



# TARNISHED GOLD?

Assessing the jewelry industry's  
progress on ethical sourcing of metals

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EARTHWORKS™



# Contents

<b>Executive Summary</b>	5
<b>Retailer Rankings</b>	9
Who Signed on, and who Responded?	9
Who Conducted a Supply Audit, and what Did They Find?	9
<i>Box 1—Third-Party Certification</i>	9
Who Incorporated the Golden Rules into their Contracts and Policies?	10
Who Notified their Suppliers about the Golden Rules?	10
Who is Using or Pursuing Recycled Gold?	10
Who is Actively Supporting Efforts on Third-Party Certification?	10
Who Signed the Bristol Bay Protection Pledge?	10
<i>Box 2—The Bristol Bay Protection Pledge</i>	11
<i>Box 3—Recycling as Responsibility</i>	12
<i>Box 4—Sourcing from Small-scale Mines</i>	14
<b>The Report Card</b>	12
<b>Appendices</b>	17
Appendix 1. Template of survey sent to jewelry retailers	17
Appendix 2. List of surveyed jewelers	18
<b>Endnotes</b>	19

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Barrick's Porgera Gold Mine in Papua New Guinea. PHOTO: Marta Miranda

**Globally, gold demand for jewelry is equivalent to 90 percent of mine production.**

Producing a single gold ring generates, on average, 20 tons of mine waste. Mining is the number one toxic polluter in the U.S. The average large gold mine uses 1,900 tons of cyanide per year.

Waste water running through a tailings pile,  
Papua New Guinea. PHOTO: EARTHWORKS



# Executive Summary

Gold mining remains one of the dirtiest industries in the world; it is responsible for polluted waterways, decimated forests and displaced communities in many parts of the world. Producing a single gold ring generates, on average, 20 tons of mine waste. Mining is the number one toxic polluter in the U.S. The average large gold mine uses 1,900 tons of cyanide per year.<sup>1</sup>

The No Dirty Gold campaign was publicly launched in 2004 as an effort to educate and motivate consumers and jewelry retailers to push the mining industry towards more responsible practices. There has been an immense surge in consumer support for cleaner mining and more responsible metals sourcing. But consumers still have little reliable assurance about the origins of their jewelry purchases. Do they contain gold from mines that destroyed rainforests or polluted fisheries with toxic chemicals? Did they finance violent conflict or put workers' health at risk? Or were they produced in ways that minimized environmental harm and protected human health?

There have been several steps in the right direction in the six years since the No Dirty Gold campaign was launched. Some jewelry retailers have taken some important steps towards sourcing precious metals responsibly and pushing the mining industry to mine responsibly. By signing the No Dirty Gold campaign's "Golden Rules" principles for responsible sourcing of precious metals, more than 60 jewelry companies have committed to switching to cleaner gold sources when available. (For a full list, please see: [www.nodirtygold.org/supporting\\_retailers.cfm](http://www.nodirtygold.org/supporting_retailers.cfm))

Several companies have begun to make the transition, or nearly completed this transition, by sourcing recycled gold and precious metals. Others have improved their ability to trace metals through the supply chain; to know where their gold comes from. Some have taken strong public positions on mining practices or projects they consider unacceptable. And importantly, many, if not all of these retailers have assumed responsibility for the origins of the products they sell to their customers. Since gold demand for jewelry accounts for the equivalent of about 90 percent of global mine production of gold, jewelers play a particularly important role in helping shift mining onto a more responsible track.<sup>2</sup>

## About the report

This report is an evaluation of the efforts made by jewelers towards responsible sourcing of precious metals. It is based on responses to a survey sent to the jewelers that had signed on to the Golden Rules by mid-February 2009 and to other large jewelry retailers who sold jewelry worth more than \$100 million.<sup>3</sup> A number of retailers have signed on to the Golden Rules since our survey and we will include these in future updates.

This report includes the results of a survey completed by 39 jewelers between February and October 2009. Based on their self-reporting to the No Dirty Gold campaign, these jewelers were graded in terms of progress made towards sourcing precious metals more

responsibly. In general, smaller jewelers scored higher on a number of indicators; four of these companies earned a grade A for their sourcing policies and practices. Many of these jewelers source relatively small quantities of gold, and have thus been well-positioned to make the transition to cleaner sourcing. Of the larger jewelers, the highest grade earned was a B, earned by three firms: Canadian Birks & Mayors, US luxury retailer Tiffany & Co., and a class rings company, Herff Jones. Some jewelers that responded to the survey signed on to the Golden Rules more recently than others, and thus have had less time to implement their commitments.

We also sent the survey to 29 large retailers who had not yet signed the Golden Rules. Three of these did subsequently sign (Sears, Blue Nile and Ultra Stores), but most did not. Some, like Target Corp., which has long resisted signing the Golden Rules, recognized having received the survey but refused to return it.

