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RJC Code of Practices Review - Comment Report on Round 3 Consultation

A summary of comments received on the Public Summary document of the COP Review.

Purpose

In 2021, RJC started the process of updating the Responsible Jewellery Council (RJC) Code of Practices (COP) 2019 standard. The review covers the full standard, with key focus areas feeding in from the recent consultations on the update to the 2019 standard. This includes topics such as greenhouse gas emissions, diversity equity and inclusion, water, natural resources, mining provisions, grievance mechanisms and more. The round 3 public consultation opened in April 2024 for 60 days and closed in June 2024. The purpose of this document is to share comments received during the 3rd round of consultation.

Comments

Our consultation on the public summary was carried out through sharing on social channels, newsletters and an email campaign using the full RJC stakeholder list (over 2,300 recipients), with updates and proposed revisions posted to our website. Recipients include RJC members, audit firms, NGOs, industry press, trade associations, and government representatives. In response, we received over 100 submissions.

Table 1 in this document has each of the individual comments received during the consultation. We greatly appreciate the time and insightful contributions from the submitters.

Next steps

These comments, in conjunction with internal research are being used to update the 2019 COP. The RJC team and Standards Committee will be reviewing proposed changes in order to create a finalised updated COP. Inquiries around the standard and standard setting process are welcome: Please contact

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Table 1 – Comments on the Code of Practices Standard from Round 3

These comments were received between April and June 2024.

	Question	Comment	Stakeholder	RJC response
1.	Management systems The RJC have added an additional provision under COP 2 to require members to have management systems in place to appropriately and effectively implement the requirements of the COP. This would be consistent with the CoC standard. Do you have any feedback on this change?	The change is comprehensible and makes sense.	Eduard Stefanescu, C. Hafner GmbH + Co. KG	Thanks for your comment response.
2.	See question on management systems	OK	Lea Meheust, Hermes	Thanks for your comment response.
3.	See question on management systems	Change approved	Joelle Ponnelle, Richemont	Thanks for your comment response.
4.	See question on management systems	No	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
5.	See question on management systems		Anonymous	Thanks for your comment response.
6.	See question on management systems	We agree	Jessica Dos Santos, Garaude	Thanks for your comment response.
7.	See question on management systems	Positive although has a risk to double or to multiply centers of decisions and actions	Anonymous	Thanks for your comment response.
8.	See question on management systems	Begins to resemble ISO9001 formal requirements more and more, but is ok	Anonymous	Thanks for your comment response.
9.	See question on management systems	The change implemented is fine	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.

10.	Grievance system The RJC have added an additional provision under COP 2 to require members to have an effective grievance mechanism in place. Requirements for specific focused grievance mechanisms are included under different COP provisions (such as due diligence, human rights, stakeholder engagement etc) where necessary, and will now refer back this new provision. Do you have any feedback on this change?	No particular comments, but agreement.	Eduard Stefanescu, C. Hafner GmbH + Co. KG	Thanks for your comment response.
11.	see question on grievance mechanism	OK	Lea Meheust, Hermes	Thanks for your comment response.
12.	see question on grievance mechanism	Change approved	Joelle Ponnelle, Richemont	Thanks for your comment response.
13.	see question on grievance mechanism	No	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
14.	see question on grievance mechanism	No	Anonymous	Thanks for your comment response.
15.	see question on grievance mechanism	We agree, we are already doing it	Jessica Dos Santos, Garaude	Thanks for your comment response.
16.	see question on grievance mechanism	Already in place since the first certification and it is effective , free to address a third party with no passage from the company	Anonymous	Thanks for your comment response.
17.	see question on grievance mechanism	More elaborate, but doable	Anonymous	Thanks for your comment response.
18.	see question on grievance mechanism	Specific mention should be made to grievance mechanisms in COP 28 to ensure that stakeholders affected by water and natural capital are heard (see comments below).	Charlie Espinosa, Amazon Aid	Members are required to have a company wide grievance mechanism as part of COP 2. Members are also required to identify impacted stakeholders and to engage and collaborate with these stakeholders.
19.	see question on grievance mechanism	The implementation carried out is good.	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.

