

Subject: Strengthening Transparency within Responsible Jewellery Council Certification Schemes

April 15th, 2026

To: Ms. Purvi Shah
Executive Director
Responsible Jewellery Council

Dear Ms. Shah,

As a group of civil society organizations with objectives of improving governance and sustainability within mineral supply chains, we are writing to encourage the Responsible Jewellery Council (RJC) to further strengthen transparency within its certification and assurance schemes, in line with evolving international expectations on responsible mineral supply chains. Expectations for supply chain transparency have continued to grow since the adoption of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance), including its application to mineral supply chains beyond 3TG. This includes the disclosure of suppliers in red flag locations.

Greater public disclosure is increasingly recognized as essential to the credibility and effectiveness of responsible sourcing initiatives, particularly in high-risk and conflict-affected areas. Transparency enables meaningful scrutiny, supports continuous improvement, and helps ensure that due diligence frameworks deliver tangible outcomes for affected communities.

At the same time, company failure to engage meaningfully along supply chains and report fully and transparently on engagement on human rights, environment, and anti-money laundering risks exposes them reputationally in the eyes of investors and shareholders and can lead to increased risk of litigation.

Therefore, the recent adoption of new disclosure requirements by the London Bullion Market Association (LBMA) for its Good Delivery refiners is a development of note. Specifically, the LBMA is requiring refiners to disclose the names of gold suppliers operating in “red flag locations”, as prescribed by Footnote 59 of the OECD Guidance (Gold Supplement). The LBMA also now requires disclosure of all country locations from which LBMA refineries have sourced mined gold and all mines that belong to World Gold Council members. These represent relevant developments in aligning industry practice with the OECD’s expectations around risk transparency and accountability. At the same time, the NGO community maintains its long-standing position that red flag locations are not limited to mine sites alone, extending to all high-risk areas using the OECD definition, and that serious human, environmental and criminal risks can be found at any point along a gold (or other mineral) supply chain. We note that gold amalgamators, processors, traders and bullion banks should also be considered as high risk and assessed and disclosed accordingly. We continue to urge the LBMA to further improve their disclosure regime in this regard.

Given RJC’s central role in setting standards for responsible business conduct across the jewellery and watch sector, we encourage the RJC consider comparable enhancements to transparency across its own standards and assurance processes by requiring their members to disclose suppliers from red flag locations. Increased disclosure—particularly with respect to sourcing from red flag locations—would reinforce alignment with the OECD Guidance, strengthen confidence in RJC certification, and ensure

consistency with emerging best practices among leading industry initiatives.

In addition, in the past year, an unprecedented number of state agreements, partnerships, frameworks, or trade deals explicitly involving critical minerals that include gold, or their supply chains have been signed across the world. The RJC must use its platform and tools to ensure that increased investment and trade in the gold sector is channelled towards transparent and responsible trade, rather than a race to the lowest and most harmful practices

We recognize the complexity of balancing commercial sensitivities with transparency objectives. However, the direction of travel across the responsible minerals landscape is clear: meaningful disclosure is no longer optional, but a necessary component of credible due diligence systems. Moreover, the rapid growth of trade databases and the increasing availability and sharing of commercial data through these platforms indicate that transparency of this nature is unlikely to have a negative impact on commercial competitiveness. On the contrary, enhanced disclosure can help level the playing field, reduce information asymmetries, and strengthen trust across supply chains.

We would welcome the opportunity to engage further with RJC on how enhanced transparency could be incorporated into existing schemes in a way that is practical, proportionate, and impactful. More specifically, we would welcome an opportunity for discussion on this topic at your earliest convenience.

Yours sincerely,

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