## Certifying more responsible mining

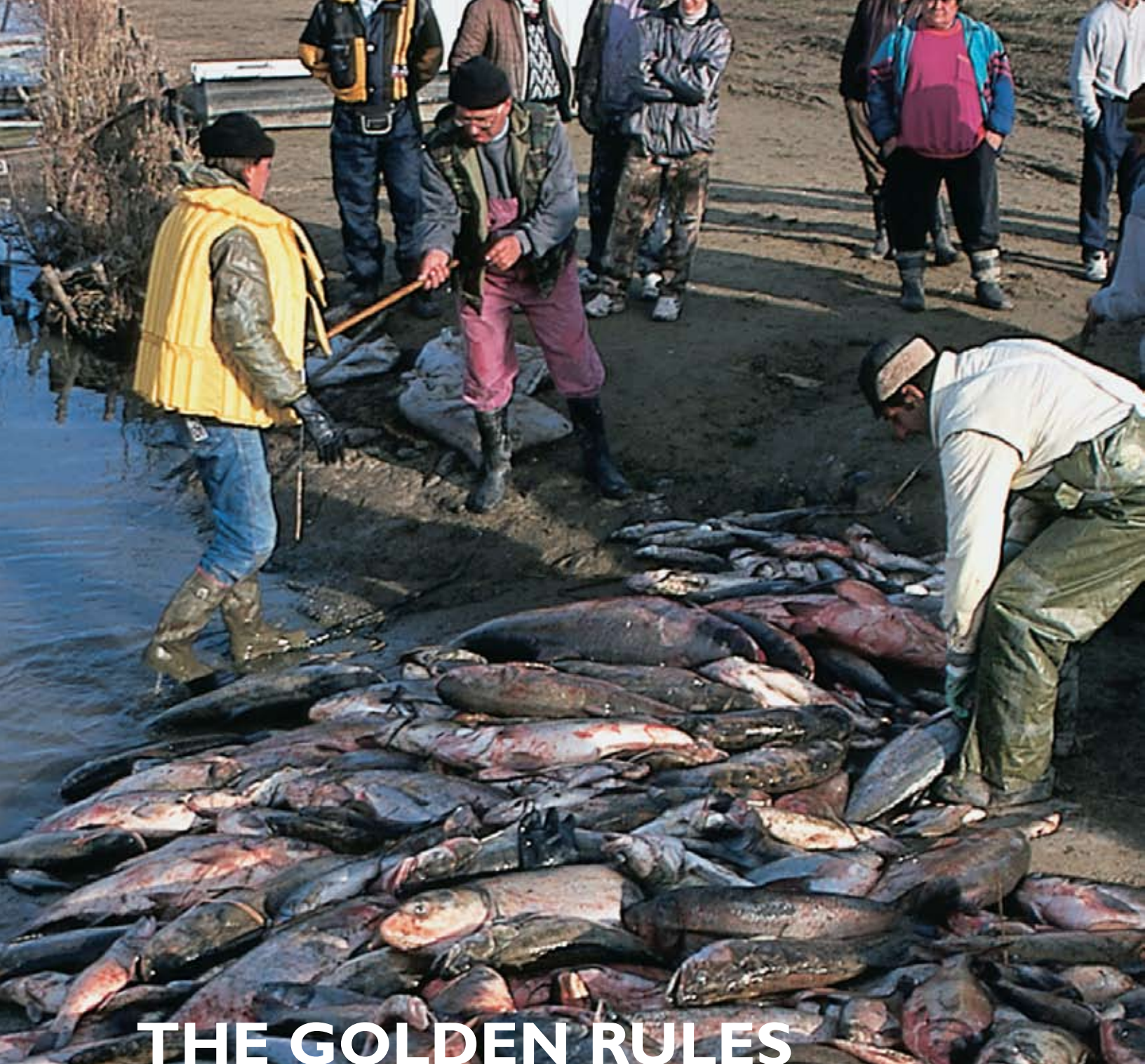
In a number of sectors ranging from wood products to organic foods, consumer efforts have resulted in the development of independent, third-party certification systems that verify the ethical production and sourcing of goods. The term “third-party” is used to denote a system in which the social and environmental standards were developed by a broad range of sectors including civil society and industry, and where compliance with those standards is verified by an independent entity.<sup>4</sup> Typically, these standards evaluate actual practices and performance at manufacturing or extraction operations, and not just company-wide policy.

At present, there is no widely accepted, independent, third-party certification system similar to those in forestry or other sectors that can assure a customer or retailer of the exact provenance of gold in jewelry or electronic circuits. (See Box 1.) But there are encouraging signs in this direction; in recent years, there has been significant progress made towards establishing such a system.

