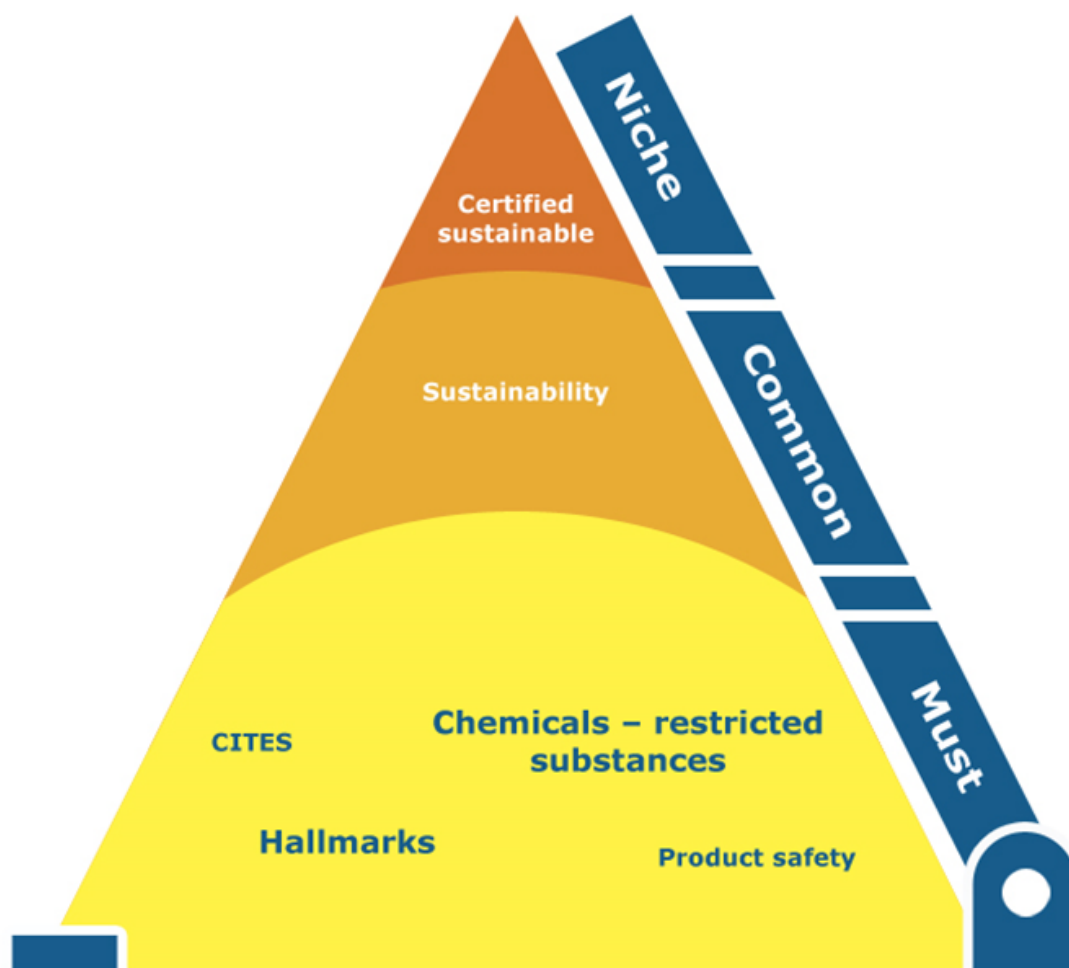


What requirements should jewellery comply with to be allowed on the European market?

Buyer requirements can be divided into (1) *musts*, requirements you must meet in order to enter the market, such as legal requirements, (2) *common* requirements, which are those most of your competitors have already implemented, in other words, the ones you need to comply with in order to keep up with the market, and (3) *niche* market requirements for specific segments.



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1. Which legal requirements must my products comply with?

Here you can find requirements you must meet when marketing your products in the EU. Pay attention to the indications of which materials are concerned per requirement described.

The following 'musts' apply to the products and used materials used listed here:

- General product safety – applicable to all products
- Chemicals – As jewellery is usually worn on the skin, the use of hazardous chemicals is restricted
- CITES – applicable to products made from wild plants and animals
- Hallmarks – applicable to golden and silver jewellery in some countries

General product safety: The General Product Safety Directive basically states that all products marketed in the EU must be safe to use and forms a framework for all specific legislation established for specific products and issues. If no specific legal requirements have been set for your product and its uses, the General Product Safety Directive still applies. If there are specific requirements applicable to you, the General Product Safety Directive applies in addition, covering all other safety aspects which may not have been described specifically.