20.	Claims The RJC have expanded COP 14 to include claims more broadly (in addition to Provenance claims), to ensure any claims that RJC members make are truthful, evidenced and not misleading. Do you have any feedback on this change?	Basically, I do agree with the amendments, but we should take into consideration that claims accompanied by independent third-party reviews shouldn't be subject to further discussion with NGOs etc.	Eduard Stefanescu, C. Hafner GmbH + Co. KG	The new claims section aims to give stakeholders confidence that claims being made by RJC members have a transparent and robust system behind them.
21.	See question on claims	OK	Lea Meheust, Hermes	Thanks for your comment response.
22.	See question on claims	Claims should be aligned with Directive (EU) 2024/825 and the potential regulation on Green Claims of the EU Commission	Aarón Pita, SASMAT RETAIL S.L.	Noted. 14.2a has been revised to ensure claims meet applicable laws such as the EU directives. The EU Directive 2024/825 shall be referenced in the Guidance. The RJC remains aware of current and upcoming legislation and will update the standards where applicable and necessary.
23.	See question on claims	14.3.a: To reduce room for interpretation, we propose "claims must be truthful, clear and transparent" 14.3.c: If claims are only checked during audits, it can happen that false claims are proclaimed over a long period of time. Accordingly, we would suggest that a service be set up by RJC where claims can be checked for conformity 14.4: This should be underlined with examples in the guidance. Otherwise, it is not clear what environmental or sustainability claims mean	Joelle Ponnelle, Richemont	All claims must be truthful as per 14.2a. However, transparency included in 14.3b and connected with the evidence. Further, members are required to inform the RJC when a provenance claim has changed outside of the audit process. Examples will be included in the guidance.
24.	See question on claims	No	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
25.	See question on claims	No	Anonymous	Thanks for your comment response.
26.	See question on claims	We agree	Jessica Dos Santos, Garaude	Thanks for your comment response.
27.	See question on claims	Positive	Anonymous	Thanks for your comment response.
28.	See question on claims	Sensible expansion	Anonymous	Thanks for your comment response.

29.	See question on claims	It is ok	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.
30.	1. Water and emissions The RJC have expanded the provision on wastes and emissions (COP 27), to provide more specific requirements around greenhouse gas emissions and energy use. Do you have any feedback on the changes?	Taking into consideration provision 27.5 a. with the requirement to set a 3-year rolling GHG and energy plan...I doubt most of the members will be able to do so. Have RJC had the chance to enquire about the percentage of their members performing GHG accounting at this point in time? Can't improve what is not measured!	Eduard Stefanescu, C. Hafner GmbH + Co. KG	COP 27.5 only applies to members with significant emissions. Guidance information about significance will support the implementation of this requirement. Many of the large Members are already reporting GHG emissions.
31.	See question 1 on Water and emissions	27.3. There is a need to define how to identify significant greenhouse gas emissions and the scope of such emissions. Otherwise members will establish different methodologies that will not allow for a homogeneous comparison, resulting in members opting for less demanding methodologies in order not to address the requirements of 27.5 and its sub-requirements. 27.3.b There are costs associated with verification which can be quite high for small or medium sized enterprises. It is recommended to define what type of members should carry out the verification (perhaps according to company size and production processes) and what would be its scope.	Aarón Pita, SASMAT RETAIL S.L.	Thanks for your comment. Guidance information will support the implementation of this requirement. This includes methodologies to be used and the determination of significance. Verification of GHG emissions, energy usage, and reduction targets is for Members with significant emissions.
32.	See question 1 on Water and emissions	OK	Lea Meheust, Hermes	Thanks for your comment response.
33.	See question 1 on Water and emissions	Change approved	Joelle Ponnelle, Richemont	Thanks for your comment response.
34.	See question 1 on Water and emissions	No	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
35.	See question 1 on Water and emissions	No	Anonymous	Thanks for your comment response.
36.	See question 1 on Water and emissions	we agree even if it difficult to us to measure our gas emissions	Jessica Dos Santos, Garaude	Thanks for your comment response.