Determining exactly what a more responsible mine looks like is a challenge that some jewelers have taken on together with civil society groups and the mining industry. Some jewelers, such as Tiffany & Co., are demonstrating their commitment to third-party certification of more responsible mining by participating in the Initiative for Responsible Mining Assurance (IRMA) for large-scale mining. IRMA’s goal is to establish independent, third-party certification for the minerals and metals sector, and the initiative includes participants from labor unions, NGOs, and affected communities in addition to the mining and jewelry industries.<sup>5</sup> There are also efforts underway to develop second-party or industry-only assurance mechanisms, such as the Responsible Jewelry Council (RJC).<sup>6</sup> This is a business-to-business certification initiative (rather than a “performance-based” initiative). As they currently stand, the standards developed by this initiative do not satisfy the Golden Rules principles.<sup>7</sup>



The No Dirty Gold campaign’s puppet Goldzilla talks to jewelry shoppers on 5th Ave, New York.  
PHOTO: EARTHWORKS



# THE GOLDEN RULES

The signatories to the Golden Rules pledged to work towards sourcing precious metals that would not make them complicit in the destructive impacts of mining. This commitment means working to ensure that their suppliers of precious metals use responsible practices.

Fish killed by Baia Mare cyanide spill in the Tisza River, Romania.  
PHOTO: Tibor Kocsis



## The Golden Rules

The signatories to the Golden Rules pledged to work towards sourcing precious metals that would not make them complicit in the destructive impacts of mining. This commitment means working to ensure that their suppliers of precious metals use responsible practices including:

- respecting basic human rights as outlined in international conventions and laws;
- obtaining the free, prior, and informed consent (FPIC) of affected communities;
- respecting workers' rights and labor standards, including safe working conditions;
- not operating in areas of armed or militarized conflict;
- not forcing communities off their lands;
- not dumping mine waste into oceans, rivers, lakes, or streams;
- not operating in protected areas, fragile ecosystems, or other areas of high conservation or ecological value;
- not contaminating water, soil, or air with sulfuric acid drainage or other toxic chemicals;
- covering all costs of closing down and cleaning up mine sites;
- allowing independent verification of practices.



Community members near Yanacocha gold mine, Peru. PHOTO: EARTHWORKS

Jewelers also committed to auditing their current sources, to inform their suppliers of their Golden Rules sourcing commitment, and to increase recycled content in their products.



# Retailer Rankings

The sections below provide an explanation of how jewelry retailers were evaluated and scored by the No Dirty Gold campaign. A full list of survey questions can be found in Appendix 1.

## Who Signed on, and who Responded?

The jewelers that have signed the Golden Rules have taken a very important step towards responsible sourcing of precious metals by signaling their commitment to the mining industry and to their suppliers. In recognition of the commitments made, jewelers were awarded a point for taking the step of signing the Golden Rules.

A number of large jewelry retailers have yet to sign on to the Golden Rules.<sup>8</sup> For example, Target, which has long been identified by the campaign as a “laggard” in terms of responsible sourcing, received the survey but specifically declined to complete it.

## Who Conducted a Supply Audit, and what Did They Find?

We asked jewelers if they had conducted an audit of their supply chain, if that audit included the mine or recycled precious metal refinery, and if they had shared their supply information with the No Dirty Gold campaign. Jewelers who signed on to the Golden Rules had agreed to undertake such an audit to better understand their existing sources and supply chain. In general, the gold supply chain from mine to market is still extremely opaque. (This is true for several other metals, and for many other commodities as well.)

We awarded points for conducting an audit, for determining the mine or recycled precious metal refinery source, and for sharing that information with us. Most of the smaller jewelers and some of the larger jewelers did conduct an audit. Although few of the larger jewelers reported having included the mine or recycled source in their audit and few shared their supply information with No Dirty Gold, most of the smaller jewelers did so.

Based on the information that some jewelers did share about their supply, we were also able to award points to those jewelers that had some or all of their supply coming from sources that, based on their description, seek to comply with the Golden Rules. Most of the smaller jewelers reported supply sources that appear to be closer to compliance with the Golden Rules. These jewelers report sourcing either refineries that claim to be using recycled precious metals, or are sourcing from small-scale mining operations that, although they may not be fully responsible, at least state that they are not using cyanide or mercury.

## BOX I —Third-Party Certification

Third-party certification is a system in which “standards [are] created jointly by the full set of stakeholders. This generally means that the standards are negotiated by industry representatives and representatives of social, environmental, and community organizations, then audited annually by a totally independent outside organization.”<sup>9</sup> The various sectors and stakeholders jointly develop standards, and verification of compliance with those standards is independent of any of the stakeholders.

The Initiative for Responsible Mining Assurance (IRMA) is working to develop such a third-party system for large-scale mining. Decisions are made by a Steering Committee that consists of representatives from jewelry companies, mining companies, NGOs, labor unions, and affected communities. (For more information, please see: [www.responsiblemining.net](http://www.responsiblemining.net))

Third-party certification is also discussed in working groups of the Madison Dialogue ([www.madisondialogue.org](http://www.madisondialogue.org)), a forum for discussing small-scale mining and recycling of precious metals. Some working groups have used those discussions to begin the process of establishing third-party certification for aspects of those topics. As members of the Steering Committee of the Manufacturing Working Group of the Madison Dialogue, Reflective Images and Fifi Bijoux are contributing to those efforts.

