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# RJC CHAIN OF CUSTODY STANDARD – Supplementary Guidance

## COC Recycled Precious Metals and Excluded Components

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### **1. Purpose**

The 2024 version of the Chain of Custody Standard includes an updated definition of recycled materials with a requirement for members to provide a declaration on the type of recycled materials in the new Provision 10.4 on Product Claims. In addition, Provision 10.5 contains an updated list of non-COC components of watches and jewellery products that can be excluded from COC claims.

The Guidance to the 2024 COC Standard and associated FAQs outline a transition period of 12 months from the issue date of the Standard after which the new requirements must be implemented, including the re-labelling of any existing eligible COC recycled stocks. This supplementary guidance explains how these requirements and the associated deadline also apply to those members certified to the 2017 version of the COC Standard to ensure that Transfer Documents and other representations made include the information members certified to the 2024 COC Standard will need to be able to comply with this requirement.

### **2. Definitions**

**Recyclable materials:** Materials that have been previously processed or used (including end-user, post-consumer, and scrap and waste products or materials arising during process operations or manufacturing) and then returned to the supply chain to begin a new life cycle as 'recycled material'.

**Source of Recyclable materials:** Sources of eligible recyclable materials are defined as:

- a. Pre-consumer gold, silver or PGM: gold, silver or PGMs derived from the 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.
- b. Post-consumer gold, silver or PGMs: gold, silver or PGMs derived from post-consumer precious metal products, such as jewellery and ornaments sourced from individuals, organisations or industrial facilities in their role as end-users of a fully assembled product. This includes products that have been used or were intended to be used for their original purpose that are no longer required/desired or can no longer be used for their original purpose.
- c. Material derived from waste: gold, silver or PGMs derived from pre- or post-consumer precious metals or a mix of both, industrial products including waste electrical and electronic equipment, or industrial components such as spent catalysts and fuel cells.
- d. A mix of the above clearly traceable to eligible sources.

**Recycled material claim:** Any claim in relation to material being recycled which must include a transparent and unambiguous declaration of the sources of material included and whether these are pre-consumer recycled, post-consumer recycled, recycled material derived from waste or a mix of these types. Where this is a mixed recycled material, the type(s) of source shall be stated.

**Non-COC excluded components:** COC claims can be made in relation to watch and jewellery products made of COC material, which include some minor non-COC jewellery components. A list of these non-COC excluded components can be found in the RJC COC guidance document.

### **3. Applicability**

The RJC recognises that members rely on representations from their suppliers to be able to make accurate claims. It is, therefore, essential that all entities in the chain of custody apply the same definitions and make claims that will support the onward accurate description of COC materials and products.

As a result, the requirements relating to the definition of eligible recyclable materials in provision 6.1 and claims in provisions 10.4 and 10.5 of the 2024 COC will also apply to the 2017 version of the Standard.

### **4. Procedure**

#### **4.1 Recycled materials**

The definition of acceptable eligible COC recycled materials has been updated to recognise that materials could come from pre-consumer, post-consumer and waste sources, and to require a clear declaration of the type of recycled material. In order to accommodate this requirement and ensure that customers have the information to enable them to pass on accurate declarations, a transition period of 1 year from publication of the 2024 COC Standard has been established for any existing stocks of COC recycled material to be sold or re-labelled.

For COC certified Members	For RJC audit firms
<p>Existing stocks of recycled materials can continue to be sold during the transition period. For material sold from 1 January 2026, you should ensure that you have obtained information on the type of recycled materials included and have undertaken appropriate due diligence and verification to satisfy yourself that the material has been correctly described in line with the new definition. Any Transfer Documents issued after this date must contain the relevant descriptions and declarations as included in the latest Transfer Document template. You may continue to use your own template as long as you update it to include the relevant information.</p> <p>If you are unable to establish the specific types of recycled material included, you must label this as “recycled from pre- and postconsumer materials” from this date.</p>	<p>If you are undertaking an audit prior to 1 January 2026, check that the entity is aware of the new requirement as set out in provision 6.1 of the 2024 COC Standard and has a plan to obtain the necessary information and undertake due diligence to verify any claims that are being passed on and implement the required declaration from 1 January 2026 onwards.</p> <p>For audits after 1 January 2026, you must verify that the entity is applying the definition of eligible recyclable materials as set out in provision 6.1 of the 2024 COC Standard and is making the required declarations as defined in provision 10.4 and its associated guidance.</p>

## 4.2 Non-COC components for exclusion in COC products

Some non-COC items that were previously permitted under the 2017 COC standard for watches and finished jewellery products to be claimed as being made of COC material have been removed. A transition period of 1 year from publication of this standard has been established for any existing stocks to be sold. After this time any products containing these components will need to be re-labelled as non-COC.

For COC certified Members	For RJC audit firms
<p>Existing stocks of products including the newly excluded components can continue to be sold as being made of COC material until 1 January 2026.</p> <p>After this date you will need to re-label these as non-COC and ensure that you update any Transfer Documents being issued or other materials that include claims to clearly identify the COC and non-COC components in products you are supplying in line with the new definitions on provision 10.5 of the 2024 COC Standard.</p>	<p>If you are undertaking an audit prior to 1 January 2026, check that the entity is aware of the new requirement as set out in provision 10.5 of the 2024 COC Standard and has a plan to segregate existing stocks for resale and re-label any remaining items after the transition period has ended.</p> <p>For audits after 1 January 2026, you must check that the entity is applying sufficient controls to verify which components previously eligible as exempt for products to be described as COC have now been excluded and that items being sold are being correctly classified with lists of non-COC components identified in accordance with provision 10.5 of the 2024 COC Standard.</p>

**Disclaimer**

No guarantee, warranty or representation is made as to the accuracy or completeness of the guidance and other documents or information sources referenced in the guidance. Compliance with the standard is not intended to, nor does it replace, contravene, or otherwise to alter the requirements of any applicable national, state or local governmental statutes, laws, regulations, ordinances or other requirements.

Please note this guidance gives information on the implementation of the RJC COC Standard and may not always be a complete and authoritative statement on each of the subjects covered. Following the guidance is entirely voluntary and is neither intended to, nor does it, create, establish or recognise any legally enforceable obligations or rights against the RJC and/or its members or signatories.