37.	See question 1 on Water and emissions	Positive we are implementing ISO 14001 just to add the correct evaluation of our GHG and take measures to decrease	Anonymous	Thanks for your comment response.
38.	See question 1 on Water and emissions	No definition what amount of greenhouse gas emissions are considered "significant"	Anonymous	Guidance information about significance will support the implementation of this requirement.
39.	See question 1 on Water and emissions	<p>27.4 All members, not just mines and processors, should transition within a reasonable timeline towards reporting Scope 3 emissions to ensure that emissions are not outsourced to undisclosed and, often, under resourced suppliers.</p> <p>27.5 – The word “significant” lacks specificity and leaves room for evasion of responsibility.</p> <p>27.6 Emissions reporting for members with mining or mineral processing facilities should include land-use emissions, as deforestation accounts for a significant and frequently ignored portion of mining emissions, as well as negative biodiversity impacts.</p> <p>28.2 C Specific mention should be made to grievance mechanisms here to ensure that stakeholders affected by water use are heard. Furthermore, water use impacts assessed in 28.2 b should be clearly communicated to stakeholders that may be affected. Members should not continue with operations until affected stakeholders agree to a water use plan.</p>	Charlie Espinosa, Amazon Aid	<p>COP 27.4: As this is a new Provision, the RJC and Standards Committee agreed to apply the scope 3 requirements to members with mining and/or mineral processing operations as these operations constitute the bulk of the GHG emissions from in the supply chain. However, it is intended to expand this requirement to other parts of the supply chain in future revisions of the COP.</p> <p>COP 27.5: Guidance information about significance will support the implementation of this requirement.</p> <p>COP 27.6: Thanks, this can be included in the supporting Guidance for this provision.</p> <p>28.2 C: under the new COP 2.6 members are required to have an accessible rights-compatible grievance mechanism in place for all stakeholders to raise grievances.</p> <p>28.2 b: members are required to annually publicly report company water withdrawal and efficiency including outcomes arising from COP 28.2a-c, in line with COP 3 (Reporting). Further, at this stage, the COP requirements Members to implement practices that avoid or minimise significant adverse impacts and have these practices independently verified, where agreed responsible and sustainable land use cannot be achieved.</p>
40.	See question 1 on Water and emissions	Change is okay	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.
41.	See question 1 on Water and emissions	Yes, the changes definitely align with existing frameworks.	Eduard Stefanescu, C. Hafner GmbH + Co. KG	Thanks for your comment response.
42.	See question 1 on Water and emissions	OK	Lea Meheust, Hermes	Thanks for your comment response.
43.	See question 1 on Water and emissions	YES	Joelle Ponnelle, Richemont	Thanks for your comment response.

44.	See question 1 on Water and emissions	Yes	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
45.	See question 1 on Water and emissions	No	Anonymous	Thanks for your comment response.
46.	See question 1 on Water and emissions	Yes	Jessica Dos Santos, Garaude	Thanks for your comment response.
47.	See question 1 on Water and emissions	Yes	Anonymous	Thanks for your comment response.
48.	See question 1 on Water and emissions	If they line up	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.
49.	2. Do you find these provisions sufficiently cover the necessary requirements regarding data collection, monitoring and reporting?	I believe that requirements written in provision 27 Greenhouse gas and energy, surpass current capacities of most of the members. Just think about small shops and boutiques!	Eduard Stefanescu, C. Hafner GmbH + Co. KG	The requirements in COP 27 and COP 28 are structured such that the level of action is based on the significance of the impacts associated with the Member's operations. This is to allow for smaller Members to implement. Guidance information about significance will support the implementation of this requirement.
50.	See question 2 on Water and emissions	OK	Lea Meheust, Hermes	Thanks for your comment response.
51.	See question 2 on Water and emissions	COP 27.3: "national framework or target" are subject to interpretation about how a company can meet them. This is too vague to be part of the standard. We suggest to stick to the legislation => Work towards using renewable energy in alignment with national frameworks, targets and/or legislation.	Joelle Ponnelle, Richemont	There are some countries that have not mandated take up of renewable energy through legislation but provide a voluntary framework with incentives. The wording is to allow for these situations.
52.	See question 2 on Water and emissions	Yes	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
53.	See question 2 on Water and emissions	No	Anonymous	Thanks for your comment response.
54.	See question 2 on Water and emissions	Yes	Jessica Dos Santos, Garaude	Thanks for your comment response.