## Who Incorporated the Golden Rules into their Contracts and Policies?

We asked jewelers if their sourcing policies and contracts reflected the Golden Rules. Doing so is a strong indication that jewelers are invested in ethical sourcing in the long-term. We awarded points if they reported that their policies did reflect the Golden Rules, if they shared their policies with us or if their policies were publicly available, and if they reported that the Golden Rules featured in their supplier contract language. Most of the smaller jewelers received points for the first two criteria, but only a few larger retailers did.

We also evaluated, when jewelers provided us with their policies or their policies were publicly available, whether or not those policies were indeed in accordance with the Golden Rules. Although few of the larger jewelers had sourcing policies that came close to fully reflecting the Golden Rules, many of the smaller jewelers did have such policies. Few jewelers reported that the Golden Rules are part of their contract language, although such contract arrangements are not as common for some of the smaller jewelers.

## Who Notified their Suppliers about the Golden Rules?

Increased awareness by suppliers of the need for responsible sourcing is an essential step in promoting more responsible mining. We asked jewelers if they had informed suppliers of their intent to abide by the Golden Rules and awarded points if they had done so. Almost all jewelers had taken this important step.

## Who is Using or Pursuing Recycled Gold?

The survey included questions about jewelers' use of recycled gold and other precious metals. Jewelers received points if they had set targets to increase their use of recycled precious metals, and if they had actually increased their use of recycled precious metals. We also awarded points on those questions if jewelers were already using nearly 100% recycled precious metals. Although not many of the larger retailers reported that

they are pursuing higher recycled content, many of the smaller jewelers who buy and sell far smaller quantities of gold, are actively doing so. (See Box 3.)

## Who is Actively Supporting Efforts on Third-Party Certification?

The Initiative for Responsible Mining Assurance (IRMA) is the only existing initiative that we are aware of that is seeking to develop independent, third-party certification of more responsible large-scale mining. We awarded points for jewelers who are actively participating in IRMA and efforts to develop third-party certification of minerals.

## Who signed the Bristol Bay Protection Pledge?

The watershed of Bristol Bay in Alaska is threatened by the proposed Pebble copper-gold mine. The Bristol Bay Pledge is a commitment by jewelers to not source metals from mines that would threaten Bristol Bay (See Box 2). We consider signing the Bristol Bay Protection Pledge to be an important indication of a jeweler's commitment to responsible sourcing, and jewelers who have signed the pledge received an extra point. To date, some twenty large and smaller jewelers have taken this important step.

## What other steps did jewelry retailers take?

Some jewelry retailers such as Birks & Mayors and Tiffany & Co. have taken additional implementation steps towards responsible mining, including supporting the Boreal Forest Conservation Framework, supporting responsible mining law reform, maximizing material and energy efficiency and using renewable energy at facilities, among others. (See Box 4.) These retailers received a point for such important additional steps. Retailers who are developing supply traceability mechanisms received a half point.



Bristol Bay watershed.  
PHOTO: © 2009 Robert Glenn Ketchum [www.robertglennketchum.com](http://www.robertglennketchum.com)

## BOX 2—The Bristol Bay Protection Pledge

The Bristol Bay Protection Pledge is a commitment that jewelers have made to support the protection of Bristol Bay in Alaska, which is threatened by large-scale mining projects. Such mining projects include the proposed Pebble mine, a massive copper/gold mine proposed in southwest Alaska at the headwaters of Bristol Bay, the world’s largest remaining wild sockeye salmon fishery.

The mine, planned by Northern Dynasty and Anglo American, would be the biggest mine in North America, with an estimated footprint of 30 square miles. Based on current projections, the mine would generate 8-9 billion tons of mine waste.<sup>10</sup> The tailings waste would be stored in perpetuity at the headwaters of Bristol Bay in a seismically active area behind earthen dams. The mine has proposed to use nearly 35 billion gallons of water a year and scientists say that this would dewater key salmon spawning streams.<sup>11</sup> It would also require the construction of a 100-mile road, and a massive power plant.<sup>12</sup>

Alaska native communities and commercial fishermen, who rely on the sustainable salmon fishery for their way of life and livelihoods, strongly oppose the mine.

Some 20 leading jewelry retailers have also expressed their opposition to the mine, recognizing that the Bristol Bay watershed is an ecosystem of international significance and that much of the area is designated a Fishery Reserve. Many have now signed the Bristol Bay Pledge to show their support for protection of the Bristol Bay watershed.

Retailers that have signed the Bristol Bay Protection Pledge have stated that they do not want to sell jewelry that comes from a mine, like the Pebble mine, that would jeopardize Bristol Bay. The jewelers have stated that they “support permanent protection of the Bristol Bay Fishery Reserve from large-scale metals mining.”

For more information, see [www.ourbristolbay.com/](http://www.ourbristolbay.com/) and [www.nodirtygold.org/CV\\_BristolBay.cfm](http://www.nodirtygold.org/CV_BristolBay.cfm)



## BOX 3—Recycling as Responsibility

Using recycled precious metals for jewelry is an important way for jewelers to source precious metals more responsibly. Precious metals that have already been used in some way, including “vintage,” “renewed,” or “reclaimed” metals from jewelry and electronics, are not directly implicated in the destructive impacts of mining. They do not share responsibility for the impacts of mining in the same way that newly mined gold does.