For a full overview of all legal requirements set for your product, see the [EU Export Helpdesk](#) where you can identify your product code to get a list of requirements applicable.

Considerations for action:

Check the information on specific requirements provided by your buyer. Some will just ask for compliance with EU legislation (and let you find out for yourself what these requirements exactly are) while others provide information which specific substances are not allowed.

Chemicals – restricted substances: The EU has restricted a great number of chemicals in products that are marketed in the EU. These are listed in the so-called [REACH](#) Regulation ((EC) 1907/2006). Which chemicals are of relevance for you will depend on your specific product and materials.

Considerations for action:

Check CBIs introduction to REACH to determine in which ways you are affected by REACH.

If you are sourcing parts of your products from other producers, make sure that your suppliers are aware of the requirements on chemicals as well.

Here is an overview of the most common materials used in jewellery:

Metals (lead, cadmium, and nickel): To avoid allergic reactions, the EU has restricted the use of certain heavy metals:

- [Cadmium and its compounds](#) in bracelets, necklaces, rings, piercing jewellery, wrist watches, wrist-wear, brooches and cufflinks.
- [Nickel](#) in earrings, necklaces, bracelets, chains, anklets, finger rings, wrist-watch cases, watch straps and tighteners.
- [Lead and its compounds](#) in bracelets, necklaces, rings, piercing jewellery, wrist watches, wrist-wear, brooches, cufflinks and any individual part or component.

Considerations for action:

Read more on restricted substances in jewellery in the [EU Export Helpdesk](#).

Note that if you have to change your material composition to avoid using lead, nickel or cadmium, this

may influence the characteristics (e.g. strength, colour) of your product.

Azo dyes: If you use textiles or leather in your products, make sure that these do not contain azo dyes that release any of the [22 aromatic amines](#) which are prohibited. The EU legislation lists the aromatic amines, not the azo dyes which release them. The vast majority of azo dyes are therefore legally acceptable. Moreover, most reputable dye manufacturers only produce legally accepted dyes. However, border rejections and market withdrawals do show that azo dyes still is an issue that causes problems on the EU market, as a number of tested products still show the prohibited aromatic amines and are consequently withdrawn from the market.

Considerations for action:

Making sure that your products do not contain any of the azo dyes which release the forbidden aromatic amines, also includes checking your suppliers. To test your products, use the official tests. You can find the tests on the [CEN website](#):

CEN Leather – Chemical tests – determination of certain azocolourants in dyed leathers. Reference: EN ISO 17234-1 :2010 and 17234-2:2011.

CEN Textiles – Methods for the determination of certain aromatic amines derived from azocolourants – Part 1: Detection of the use of certain azocolourants accessible without extraction. Reference: EN 14362-1/3:2012.

Familiarize yourself with the full list of restricted substances in textile products marketed in the EU by checking out [restricted chemicals in textile products in the EU Export Helpdesk](#).

Chromium VI in Leather

In March 2014 new legislation was adopted that restricts the chromium VI content in leather products. Chromium VI compounds can be formed in leather through the oxidation of chromium III compounds, which are added in some tanning processes.

The restriction is that the chromium VI content should not exceed 3.0 mg/kg.

Considerations for action:

Although the new legislation officially applies from 1 May 2015, buyers already often require their suppliers to comply with the restrictions on Chromium VI.

The test method used to verify compliance with the restriction is [EN ISO 17075](#).

Consider alternative leather solutions, such as [Vegan leather](#), [Wet white tanning](#) or [eco leather](#).

CITES - products from wild plants and animals: If you use parts of wild plants or animals in your product (e.g. shells, coral, leather and wood), you need to make sure that these are not from endangered species and thus not fall under the restrictions of the Convention on International Trade in Endangered Species (CITES). The EU

has implemented the requirements in Regulation 338/97 and lists restricted species (including products thereof) and special procedures where applicable.

Considerations for action:

If you are not certain whether your products fall within CITES or not, you need to find out. You can read more about the legislation in [CITES in the EU Export Helpdesk](#) and check out the links to find out whether or not CITES is relevant to you. The EU Export Helpdesk also provides information on the different procedures applicable to the different categories within CITES.

Note that even if you use materials from farmed animals or plants, buyers can still be hesitant to buy it. For example, because crocodile leather from farmed crocodiles may be associated with endangered wild crocodiles by consumers.