55.	See question 2 on Water and emissions	Yes point is that we cannot build a double record ,one for you one for ISO , we will go with one and that course of action must be	Anonymous	Thanks for your comment response.
56.	See question 2 on Water and emissions	Too elaborate for smaller businesses	Anonymous	The requirements in COP 27 and COP 28 are structured such that the level of action is based on the significance of the impacts associated with the Member's operations. This is to allow for smaller Members. Guidance information about significance will support the implementation of this requirement.
57.	See question 2 on Water and emissions	if they meet the requirements	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.
58.	Natural capital RJC have included a provision on Natural capital (COP 28.2), to provide more specific requirements for members with mining and mineral processing activities specifically in regard to the use of natural capital. Do you have any thoughts on this addition?	I believe that requirements of provision on Natural Capital surpass current capacities of most of the members. Just think about small shops and boutiques!	Eduard Stefanescu, C. Hafner GmbH + Co. KG	The requirements in COP 27 and COP 28 are structured such that the level of action is based on the significance of the impacts associated with the Member's operations. This is to allow for smaller Members. Guidance information about significance will support the implementation of this requirement.
59.	See question on Natural capital	No specific thoughts	Joelle Ponnelle, Richemont	Thanks for your comment response.
60.	See question on Natural capital	No	Anonymous	Thanks for your comment response.
61.	See question on Natural capital	We agree	Jessica Dos Santos, Garaude	Thanks for your comment response.
62.	See question on Natural capital	i think is correct although we aren't dealing with mining and we do have a sort or radical position on that subject , close them all !	Anonymous	Thanks for your comment. Implementation of the COP aims to improve the responsible sourcing and production of RJC materials in the Jewellery and Watch making supply chain.

63.	See question on Natural capital	28.3 d. Specific mention should be made to grievance mechanisms here to ensure that stakeholders affected by natural capital use are heard. Furthermore, natural capital impacts assessed in 28.3 b should be accessibly communicated and agreed to by stakeholders that may be affected.	Charlie Espinosa, Amazon Aid	28.3d: under the new COP 2.6 members are required to have an accessible rights-compatible grievance mechanism in place for all stakeholders to raise grievances. COP 28.3b applies to all members. Members with mining and mineral processing operations which likely have significant impacts to land, are also subject to COP 35 Impact Assessment, which requires impacts to be disclosed.
64.	See question on Natural capital	Everything is clear and achievable	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.
65.	1. Applicability of provisions to mineral processors The RJC have expanded the scope of a number of provisions to be applicable to mineral processors. A definition of mineral processors can be found in the draft standard. Do you have any feedback on this expansion?	No particular comment.	Eduard Stefanescu, C. Hafner GmbH + Co. KG	Thanks for your comment response.
66.	See question 1 on Applicability of provisions to mineral processors	No specific thoughts	Joelle Ponnelle, Richemont	Thanks for your comment response.
67.	See question 1 on Applicability of provisions to mineral processors	No	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
68.	See question 1 on Applicability of provisions to mineral processors	No	Anonymous	Thanks for your comment response.
69.	See question 1 on Applicability of provisions to mineral processors	We agree	Jessica Dos Santos, Garaude	Thanks for your comment response.
70.	See question 1 on Applicability of provisions to mineral processors	Agreed but as a necessity dictated by the reality of the mining that should be restricted the most we can	Anonymous	Thanks for your comment response.
71.	See question 1 on Applicability of provisions to mineral processors	Everything is clear and achievable	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.