A number of retailers, including Brilliant Earth, Lena Marie Echelle, Real Jewels, Leber Jeweler, Alberto Parada, Reflective Images, Nature’s Candy, and Toby Pomeroy, report that they are sourcing precious metals primarily from recycled content, although some have struggled to find sources of recycled metal jewelry components. A number of other jewelers such as Herff Jones, April Doubleday, and Security Jewelers report sourcing a large part of their metals from recycled components.

Some have expressed concern that using more recycled precious metals may concentrate recycled demand into the jewelry sector and just raise demand for newly mined gold from electronics companies or other users of precious metals. But using recycled metals helps promote recycling of metals in products such as electronics that might otherwise end up in landfills, and sends a powerful signal to the marketplace about the desire for cleaner alternatives to dirty gold.

Recycling, of course, has to be done in a responsible way as well. Workers at recycling facilities must have safe working conditions and their rights must be respected. The recycling process should not expose workers and the environment to toxic chemicals. A third-party, independent system of standards and verification is necessary to establish that a company is recycling precious metals responsibly. Those standards should also address what qualifies as “recycled” since various definitions are used.

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Acid mine drainage at the Summitville gold mine Superfund site in Colorado. PHOTO: U.S. Environmental Protection Agency



Large jewelers who signed the Golden Rules (GR) received grades between “B” and “F” for their efforts towards implementation of the Golden Rules

### Table 1

THE REPORT CARD

Large jewelers who signed the Golden Rules (GR) received grades between “B” and “F” for their efforts towards implementation of the Golden Rules. Jewelers that implemented a Golden Rules condition received one point, those that partially met a condition received half of a point, and those that did not meet the requirement received zero points. No points were entered where jewelers did not respond to a survey question. Information is based on jewelers’ self-reporting in response to No Dirty Gold (NDG) surveys and evaluations.

Ratings are:  
0 points, 0.5 points, and 1 point.

	Birks & Mayors	Tiffany & Co.	Herrf Jones	Boscov's	Commemorative Brands	Boucheron	Wal-Mart	Jostens	Zale Corp.	Cartier	JCPenney	Ben Bridge Jeweler	Helzberg Diamonds	OVC	Van Cleef & Arpels	Piaget	Signet Group	Fred Meyer & Littman Jtrs.	Intergold	
Signed Golden Rules? <sup>1</sup>	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Responded to survey? <sup>2</sup>	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0
Conducted supply audit? <sup>3</sup>	1	1	1	1	1	0.5	0.5	1			0		0							0
Audit included mine/recycled refinery?	1	0																		
Shared audit/ sourcing with NDG? <sup>3</sup>	1	0		1	0	0	0	0	0.5	0.5	0	0	0							0
Evaluation: sourcing reflects GR? <sup>4</sup>	0.5								0.5	0.5										
Policies & contracts reflect GR?	1	0	1	1	1	0.5														
Policies shared with NDG or public?							1													
Evaluation: policies reflect GR? <sup>5</sup>							0.5		0.5											
Informed suppliers of intent?	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
GR in contract language? <sup>6</sup>	1	0	1	1	1	0.5		0		0	0									
Targets for increasing recycled content? <sup>7</sup>	1	0.5	1	1	1	1	1	0			0	0	0							0
Increased % of recycled content? <sup>8</sup>		1	1	1	1	0		0			1	0								0
Participating in third-party certification? <sup>9</sup>	0	1	0	0		0.5	0.5	0	0	0	0	0	0							0
Signed Bristol Bay Protection Pledge? <sup>10</sup>	1	1	1	0	1	0	0	1	0	0	0	1	1	0	0	0	0	0	0	0
Other implementation steps taken? <sup>10</sup>	1	1		0	0.5	0.5					1	0.5								
<b>Total score</b>	<b>10.5</b>	<b>9.0</b>	<b>8.0</b>	<b>7.0</b>	<b>6.5</b>	<b>6.0</b>	<b>6.0</b>	<b>5.0</b>	<b>4.5</b>	<b>4.0</b>	<b>4.0</b>	<b>4.0</b>	<b>3.5</b>	<b>3.0</b>	<b>3.0</b>	<b>3.0</b>	<b>3.0</b>	<b>2.0</b>	<b>2.0</b>	<b>1.0</b>
<b>Grade</b>	<b>B</b>	<b>B</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>D</b>	<b>D</b>	<b>D</b>	<b>D</b>	<b>D</b>	<b>D</b>	<b>D</b>	<b>D</b>	<b>D</b>	<b>D</b>	<b>D</b>	<b>F</b>

