# CONVENTION ON THE CONTROL AND MARKING OF ARTICLES OF PRECIOUS METALS

PMC/W 1/2001 (Rev. 24)
2 Annexes
1 January 2025

# COMPILATION OF ACTS

# OF THE STANDING COMMITTEE

Adopted by the Standing Committee
at its fifty-first meeting in Lisbon on 2 October 2001

Entered into force on 1 January 2002

Last amended by the Standing Committee on 13 December 2024*

The following is a compilation of all the acts and recommendations of the Standing Committee relating to the securing of uniform interpretation and application of the provisions of the Convention.

English version



* With entry into force on 1 January 2025

# Table of Contents

* Issued as a separate document (see PMC/W 3/2007 (latest revision))

# Section 1: Membership

## 1.1 CONTRACTING STATES OF THE CONVENTION ON THE CONTROL AND MARKING OF ARTICLES OF PRECIOUS METALS

List of signatures and ratifications or accessions with respect to the Convention on the Control and Marking of Articles of Precious Metals, done at Vienna on 15 November 1972

| State | Signature | Ratification/ Accession | Entry into force | Amendments | |
|---|---|---|---|---|---|
| | | | | 1988 | 2001 |
| Austria | 15.11.1972 | 12.02.1974 | 27.06.1975 | X | X |
| Croatia | | 27.10.2017 | 19.03.2018 | X | X |
| Cyprus | | 17.10.2006 | 17.01.2007 | X | X |
| Czech Republic | | 02.08.1994 | 02.11.1994 | X | X |
| Denmark | | 17.11.1987 | 17.01.1988 | X | X |
| Finland | 15.11.1972 | 09.01.1975 | 27.06.1975 | X | X |
| Hungary | | 1.12.2005 | 1.03.2006 | X | X |
| Ireland | | 08.08.1983 | 08.11.1983 | X | X |
| Israel | | 01.03.2005 | 01.06.2005 | X | X |
| Italy | | 15.09.2023 | 15.12.2023 | X | X |
| Latvia | | 29.04.2004 | 29.07.2004 | X | X |
| Lithuania | | 04.05.2004 | 04.08.2004 | X | X |
| Netherlands | | 16.04.1999 | 16.07.1999 | X | X |
| Norway | 15.11.1972 | 01.07.1983 | 01.09.1983 | X | X |
| Poland | | 22.08.2005 | 22.11.2005 | X | X |
| Portugal | 15.11.1972 | 06.07.1982 | 06.09.1982 | X | X |
| Serbia | | 24.03.2020 | 24.06.2020 | X | X |
| Slovak Republic | | 06.02.2007 | 06.05.2007 | X | X |
| | | | | | Cont'd |

| State | Signature | Ratification/ Accession | Entry into force | Amendments | |
|---|---|---|---|---|---|
| | | | | 1988 | 2001 |
| Slovenia | | 5.12.2008 | 5.03.2009 | X | X |
| Sweden | 15.11.1972 | 27.02.1975 | 27.06.1975 | X | X |
| Switzerland | 15.11.1972 | 01.04.1974 | 27.06.1975 | X | X |
| United Kingdom | 15.11.1972 | 01.04.1976 | 01.06.1976 | X | X |

## 1.2 NATIONAL AUTHORISED ASSAY OFFICES DESIGNATED UNDER THE PRECIOUS METALS CONVENTION

For the exact co-ordinates of the National Authorised Assay Offices (incl. contact details), see https://hallmarkingconvention.org/en/members