72.	2. Do you feel these provisions are sufficiently worded to cover this additional scope?	Yes, these provisions are sufficiently worded to cover this additional scope.	Eduard Stefanescu, C. Hafner GmbH + Co. KG	Thanks for your comment response.
73.	See question 2 on Applicability of provisions to mineral processors	YES	Lea Meheust, Hermes	Thanks for your comment response.
74.	See question 2 on Applicability of provisions to mineral processors	No specific thoughts	Joelle Ponnelle, Richemont	Thanks for your comment response.
75.	See question 2 on Applicability of provisions to mineral processors	Yes	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
76.	See question 2 on Applicability of provisions to mineral processors	No	Anonymous	Thanks for your comment response.
77.	See question 2 on Applicability of provisions to mineral processors	Yes	Jessica Dos Santos, Garaude	Thanks for your comment response.
78.	See question 2 on Applicability of provisions to mineral processors	The point is what we really want from this new enlargement of scope, I don't see much more than a description of activities which is the consequence	Anonymous	The expansion requires that Members with mineral processing operations are subject to the same COP requirements as mining operations.
79.	See question 2 on Applicability of provisions to mineral processors	If they covered the whole field	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.
80.	1. Diversity & inclusion The RJC have added a new provision to strengthen the COP requirements on diversity & inclusion. Do you have any thoughts on this addition?	Generally agree, but making outcomes of an assessment publicly available is always a sensitive topic.	Eduard Stefanescu, C. Hafner GmbH + Co. KG	Noted. This has been aligned with COP 2.7.
81.	see question 1 on Diversity & inclusion	OK	Lea Meheust, Hermes	Thanks for your comment response.
82.	see question 1 on Diversity & inclusion	COP 23.2: Training visitors does not seem appropriate. We suggest limiting the training to the workers.	Joelle Ponnelle, Richemont	Noted. Training of visitors has been revised to workers only
83.	see question 1 on Diversity & inclusion	Well covered	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
84.	see question 1 on Diversity & inclusion	No	Anonymous	Thanks for your comment response.

85.	see question 1 on Diversity & inclusion	Positive	Anonymous	Thanks for your comment response.
86.	see question 1 on Diversity & inclusion	Aligns with current regulations/laws	Anonymous	Thanks for your comment response.
87.	see question 1 on Diversity & inclusion	It's good to expand on diversity and inclusion topics	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.
88.	2. Do the requirements align sufficiently with existing frameworks and best practice?	Yes, they do.	Eduard Stefanescu, C. Hafner GmbH + Co. KG	Thanks for your comment response.
89.	see question 2 on Diversity & inclusion	YES	Lea Meheust, Hermes	Thanks for your comment response.
90.	see question 2 on Diversity & inclusion	YES	Joelle Ponnelle, Richemont	Thanks for your comment response.
91.	see question 2 on Diversity & inclusion	Yes	Thomas Hadleigh, BROCHARD PARIS - THOMAS HADLEIGH LONDON	Thanks for your comment response.
92.	see question 2 on Diversity & inclusion	No	Anonymous	Thanks for your comment response.
93.	see question 2 on Diversity & inclusion	Yes	Jessica Dos Santos, Garaude	Thanks for your comment response.
94.	see question 2 on Diversity & inclusion	Yes	Anonymous	Thanks for your comment response.
95.	see question 2 on Diversity & inclusion	Yes	Anonymous	Thanks for your comment response.
96.	see question 2 on Diversity & inclusion	If they line up	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your comment response.
97.	Resettlement date The RJC had added a new provision 37.3 on resettlement in relation to existing mining or mineral processing operations. We are seeking stakeholder feedback to best determine the date of reference for this provision. o [date TBD] 2025: The date of implementation of the new COP standard.	2025: The date of implementation of the new COP standard.	Eduard Stefanescu, C. Hafner GmbH + Co. KG	Thanks for your response. The final date to be agreed by the Standards Committee and the RJC.

	<ul style="list-style-type: none"> o 23 April 2019: the date of implementation of the previous RJC standard. o April 30 2006: Date used by other existing industry standards, and is the date of IFC adoption of the Sustainability Framework. 			
98.	See question on Resettlement date	date TBD 2025	Lea Meheust, Hermes	Thanks for your response. The final date to be agreed by the Standards Committee and the RJC.
99.	See question on Resettlement date	No specific thoughts	Joelle Ponnelle, Richemont	Thanks for your comment response.
100	See question on Resettlement date	23 April 2019: the date of implementation of the previous RJC standard.	Jessica Dos Santos, Garaude	Thanks for your response. The final date to be agreed by the Standards Committee and the RJC.
101	See question on Resettlement date	April 30 2006	Anonymous	Thanks for your response. The final date to be agreed by the Standards Committee and the RJC.
102	See question on Resettlement date	The date of implementation of the new COP standard	Anonymous	Thanks for your response. The final date to be agreed by the Standards Committee and the RJC.
103	See question on Resettlement date	June 5, 2025 - In reference to World Environment Day	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	Thanks for your response. The final date to be agreed by the Standards Committee and the RJC.
104	General comment	COP 27 and 28: Although they go in the right direction for the Planet, are the environmental provisions, i.e., COP 27 and 28, not at risk of having 2 levels of audit requirements considering large and small companies?	Joelle Ponnelle, Richemont	This is by design. The requirements in COP 27 and COP 28 are structured such that the level of action is based on the significance of the impacts associated with the Member's operations. This is to allow for smaller Members. Guidance information about significance will support the implementation of this requirement.