<sup>1</sup> Jewelers that signed the Golden Rules principles for more responsible mining received a point.  
<sup>2</sup> Jewelers that were still in the audit process when they reported, or who audited some of their supply, received half a point for their supply chain audit.  
<sup>3</sup> Jewelers that only shared a small portion of their supply chain information received a half point.  
<sup>4</sup> Jewelers with a reported sourcing in apparent accordance with the Golden Rules received a point. Jewelers with a component of their reported point. Jewelers with a component of their reported

sourcing apparently in accordance with the Golden Rules, and/or with sourcing that was seemingly close to but not entirely in accordance with the Golden Rules, received a half point.  
<sup>5</sup> Jewelers with shared or public policies in accordance with the Golden Rules received a point. Jewelers with shared or public policies partially in accordance with the Golden Rules received a half point.  
<sup>6</sup> Jewelers who established a timeline for including the

Golden Rules in new contracts received a half point.  
<sup>7</sup> Jewelers received a point if they reported having set targets for increasing recycled precious metal content in their jewelry.  
<sup>8</sup> Jewelers also received a point if they reported already using significant recycled content.  
<sup>9</sup> Jewelers actively participating in third-party certification efforts (such as IRMA) inclusive of multiple stakeholders, including civil society received a point. Jewelers having contributed resources or

having been listed as formal participants in IRMA beyond involvement through associations received a half point.  
<sup>10</sup> Jewelers taking additional implementation steps, including supporting the Boreal Forest Conservation Framework, supporting responsible mining law reform, maximizing material and energy efficiency and using renewable energy at facilities, among others, received a point. Developing supply traceability mechanisms received a half point.

## BOX 4 —Sourcing from Small-scale Mines

A number of jewelers have sought out more responsible sources of precious metals from artisanal and small-scale mining projects. Jewelers such as CRED, April Doubleday, Fair Trade in Gems and Jewelry, Fifi Bijoux, and Open Source Minerals report that they are sourcing primarily from small-scale mining operations. Other jewelers, including Cartier, Brilliant Earth, and Ingle & Rhode, report that they have included some small-scale mining metals in their jewelry products.

Small-scale mining, when undertaken responsibly, has the potential to assist economic development in regions with little infrastructure. Small-scale mining that does not occur in conflicts zones, that is community-based and cooperative, that is relatively safe, that does not use toxic chemicals, that

does not occur in protected and sensitive areas, and that protects and restores natural habitat and water quality can potentially represent a beneficial activity for a community.

Unfortunately, not all artisanal and small-scale precious metals mining fits this bill. Small-scale gold mining contributes to conflict in places such as the Democratic Republic of the Congo, can be associated with child labor, dangerous work, and can destroy forests and stream beds. Use of mercury or cyanide by small-scale miners can contaminate the environment and poison workers.

In order to help distinguish between more and less responsible small-scale and artisanal mining operations, several initiatives have sought to establish standards for responsible

small-scale mining. As part of EARTHWORKS' contribution to the work of the Madison Dialogue, we have compared the standards of several of those initiatives. (See [www.nodirtygold.org/responsibleasm.cfm](http://www.nodirtygold.org/responsibleasm.cfm)) Although none of the initiatives we examined represented best practice in the sector, several advanced a number of important standards. Some of the jewelers that we surveyed are seeking to source from some of the more responsible of these initiatives.

Top: Sedimentation from small-scale gold mining in French Guiana.  
Bottom: Panning for gold in the Canadian Yukon.

PHOTOS: Ludovic Salomon, and Janothird, Creative Commons Attribution-Share Alike 3.0



Small and medium-sized jewelers who signed the Golden Rules (GR) received grades between “A” and “D” for their efforts towards implementation of the Golden Rules.

## Table 2

## THE REPORT CARD

Small and medium-sized jewelers who signed the Golden Rules (GR) earned grades between “A” and “D” for their efforts towards implementation of the Golden Rules. Jewelers that met a Golden Rules implementation condition received one point, those that partially met a condition received half of a point, and those that did not meet the requirement received zero points. No points were entered where jewelers did not respond to a survey question. The Information is based on jewelers self-reporting in response to No Dirty Gold (NDG) surveys and evaluations.

Ratings are:  
0 points, 0.5 points, and 1 point.