| | |
|---|---|
| **Austria** | Kompetenzzentrum Punzierungskontrolle<br>Edelmetallkontroll-Labor<br>VIENNA |
| **Croatia** | State Office for Metrology<br>Division for Precious Metals Articles<br>ZAGREB |
| **Cyprus** | Cyprus Organisation for the Hallmarking of Articles of Precious Metals<br>ARADIPPOU |
| **Czech Republic** | Puncovni Urad<br>PRAHA |
| **Denmark** | FORCE Technology<br>Aedelmetalkontrollen<br>BRONDBY |
| **Finland** | - |
| **Hungary** | Department of Trade, Defence Industry, Export Control and Precious Metal Assay<br>BUDAPEST |
| **Ireland** | Assay Office<br>DUBLIN |
| **Israel** | Standards Institution of Israel<br>Precious Metals Section<br>TEL AVIV |
| **Italy** | Ufficio del Saggio della Camera di Commercio di Alessandria-Asti<br>All Marks<br>VALENZA (AL) |
| | Ufficio del Saggio della Camera di Commercio di Arezzo-Siena<br>S.A.G.O.R. – Servizio Analisi e Garanzia per l'Oreficeria<br>AREZZO (AR) |
| | Ufficio del Saggio della Camera di Commercio di Vicenza<br>Laboratorio Metalli Preziosi<br>ALTAVILLA VICENTINA (VI) |

| | |
|---|---|
| **Latvia** | Assay Office of Latvia<br>RIGA |
| **Lithuania** | Lietuvos prabavimo rūmai<br>DRUSKININKAI |
| **Netherlands** | WaarborgHolland B.V.<br>GOUDA |
| | Edelmetaal Waarborg Nederland B.V.<br>JOURE |
| **Norway** | Justervesenet (Norwegian Metrology Service)<br>KJELLER |
| **Poland** | Regional Assay Office in Warsaw and branches: |
| | - Assay Office of Białystok |
| | - Assay Office of Bydgoszcz |
| | - Assay Office of Gdańsk |
| | - Assay Office of Łódź |
| | Regional Assay Office in Krakow and branches: |
| | - Assay Office of Chorzów |
| | - Assay Office of Częstochowa |
| | - Assay Office of Poznań |
| | - Assay Office of Wrocław |
| **Portugal** | Imprensa Nacional - Casa da Moeda, S.A.<br>Unidade das Contrastarias<br>Contrastaria de LISBOA |
| | Imprensa Nacional - Casa da Moeda, S.A.<br>Unidade das Contrastarias<br>Contrastaria do PORTO |
| **Serbia** | Directorate of Measures and Precious Metals<br>BELGRADE |
| **Slovak Republic** | Puncovy urad Slovenskej Republiky<br>BRATISLAVA |
| | Puncovy urad Slovenskej Republiky<br>TRENCIN |
| | Puncovy urad Slovenskej Republiky<br>KOSICE |
| | Puncovy urad Slovenskej Republiky<br>LEVICE |
| **Slovenia** | Urad Republike Slovenije za meroslovje<br>LJUBLJANA |
| | Urad Republike Slovenije za meroslovje<br>CELJE |

| | |
|---|---|
| **Sweden** | RISE Research Institutes of Sweden<br>BORÅS |
| **Switzerland** | Federal Office for Customs and Border Security (FOCBS)<br>Central Office for Precious Metals Control<br>BRÜGG |
| | - Edelmetallkontrolle Biel |
| | - Bureau cantonal du contrôle des ouvrages en métaux précieux, La Chaux-de-Fonds |
| | - Controllo dei metalli preziosi**,** Chiasso |
| | - Contrôle fédéral des métaux précieux**,** Genève |
| | - Contrôle fédéral des métaux précieux**,** Le Noirmont |
| | - Edelmetallkontrolle, Zürich |
| **United Kingdom** | Assay Office London |
| | Sheffield Assay Office |
| | Birmingham Assay Office |
| | Edinburgh Assay Office |

## 1.3 NATIONAL ADMINISTRATIONS

For the exact co-ordinates of the National Administrations (incl. contact details), see https://hallmarkingconvention.org/en/members or on the list of Members of the SC.

