardless its physical form, should be defined recycled, as long as it is fully traceable to its originating eligible recycled material. This is a closed loop of recycling material in the pre-consumer phase. Otherwise, recycling material, which is recovered in the pre-consumer phase will lose its recycling attribute unnecessarily.- recycled: why waste from industrial products, including electrical and electronic equipment (WEEE), spent catalysts and fuel cells, is considered as pre-consumer if appliances have been used by consumers? For many direct stakeholders in the precious metals value chain, these		
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		<p>industrial products, once end-of-life and if no production waste, are the key examples leading to post-consumer recycled materials. Hence, the EPMF does not understand RJC's proposal to classify these products as recycled and not post-consumer recycled.</p> <ul style="list-style-type: none">- a mix of recycled and reclaimed: it is not questionable whether to mix or not. What is questionable how this mix was done – this requires clarification.- requirements and conditions for classification: recycled or reclaimed: not clear as well, needs to be better defined.- reclaimed: application of the reclaimed definition as stated in the RJC table is missing materials, such as (i) jewellery from the distribution chain, and (ii) high-grade manufacturing scrap.- risk of ineligible materials: definitions of recycled and reclaimed should not serve as a problem-solving principle in due diligence and responsible sourcing questions as they cannot cover all the due diligence risks involved. <p>To conclude, current definitions are rather causing difficulties to understand not only to stakeholder groups but also customers and consumers what recycled and reclaimed is. Only once the definitions are clarified we can discuss timeframe and whether there is any need for additional information/guidance in the CoC.</p>		
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241	General comment	<p>As we commented during the 2nd consultation, we still think the ISO definition should be the reference to ensure consistency within the industry.</p> <p>However, if certification schemes like RJC aim to be more stringent, we think this should be done while keeping the spirit and the vocabulary of the ISO definition. This would also simplify the definition and give the detailed table more clarity.</p> <p>In that sense, we suggest:</p> <ul style="list-style-type: none"> • Having the same generic vocabulary for post-consumer/pre-consumer/ waste-recycled precious metals • Low-grade: changing it to “low precious metal content” following the ISO discussion at Vicenza • Using the same wording as ISO to list the materials from which the precious metals are recovered • We also suggest clearly distinguishing between recycled precious metals and materials from which those metals are recovered (i.e recycled/reclaimed gold sources). <p>The following changes in the types of sources would be needed to ensure alignment with ISO pre-and post-consumer definitions:</p> <ul style="list-style-type: none"> • Manufacturing scraps, either melted or not, fall into the pre-consumer section. • Excess inventory of finished products never proposed for sale falls into the pre-consumer section • Excess inventory of finished products at the retail/ wholesale stage falls into the post-consumer section <p>Therefore, we propose the following definitions</p> <p>OPTION 1 – OUR PREFERRED OPTION IN CASE ISO DEFINITION IS REJECTED AS IT IS</p> <p>As:</p> <ul style="list-style-type: none"> • Introducing a new word such as “reclaimed” is seen to have no regulatory existence at EU or 	Joelle Ponelle, Richemont	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.