	Brilliant Earth	Cred Jewellery	Lena Marie Echelle Designs	Real Jewels	April Doubleday	Fair Trade in Gems and Jewellery	Fifi Bijoux	Leber Jeweler	Alberto Parada	Reflective Images	Nature's Candy Designs	Open Source Minerals	Ingle & Rhode	Henrich & Denzel GmbH	Fey & Co. Jewelers	Hacker Jewelers	Stephen Fortner	Toby Pomeroy	Van Gundy	Security Jewelers	Michaels Jewelers
Signed Golden Rules? <sup>1</sup>	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Responded to survey?	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Conducted supply audit? <sup>2</sup>	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0.5	1	0	0	0	0	0
Audit: included mine/recycled refinery?	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Shared audit/ sourcing with NDG? <sup>3</sup>	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	0	1	0	1	0	0
Evaluation: sourcing reflects GR? <sup>4</sup>	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0.5	1	0
Policies & contracts reflect GR?	1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	1	1	1	1	0	0
Policies shared with NDG or public?	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0
Evaluation: policies reflect GR? <sup>5</sup>	1	0.5	0.5	0.5	0.5	0.5	0.5	1	1	1	1	0.5	0.5	1	1	1	1	0.5	1	1	0
Informed suppliers of intent?	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	1	1	1
GR in contract language? <sup>6</sup>	1	1	1	1	0	1	1	1	1	1	1	0	1	1	1	1	1	0	0	0	0
Targets for increasing recycled content? <sup>7</sup>	1	1	1	1	1	0	1	1	1	1	1	1	0	1	1	1	1	1	0	0	0
Increased % of recycled content? <sup>8</sup>	0	1	1	1	1	0	0	1	0	1	1	0	0	1	1	1	1	1	1	1	0
Participating in third-party certification? <sup>9</sup>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Signed Bristol Bay Protection Pledge?	1	0	0	0	1	0	1	1	0	0	0	0	0	0	1	0	0	0	0	0	0
Other implementation steps taken? <sup>10</sup>			1		1	1	0.5	0	1	1							0.5				
<b>Total score</b>	<b>13</b>	<b>12.5</b>	<b>12.5</b>	<b>12.5</b>	<b>11.5</b>	<b>11.5</b>	<b>11.5</b>	<b>11.5</b>	<b>11</b>	<b>11</b>	<b>10</b>	<b>10</b>	<b>9.5</b>	<b>8</b>	<b>7</b>	<b>6.5</b>	<b>6</b>	<b>6.5</b>	<b>5.5</b>	<b>3.5</b>	<b>3</b>
<b>Grade</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>D</b>	<b>D</b>

<sup>1</sup> Jewelers that signed the Golden Rules principles for more responsible mining received a point.  
<sup>2</sup> Jewelers who were still in the audit process when they reported, or who audited some of their supply, received half a point for their supply chain audit.  
<sup>3</sup> Jewelers that only shared a small portion of their supply chain information received a half point.  
<sup>4</sup> Jewelers that reported sourcing in apparent accordance with the Golden Rules received a point. Jewelers with a component of their reported

sourcing apparently in accordance with the Golden Rules, and/or with sourcing that was seemingly close to but not entirely in accordance with the Golden Rules, received a half point.  
<sup>5</sup> Jewelers with shared or public policies in accordance with the Golden Rules received a point. Jewelers with shared or public policies partially in accordance with the Golden Rules received a half point.  
<sup>6</sup> Jewelers who established a timeline for including the

Golden Rules in new contracts received a half point.  
<sup>7</sup> Jewelers received a point if they reported having set targets for increasing recycled precious metal content in their jewelry.  
<sup>8</sup> Jewelers also received a point if they reported already using significant recycled content.  
<sup>9</sup> Jewelers actively participating in third-party certification efforts (such as IRMA) inclusive of multiple stakeholders, including civil society received a point.

<sup>10</sup> Jewelers taking additional implementation steps, including supporting the Boreal Forest Conservation Framework, supporting responsible mining law reform, maximizing material and energy efficiency and using renewable energy at facilities, among others, received a point. Developing supply traceability mechanisms received a half point.





# IV. Appendices

## Appendix I. Template of survey sent to jewelry retailers

No Dirty Gold Survey on Retailer Implementation of the Golden Rules. February 2009

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### 1. Signing the Golden Rules

Has your company signed the Golden Rules for responsible sourcing of gold and precious metals?

### 2. Supply chain audit

A) Has your company completed a supply-chain audit for your supply of gold and precious metals? Does this include information about how those materials are mined, refined, and used to manufacture jewelry?

B) Have you shared the results of these audits with the No Dirty Gold campaign? If not, we request that you do so on returning this survey. Note: Kindly indicate if any of this information is confidential and not for publication.

### 3. Internal policies and supplier contracts

A) Have you revised company policies, contracts, or internal auditing measures to reflect the Golden Rules criteria? We would appreciate it if you would share your policies on precious metals sourcing with the respect to the Golden Rules with the No Dirty Gold campaign.

B) Have you informed your suppliers that you intend to purchase metals from sources that meet the Golden Rules criteria?

C) Have you included relevant language about these criteria in contracts with suppliers?

### 4. Recycled metal content

A) Has your company set targets for increasing the proportion of recycled precious metals in your products?

B) Has your company increased the proportion of recycled precious metals in your products?

### 5. Third-party certification and additional steps

A) Has your company worked to support development of third-party certification systems for responsible sourcing of minerals through the Initiative for Responsible Mining Assurance (IRMA) or through efforts developing from the Madison Dialogue Working Groups on recycled precious metals and artisanal and small-scale mining of precious metals?

B) Has your company taken any other steps towards implementing the Golden Rules, such as signing on to the Bristol Bay Protection Pledge? Please provide examples.

C) How can the No Dirty Gold campaign better support your efforts to implement the Golden Rules? Please let us know if there is additional information, expertise or initiatives that we can provide to assist in your efforts to source more responsibly produced metals.