| | |
|---|---|
| **Austria** | Bundesministerium für Finanzen<br>VIENNA |
| **Croatia** | State Office for Metrology<br>ZAGREB |
| **Cyprus** | Ministry of Energy, Commerce and Industry<br>NICOSIA |
| **Czech Republic** | Ministry of Industry and Trade<br>PRAGUE |
| **Denmark** | Danish Safety Technology Authority<br>Ministry of Business<br>ESBJERG |
| **Finland** | Ministry of Economic Affairs and Employment<br>HELSINKI |
| | Finnish Safety and Chemicals Agency (Tukes)<br>HELSINKI |
| **Hungary** | Ministry for National Economy<br>BUDAPEST |
| **Ireland** | Department of Enterprise, Trade and Employment<br>DUBLIN |
| **Israel** | Ministry of Economy and Industry<br>RAMAT GAN |
| **Italy** | Ministry of Enterprises and Made in Italy<br>ROME |
| **Latvia** | Ministry of Finance<br>RIGA |
| **Lithuania** | Ministry of Finance<br>VILNIUS |
| **Netherlands** | Ministry of Economic Affairs and Climate Policy<br>THE HAGUE |
| **Norway** | Ministry of Trade, Industry and Fisheries<br>OSLO |
| **Poland** | Ministry of Economic Development and Technology<br>WARSAW |
| **Portugal** | Ministry of Finance<br>LISBON |

| | |
|---|---|
| **Serbia** | Ministry of Economy<br>BELGRADE |
| **Slovak Republic** | Ministry of Economy<br>BRATISLAVA |
| **Slovenia** | Ministry of the Economy, Tourism and Sport<br>Metrology Institute of Republic of Slovenia<br>CELJE |
| **Sweden** | Ministry of Climate and Enterprise<br>STOCKHOLM |
| | SWEDAC (Swedish Board for Accreditation and Conformity Assessment)<br>BORÅS |
| **Switzerland** | State Secretariat for Economic Affairs (SECO)<br>BERN |
| **United Kingdom** | Department of Business and Trade<br>TEDDINGTON |

## 1.4 ASSAY OFFICE MARKS

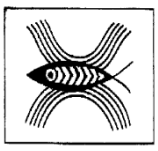
**AUSTRIA**


Gold


Silver

**CROATIA**

Gold



Silver

**CYPRUS**

**CZECH REPUBLIC**

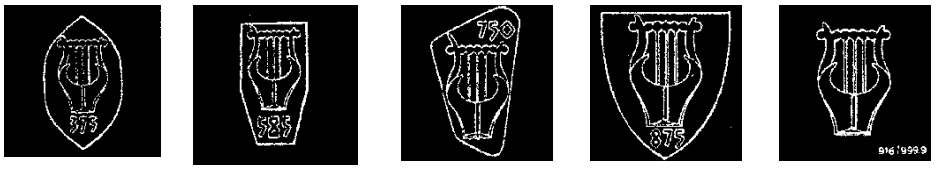
**DENMARK**

**FINLAND**

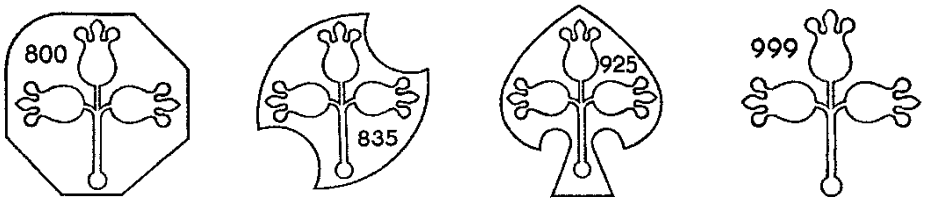
**HUNGARY**

**IRELAND**

GOLD




SILVER




**ISRAEL**


**ITALY**

XX = letters which identify the provincial Assay Office:

| | |
|---|---|
| AL | Alessandria-Asti |
| AR | Arezzo-Siena |
| VI | Vicenza |

| Gold | Silver | Platinum | Palladium |
|---|---|---|---|
|  |  |  |  |

**LATVIA**

**LITHUANIA**

Letter in the left upper corner:

| | | | |
|---|---|---|---|
| D | Druskininkai, central office | L | Klaipéda branch |
| K | Kaunas branch | S | Šiauliai branch |
| V | Vilnius branch | | |

| | | |
|---|---|---|
| WaarborgHolland B.V. | | Edelmetaal Waarborg Netherland B.V. |
| **NETHERLANDS** | | |

