

**To:** SAASTAMOINEN Salla (JUST); [REDACTED] PERIGNON  
Isabelle (CAB-REYNDERS); BUSA Lucrezia (CAB-REYNDERS); [REDACTED]  
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**Cc:** [REDACTED]  
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**Subject:** Report: virtual meeting with the European Federation of Jewellery on due diligence in the supply chains, 27 November 2020

Sent on behalf [REDACTED]

**Report: virtual meeting with the European Federation of Jewellery on due diligence in the supply chains, 27 November 2020**

**Participants:**

- European Federation of Jewellery (EFJ) representatives [REDACTED]  
[REDACTED]  
[REDACTED]
- Commission: Geneviève Tuts (Head of Cabinet of Commissioner Reynders); [REDACTED]  
[REDACTED]

The virtual meeting took place at the request of the European Federation of Jewellery, existing since 2013 and bringing together 5 national federations from 4 EU countries (Belgium, France, Italy, Portugal), to exchange views on the planned EU rules on due diligence as part of the Commission's sustainable corporate governance initiative.

The Federation is, in general, supportive of an EU-wide, cross-sectoral due diligence obligation, as they have communicated this in their position paper published in September 2020. Their support is also explained by the fact that customers are becoming more conscious about environmental and human rights harm.

At the same time, the Federation has concerns and proposals regarding future EU legislation. At the meeting they presented their position pointing at the importance of coherence with existing due diligence frameworks and the Responsible Jewellery Council's Code of Practices, proportionality and

additional support for SMEs, and a level playing field for EU and non-EU companies active in the EU. The Federation also stressed that due diligence should cover all aspects, incl. environmental, human rights, social and also governance aspects, but the applicable international treaties and conventions should be listed for clarity. They also prefer rewarding over sanctioning in the first period of application. In Italy, which is the most significant EU country in this market, the average size of companies in the sector is 4 to 5 employees, so the sector requires a pragmatic approach.

Ms Tuts referred to the initiative as top priority for the Commission. She explained that we are still in the consultation phase but our goal is to submit an ambitious proposal to the Council and the EP. She briefly explained the main possible elements of the initiative, confirming that we are exploring how to reflect on a number of points raised by the Federation.