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		<p>UN or ISO levels and some say will bring confusion in the regulatory context,</p> <ul style="list-style-type: none">• The definition of the new term could potentially clash with current conflict with current legislative developments, particularly in Europe (e.g. the new directive 2024/825).• Translating the new term into other languages could be challenging, and the consequences are not yet clear• “Recycled” is the only wording currently understandable by consumers. We suggest using only the wording “recycled”, but systematically followed by the mandatory precision of the pre-consumer origin, if any. <p>This would result in the following categories:</p> <p>Recycled Gold, silver or PGM derived from:</p> <ul style="list-style-type: none">• high precious metal content post-consumer products that are no longer required/desired or can no longer be used for their original purpose;• low precious metal content wastes, either pre- or post-consumer <p>Note: investment materials are excluded from this category.</p> <p>Where:</p> <ul style="list-style-type: none">• Post-consumer products are products sourced from individuals, organizations, or industrial facilities in their role as end-users of the products that are no longer required/ desired, or can no longer be used for their original purpose. <p>This includes excess inventory returned by wholesalers and retailers “End-user” can be any organization in the supply chain returning the product or component, except the manufacturer.</p> <ul style="list-style-type: none">• Low precious metal content wastes are low gold/ silver/ PGM content materials generated by organizations or industrial facilities <p>This includes pre- and post-consumer (*) materials and returns of products</p>		
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		<p>Recycled from pre-consumer *</p> <p>Gold, silver, or PGM derived from:</p> <ul style="list-style-type: none">• High precious metal content pre-consumer materials <p>Where:</p> <ul style="list-style-type: none">• Pre-consumer materials are materials generated during a manufacturing process that are no longer required, or that can no longer be used for their original purpose <p>Note: freshly mined material, including tailings and any wastes and by-products of mining operations are excluded from this section, as are partially-refined products with a direct mining origin other than low-grade scrap and other such materials such as floor sweepings and pollution control materials which are included under recycled above</p> <p>(*) The current text in the consultation only mentions pre-consumer, which is not correct</p> <p>OPTION 2 -IF DECISION IS TO INTRODUCE A NEW WORDING LIKE "RECLAIMED"</p> <p>Same as option 1, "recycled from pre-consumer" being replaced by "reclaimed"</p>		
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242	General comment	<p>These statements are in response to your proposed exclusion of Investment Material in the definition of “Recycled” gold:</p> <ul style="list-style-type: none"> • Not all investment material is derived directly from mines. How does the RJC intend to prove their origin; or is the RJC making the decision that all gold investment bars are likely “greenwashed.” For example, our investment bars are created from 100% recycled gold. We are COMEX approved for delivery. Will these bars be permitted to be called “recycled” under this new scheme? • Once the useful purpose of an investment product has been achieved and redeemed for monies, it should be permitted to be recycled by a refiner for “repurposing” into a new life cycle. If the concern about 400oz. London Good Delivery bars is so great, limit the permissible investment bar size to 100 oz. or lower. • In that vein, UPMR believes coins and small bars (e.g., 10 oz. ingots) should be included in the definition of recycled. Many of these coins/bars have been held by collectors/savers and have been held for many years. These coins/bars are dishoarded after an inheritance or estate sale. How can these pieces, held for many years, not considered as filling a life cycle? Why must a refining lot of estate jewelry and coins be broken down into separate lots for processing? • The refining of precious metals (even investment bars) is necessary for the effective use of gold in the creation of jewelry, electronic components, dental scrap, etc. The process removes certain elements and upgrades the purity of gold to make it into a useable material. Does not this type of “transformation” of gold into a useful consumer product benefit the marketplace by utilizing less gold material from the mining sector? • There is simply not enough recycled material to meet the market’s demand. Therefore, the market will slowly become rife with fraud and deception, destroying the primary reason it is being proposed. In addition, the scarcity of recycled gold will force 	Mike Mikolay, United Precious Metal Refining, Inc	Thank you for your feedback. The inclusion of investment material is not part of this current consultation but we have noted your comments for future consideration.
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		<p>premiums on this material higher. This will impact both the retailer and the manufacturer, who will bear the increased costs.</p> <ul style="list-style-type: none"> • The true definition of the word “Recycled” is being used in the wrong context. Recycled does not mean waste. Somehow this has got convoluted to fit certain individuals’ missions to fit their narrative. Recycled simply means that some material is being utilized for another lifecycle (e.g. plastic bottles are “recycled” to make more bottles). The use of the word “waste” is the true misnomer. • If you recycle anything, what it truly means is “You erase it’s memory” from one product to another. You have also changed it chemically in the process. This is what refiners do with gold; we take an object (e.g. jewelry or investment bar) and change it, transform it, repurpose it to another product that has a use for industry or for personal use. 		
243	General comment	<p>1) On the definition of "recycled": The proposed ‘recycled’ definition is not consistent with the legal and normative definitions of a recycled material. EU countries, the UK and Switzerland, where most gold and other precious metals are traded or refined, define recycling as the reprocessing of waste material and then define waste as discarded material. The US defines recycling as the processing of materials that would otherwise be thrown away as trash. The UNEP Basel Convention has the same definition of 'waste' as the EU directive on waste and 191 countries have explicitly agreed to be bound by it.</p> <p>The International Organization for Standardization (ISO) 14021</p>	Marcin Piersiak, Alliance for Responsible Mining	Thank you for your feedback. We have noted the strong opinions generated in relation to nomenclature from participants in the consultation and will take this into account in the final definition which will be published once this has completed its review and approval cycle.