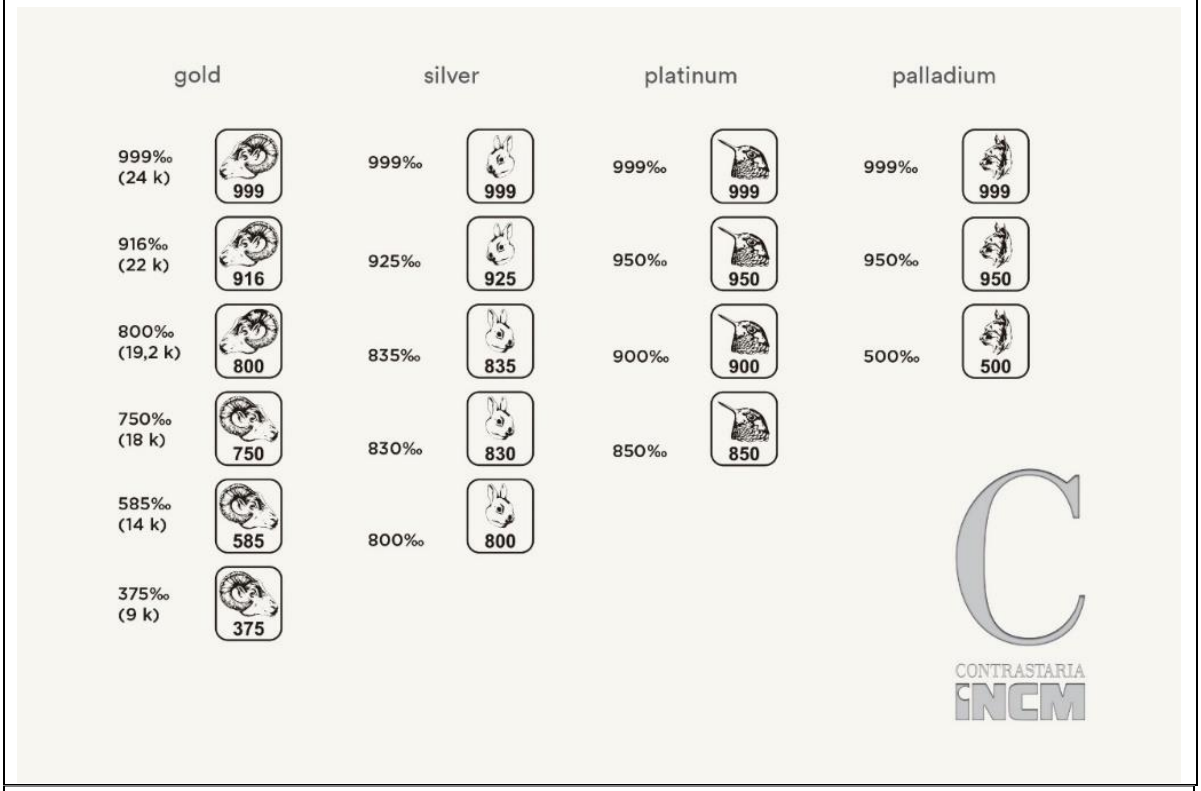
**NORWAY**

X

**POLAND**

X = letter which identifies the local Assay Office:

| | | | |
|---|---|---|---|
| K | Regional Assay Office in Krakow | W | Regional Assay Office in Warsaw |
| H | Assay Office in Chorzów | A | Assay Office in Białymstok |
| Z | Assay Office in Częstochowa | B | Assay Office in Bydgoszcz |
| P | Assay Office in Poznań | G | Assay Office in Gdańsk |
| V | Assay Office in Wrocław | Ł | Assay Office in Łódź |

