

April 25, 2024

Comments from Alliance for Responsible Mining to the [RJC CoC public consultation](#) 'Round 3' on recycled precious materials.

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.

The International Organization for Standardization (ISO) 14021 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'.

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.

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.

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.

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).

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.

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.

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”. The sources of the arguments can be found in the open letter.

The Alliance for Responsible Mining