Hallmarks (for gold and silver jewellery): In many EU countries, a system of hallmarking and control is used to verify the precious metal content in gold and silver jewellery.

The rules on precious metals control are not harmonised in the EU. In some Member States control and hallmarking of every article by an independent body is compulsory, while others have a voluntary hallmarking system or only require prescribed marking by the manufacturer.

Considerations for action:

Research if testing and hallmarking is necessary for your product and the country you are exporting to.

Check this [overview of rules on hallmarking](#) per country

General requirements on packaging and liability

Note that there is also non-product-specific legislation on [packaging](#) and [liability](#) that apply to all goods marketed in the EU

Building Safety

In the garments industry, building safety is an issue. This is because lives have been lost in factory fires and collapses that could have been avoided if the right precautions had been taken. The [Accord on Fire and Building Safety in Bangladesh](#), signed in 2013, is a good example of how safety awareness has come to include fire and building safety.

It is likely that this awareness will spread to other sectors, including jewellery, in the years to come.

Considerations for action:

Some jewellery suppliers operate within garment factories. If you do, make sure the building your staff work in is (fire) safe and complies with the relevant standards in this area.

If you can, take measures to ensure the (fire) safety of your building or factory. Also, try and get certification for this aspect. It will give you an edge on competitors.

If you have taken proper fire and safety measures, be sure to communicate this proactively with buyers. It may bring in more business and higher margins for you. Also, actively look for buyers to whom this is an important condition. Otherwise you may end up doing business with companies used to lower safety standards – and lower margins.

2. Which non-legal requirements apply to my products?

Sustainable performance: Sustainability is one of the ways for companies to differentiate themselves, and the means of offering sustainable products are numerous, ranging from recycling to choice of sustainable materials, sustainable design, improved social (working) conditions to certification and use of labels (see 'Niche').

Two retail initiatives have gained quite some ground in (particularly) western European countries: [Business Social Compliance Initiative \(BSCI\)](#) and [Ethical Trading Initiative, ETI](#). ETI originates in the UK (and therefore has a relatively strong presence in the UK) and BSCI was originally developed in Germany and is more present in western and northern Europe.

Other commonly used standards are those of

[ICMM](#) (sustainable mining), [RJC](#) (Responsible Jewellery Council) and [IRMA](#) (Initiative Responsible Mining Assurance).

Considerations for action:

Look into the possibilities of improving your sustainability performance. This may not always include immediate certification or application of a label (read the information in 'Niche'), but familiarizing yourself with issues included in the initiatives will give you an idea of what to focus on.

Buyers appreciate a good story. If you can show that you have evaluated your own company's performance, (e.g. by a self-assessment or a code of conduct), this may be a competitive advantage.

In case you are targeting the UK market familiarise yourself with the [ETI base code](#) to check what [ETI members](#) require from their suppliers.

When targeting other EU markets it might be interesting to assess your company's current performance by doing [the online BSCI self-assessment for producers](#). This extensive and very helpful self-assessment tool covers all the main sustainability topics, from your working environment and conditions to remuneration practices, supply chain mapping, grievance mechanisms and more.

3. ITC's Standards Map

Check the International Trade Centre's Standards Map <<http://www.standardsmap.org/identify>>, an online tool which provides comprehensive information on over 130 voluntary sustainability standards and other similar initiatives covering issues such as food quality and safety. In Standards Map you can identify standards or codes of conduct relevant to your product, review the main features of the selected standards and codes and compare standards' requirements side-by-side. Furthermore you can assess your company's performance against standards requirements in a self-assessment module, and generate your own company's "sustainability

diagnostic report" which you can then share with the business community. Check the Standards Map videos <<https://www.youtube.com/watch?v=hRghHKufMW8&list=PLVgDaw1NnOSAjk06sG6kWcpujCutXRjZg>> to see how Standards Map can help you to determine which initiatives may be useful for your company.

4. Which non-legal, niche requirements apply to my products?

While sustainability is gaining ground, the actual use of certification is still a niche in this sector.

Fairtrade products: Among the niche initiatives, the 'fair trade' concept, which supports fair pricing and improved social conditions for producers and their communities, is the best known, with a relatively large market presence (including several sectors). Often producers are assessed by shops (e.g. so called 'world shops') or brands (e.g. [FairForward](#)) rather than certified by the [Fairtrade](#) Labelling Organisation.