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## Appendix 2. List of surveyed jewelers

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### Golden Rules signatories that responded to the survey:

Alberto Parada	Fred Meyer and Littman Jewelers	QVC
April Doubleday	Hacker Jewelers	Real Jewels
Ben Bridge Jeweler	Helzberg Diamonds	Reflective Images
Ben Bridge Jeweler	Henrich & Denzel GmbH	Security Jewelers
Birks & Mayors	Herff Jones	Signet Group
Boscov's	Ingle & Rhode	Stephen Fortner
Boucheron	JCPenney	Tiffany & Co.
Brilliant Earth	Jostens	Toby Pomeroy
Cartier	Leber Jeweler	Van Cleef & Arpels
Commemorative Brands	Lena Marie Echelle Designs	Van Gundy
Cred Jewellery	Michaels Jewelers	Wal-Mart
Fair Trade in Gems and Jewelry	Mike Angenent/Open Source Minerals	Zale Corp.
Fey & Co. Jewelers	Nature's Candy Designs, Ltd.	
Fifi Bijoux	Piaget	

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### Golden Rules signatories that did not respond:

Intergold

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### Major jewelers with annual sales over \$100 million (2007 sales) who received the survey although they were not Golden Rules signatories at the time:

Amazon.com	Harry Winston Diamond Corp.	Rogers Enterprises
Army/Air Force Exchange Service	Home Shopping Network – Interactive	Ross-Simons
Bidz.com	Jewelry Television (Amer. Collectibles Network)	Saks Inc.
Blue Nile, Inc. – subsequently signed on to the Golden Rules	Kohl's Corp.	Sears, Roebuck and Co. – subsequently signed on to the Golden Rules
Carlyle & Co.	Macy's East	Shop NBC
Costco	Macy's West	T.J. Maxx
Finlay Enterprises, Inc.	Meijer Inc.	Target Corp.
Gitanjali USA	Neiman Marcus	Tourneau
Goldenwest Diamond Corp.	Reeds Jewelers	Ultra Stores, Inc. – subsequently signed on to the Golden Rules
Hannoush Jewelers	Robbins Bros.	

# Endnotes

- <sup>1</sup> 20 tons figure calculated using publicly reported data from mining companies, and data published by [www.infomine.com](http://www.infomine.com) and the US Geological Survey, <http://minerals.usgs.gov/minerals/>; Number one polluter from U.S. Environmental Protection Agency. 2009. *Toxics Release Inventory*, Reporting Year 2008 National Analysis. Summary of Key Findings. US EPA Office of Information Analysis and Access. December 2009; Cyanide use based on data from Gavin Mudd, *Global trends in gold mining: Towards quantifying environmental and resource sustainability?* Resources Policy 32, pp. 42-56 (2007).
- <sup>2</sup> World Gold Council, *Gold Supply and Demand*, 2009, based on data from GFMS. <http://www.research.gold.org/>
- <sup>3</sup> National Jeweler 2007 \$100 Million Supersellers 16 May, 2008
- <sup>4</sup> Michael E. Conroy, *Branded! How the Certification Revolution is Transforming Global Corporations*, New Society Publishers, 2007.
- <sup>5</sup> For more information, see the IRMA website: <http://www.responsiblemining.net>
- <sup>6</sup> For more information, see the RJC website: <http://www.responsiblejewellery.com>
- <sup>7</sup> See CAFOD, Canadian Boreal Initiative, EARTHWORKS, et al., “Mining and Jewelry Self-Certification Falls Short, Groups Say,” 21 December, 2009. Available at: [http://earthworksaction.org/PR\\_RJC\\_FallsShort.cfm](http://earthworksaction.org/PR_RJC_FallsShort.cfm)
- <sup>8</sup> The following other retailers did not respond to or acknowledge receipt of the survey: Amazon.com, Army/Air Force Exchange Service, Bidz.com, Carlyle & Co., Costco, Finlay Enterprises, Inc., Goldenwest Diamond Corp., Hannoush Jewelers, Home Shopping Network, Kohl’s Corp., Meijer Inc., Neiman Marcus, Reeds Jewelers, Robbins Bros., Rogers Enterprises, Ross Simons, Saks Inc., Shop NBC, and Tourneau.
- <sup>9</sup> Michael E. Conroy, *Branded! How the Certification Revolution is Transforming Global Corporations*, New Society Publishers, 2007.
- <sup>10</sup> 8-9 billion tons from Northern Dynasty Minerals factsheet, <http://www.northerndynastyminerals.com/ndm/Home.asp>
- <sup>11</sup> 35 billion gallons of water from Alaska Department of Natural Resources, *Complete Water Right Applications submitted by Northern Dynasty Mines Inc.*, <http://dnr.alaska.gov/mlw/mining/largemine/pebble/waterapp.htm>.  
Dewatering impacts from William J. Hauser, *Potential Impacts of the Proposed Pebble Mine on Fish Habitat and Fishery Resources of Bristol Bay*, September 2007.
- <sup>12</sup> Tim Bradner, “Pebble Mine Construction Now Estimated at \$6 Billion,” *Alaska Journal of Commerce*, Anchorage, 19 October 2008, available at [http://alaskajournal.com/stories/101908/hom\\_2008101938.shtml](http://alaskajournal.com/stories/101908/hom_2008101938.shtml)



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