		<p>norm on self-declared environmental claims, defines recycled material and waste in line with the above references. The future norm ISO 59014 on environmental management and circular economy, sustainability and traceability of secondary materials defines a waste as ‘a resource that is considered to no longer be an asset as it, at the time, provides no value to the holder’.</p> <p>Therefore, we oppose the proposed definition of "recycled" as misleading and request RJC to adopt a definition of "recycled" precious metals that is consistent with existing international, legal and normative definitions of recycling, which can only be based on waste.</p> <p>The term "recycled precious metal" needs to be limited to waste material, with all other non-waste and non-mining sources referred to as " reprocessed precious metal" (or some other name that does not imply recycling). We recommend the adoption of a definition that maintains this clear distinction, such as the one collaboratively developed by the Precious Metals Impact Forum (PMIF) through a multi-stakeholder dialogue.</p> <p>2) On the definition of 'reclaimed': The Oxford Dictionary defines "reclaim" as: "to recover materials from waste products so that they can be used again." Wiktionary defines "reclaim" as: "to obtain useful products from waste; to recycle." "Reclaimed" is in fact perceived as a synonym for "recycled", which should only apply to waste sources.</p> <p>Therefore, we oppose the proposed definition of "reclaimed" and request RJC to adopt a definition of "recycled" precious metals</p>		
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		<p>limited to waste materials, while referring to all other non-waste and non-mining sources as "reprocessed precious metals" (or some other name that does not imply recycling).</p> <p>3) On "Product declaration": In line with previous arguments, to ensure transparency and maintain consumer confidence, only products made from recycled waste should be allowed to be marketed as "recycled". Where recycled waste material is mixed with high quality post or pre-consumer material, such as old jewelry or casting trees, this should be transparently presented to consumers as a mix of sources. This will incentivize companies that want to build their strategies on "recycled" claims to make efforts to incorporate post-consumer waste and avoid landfilling it, which is what consumers expect from recycled material.</p> <p>It should also prevent companies from making near-zero carbon claims by re-melting high-grade gold products without having to consider their full life cycle by classifying them as "recycled". This in turn would incentivize companies to make innovative investments in carbon reduction efforts in their supply chains throughout the entire life cycle, which will have a real impact on carbon reduction. This is an opportunity for the jewellery sector to have a significant positive impact on its global carbon footprint and contribute to achieving carbon reduction targets.</p> <p>As an additional feedback related to this consultation, ARM together with 12 major civil has submitted an open letter, that explains in more details the risks of greenwashing related to a definition that is not aligned with legal definitions and public expectations on "recycled".</p> <p>The sources of the arguments can be found in the open letter.</p>		
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244	General comment	<p>We note RJC's comment that this definition may need to be revised to recognise any '<i>major changes that arise as the ISO definition and other Standards undergo their revision.</i>' However, we note that some of the suggested amendments have already deviated from the proposed ISO definition, some of which we have referenced below. As such, we would query the rationale behind these, if the intention is to recognise changes from the ISO definition (and other standards) going forward.</p> <p>1. Recycled definition The definition refers to 'high value post-consumer precious metal products.....' Will there be any additional guidance/threshold as to what constitutes 'high value'? Without this the definition could lack clarity. Further, we note the difference between the ISO proposal, which does not make this same distinction.</p> <p>2. New 'Reclaimed' category We note the inclusion of a new category, outside of the current ISO typology, currently called 'Reclaimed'. The current ISO definition makes the distinction between pre- and post-consumer recycled gold and the proposed 'reclaimed' definition, broadly covers the products that fall within the post-consumer category (i.e., manufacturing and production scrap). Therefore, we would query the rationale for the inclusion of this new category.</p> <p>Under the current ISO proposal, 'expressing a recycled content for gold is not allowed, which means that gold has to be 100% recycled gold to be called "recycled gold"; when that content is higher than 0% but lower than 100% such gold is called "mixed gold". This would not be the case under the RJC proposal, where "Reclaimed & recycled mix must be declared as such e.g. "mix of reclaimed and recycled" i.e., there will be another difference in how this material is categorised.</p>	Amardeep Rihal, LBMA	Thank you for your feedback. We have received many divergent views on the definition of recycled gold and have taken these all into account in our deliberations. The final definition will be published once the review and approval cycle is completed. There will also be additional guidance to support any new requirements and ensure rigorous due diligence.
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