Considerations for action:

If you are looking to focus on the ethical niche market, you need to find business partners in this niche. Familiarizing yourself with the initiatives and how they work is an initial step in finding out whether or not your company would be a good match.

Use the story of your exceptional social and environmental performances as a marketing tool. Consumers show more and more interest in the origin of the products they are buying and the story behind products.

Precious metals and stones

The last years, there have been more public awareness of bad working conditions and basic human rights abuse during the mining of gold and diamonds and other precious metals and stones. Some initiatives aim to guarantee fair and responsible practices in the whole jewellery supply chain, such as [Fairgold](#), [Fairmined](#) and [Oro Verde](#) (Green Gold).

Considerations for action:

Having your products certified may be an intensive and often expensive process, so make sure that you research well if it is feasible from a commercial point of view.

Check the [code of practice of the Responsible Jewellery Council](#).

Read more on the [Fairgold](#) standard here.

Consult the [Standards Map database](#) for the different labels and standards relevant for jewellery.

Environmental performance

Environmental awareness is spreading among consumers and also among buyers. While it is not as advanced in the jewellery sector as it is in the apparel sector, it is clearly gaining importance. It is important to realise that the term environmental performance is not just about avoiding hazardous materials. In the years to come it will affect more and more aspects of your business. For example, energy consumption, waste management, recycling, packaging and supply chain logistics. Each of these areas can affect your environmental performance.

Considerations for action:

You can often improve your performance by taking simple measures to improve energy consumption, waste management, recycling, packaging and supply chain logistics, for example. Find out where you can improve without having to make major investments.

Communicate any improvements in your environmental performance, even small ones, with buyers in order to position yourself as a (more) responsible supplier.

Ask your buyers which environmental performance aspects they would like to see you implement.

Fair wages

Fair wages are also becoming more and more important to consumers and buyers in Europe. Some buyers are issuing declarations that the labourers in all of the factories they work with are all paid fair wages. This means they will no longer accept suppliers whose workers receive unfair or intransparent wages. Finding suppliers who can meet this requirement can be a challenge to buyers. Usually, a 'fair wage' means workers receive at least the minimum wage allowed in their country, but often the level considered acceptable by buyers is higher than that.

Considerations for action:

Check this [list of minimum wages per country](#) to find out how your workers' wages compare.

Ask buyers whether they have a fair wage standard.

If you can comply with the fair wage standard, be sure to communicate this proactively with buyers. It may bring in more business and higher margins for you.

If you pay your workers fair wages, actively look for buyers to whom this is an important condition. Otherwise you may end up doing business with companies used to lower standards – and lower margins.

Traceability

Like environmental awareness, traceability is also becoming more important in the jewellery sector, especially in the sustainable jewellery niche. More and more jewellery businesses want to be able to trace their jewellery directly to its source. A few examples are [Valerio Jewellery](#), [Ute Decker](#) and [Gemporia](#) in the UK and [The Jeweltree](#) Foundation in the Netherlands.

Traceability applies to natural materials, such as metals, but also cotton and leather. Increasingly, buyers want to know where these materials come from. As traceability expectations rise, they will want to know exactly by whom, where and when the metal was mined or the cotton was cultivated. Also, traceability means knowing who spun or dyed the cotton, tanned the leather and made the final product.

It is likely that traceability standards will grow in the jewellery sector.

Considerations for action:

Expect demand for traceability information to grow in the coming years. Prepare for it by beginning to

document what you produce, where and how. Also chart your supply chain: where do you get your source materials and so on.

For an example of an organisation that helps businesses improve their traceability, check [The Dragonfly Initiative](#).

To find out more about cotton traceability, check the [BCI \(Better Cotton Initiative\) website](#).

To find out more about leather traceability, check the website of the [Leather Working Group](#).

New: the Greenpeace standard

The REACH standard discussed above is a legal requirement in Europe regarding the use of chemicals in your products. However, there is another standard that is also important to know about. It was launched during a recent

campaign by Greenpeace: [the Detox campaign toxic-free future](#). The standards Greenpeace

proposes in this initiative are stricter than those of REACH. The purpose of the initiative is to eventually ban the use of all harmful chemicals.

Considerations for action:

Read up on the new Greenpeace standard and make sure to check what your buyers expect of you in this area.

Especially if you want to operate in the sustainable jewellery niche, adopting this standard will give you a strong competitive edge.

Please review our [market information disclaimer](#).