105	General comment	<p>COP1 // I strongly DISAGREE on the referred respect of the laws on working conditions as it is conceived , IT IS TOO LOOSE !! You allow unlimited exploitation of workers preview in those national legislations which are soliciting working weeks of 60 hrs plus overtime in some cases. This is exactly the contrary of the purpose of amelioration of life condition . ILO provisions on working hours is back to 1950 we need to move forward and we need to decide whether this association is willing or not to go trough on the crucial point of a blatant exploitation of workers . COP 1 It is too weak and unqualifiable on the modern industry . It is a Thatcherian's nightmare . In general the positive aspects are submerged by the weakness of working hours and conditions . What do you care to have eliminated any gender gap if you work as it happens in our industry 65 hours a week ?? What do you do with all that equality ?? NOTHING at all. You seem unwilling to establish an updated limit to the working hours , 40 hours , that should be the target and soon to come the limit , 45 hours at max with overtime. The law of your country allows more , it will be company's choice to have or to have not embraced the pace of the sustainability in life or keep chatting about on accessories and small details !! In general i am deeply disappointed by the lack of positioning in a real definition of sustainable life which means TIME , time for family , time for experiences , time for culture , time for studies and continuous improvement . Without this all the rest is smoke with no roast .</p>	Anonymous	<p>Thanks for your comment. Implementation of the COP aims to improve the responsible sourcing and production of RJC materials in the Jewellery and Watch making supply chain. COP 1 is designed to ensure members adhere to applicable law, however where the standard goes above and beyond the applicable law members must adhere to the standard (as long as it is not in violation of applicable law). In regard to working hours, member must adhere to COP 16 working hours, designed in line with the ILO.</p>
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	General comment	<p>The phrase “with due regard to business confidentiality,” made throughout, should be clearly defined so as to avoid evasion of public reporting requirements. COP 7. Third-party audits should be made publicly accessible so members can be held publicly accountable. Due diligence requirements should include environmental and climate-related harms, in compliance with standards set out in the OECD’s Environmental Due Diligence Handbook. COP 8.C.3 Should make specific mention of supporting initiatives that promote the transition of ASM miners to mercury-free and other environmentally-friendly methods. COP 34 Given the high incidence of harms to Indigenous peoples in mineral supply chains, all members should be required to ensure their supply chains are free of violations to Indigenous rights, including their right to free and prior informed consent (FPIC) as required by the ILO Convention 169, the UN Declaration on the Rights of Indigenous Peoples, and by the UN Human Rights Council Res. 39/12</p>	Charlie Espinosa, Amazon Aid	<p>Thanks for your comments. Reference to business confidentiality is intended to protect commercial interests only. This is specified in the Guidance. COP 7: Third party audits can be made publicly available at the discretion of the Member. However as per COP 7.3, refiners are required to publicly report information about the sourced materials including gold. Reference to the OECD’s Environmental Due Diligence Handbook, to be included in the Guidance for COP7. COP 8.1c(iii). These examples can be included in the Guidance to support COP 8 including a cross reference to COP 42 which deals with Mercury use. COP 34: Guidance to support implementation of COP 34 and 35 will be expanded to ensure the assessments identify any human rights abuses.</p>
	General comment	<p>COP 1 - Corporate Responsibility Management: This principle emphasizes the importance of responsible and ethical management within companies. Add Comment: It might be helpful to include specific examples of how companies have implemented or could improve their management practices to reflect these values. COP 2 - Human Rights: Focuses on respecting and promoting human rights in all mining operations. Add comment: It would be beneficial to analyze the effectiveness of current measures and propose additional methods to ensure that human rights are a priority. General - Environmental Impact: General provisions typically cover minimizing the environmental impact of mining operations. Add Comment: How current regulations address environmental issues could be discussed and what</p>	Juan Pastrana Escobar, MINERA SOTRAMI S.A.	<p>Thanks, these are good suggestions for the guidance.</p>

		new policies could be implemented to further reduce ecological damage.		
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