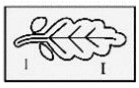



**PORTUGAL**

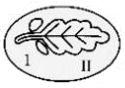
NB: The Portuguese standard of fineness of 830 for silver is not a recognised standard of fineness under the Convention. If applied together with the Common Control Mark, Type 1, it will be considered as an article of standard of fineness of 800.

## PLATINUM


999/1000




950/1000




900/1000


850/1000

## GOLD


999/1000


950/1000


840/1000


750/1000


585/1000


900/1000
(900/1000 - for gold coins, memorial plaques, etc.)

## PALLADIUM


999/1000


950/1000


500/1000

## SILVER


999/1000

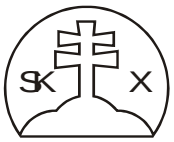

950/1000


925/1000


800/1000

- The Arabic numeral indicates AO (e.g. 1 indicates AO in Belgrade)
- The Roman numeral indicates the standard of fineness

**SERBIA**

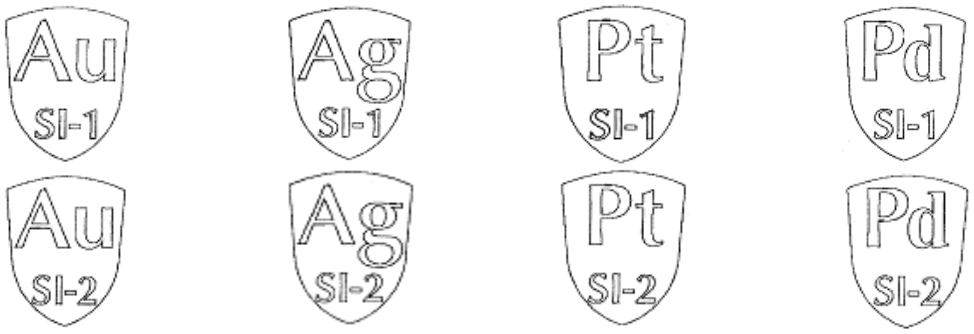



**SLOVAK REPUBLIC**

Letter X will be replaced by the Assay Office's branch identification letter:

| | | | |
|---|---|---|---|
| B | Bratislava | L | Levice |
| K | Kosice | T | Trencin |

Gold Silver Platinum Palladium




**SLOVENIA**

The symbol SI-1 identifies the Assay Office in Ljubljana
The symbol SI-2 identifies the branch office in Celje

2 2

Swedish National Testing and
Research Institute
(SP)

**SWEDEN**

**SWITZERLAND**

The cross (X) in the St. Bernhard's dog stands for any of the following symbols identifying a Swiss Assay Office branch:

| | | | |
|---|---|---|---|
| B | Biel | C | La Chaux-de-Fonds |
| ☆ | Basle | J | Le Noirmont |
| T | Chiasso | Z | Zurich |
| G | Geneva | | |

| | | | |
|---|---|---|---|
|  |  |  |  |
| London | Birmingham | Sheffield | Edinburgh |
| **UNITED KINGDOM** | | | |

## 1.5 OTHER MARKS

This section contains:

A. Other marks, applied by Assay Offices (in line with paragraph 5.3 of Annex II to the Convention) and communicated by Assay Offices to the Secretariat on a voluntary basis;

B. Shields indicating the nature of the precious metal on articles marked with Type 2 of the CCM (in line with paragraph 5.1.3 of the Technical Decisions regarding Annex II).

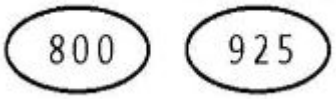
### A. Other marks

-

### B. Shields indicating the nature of the precious metal

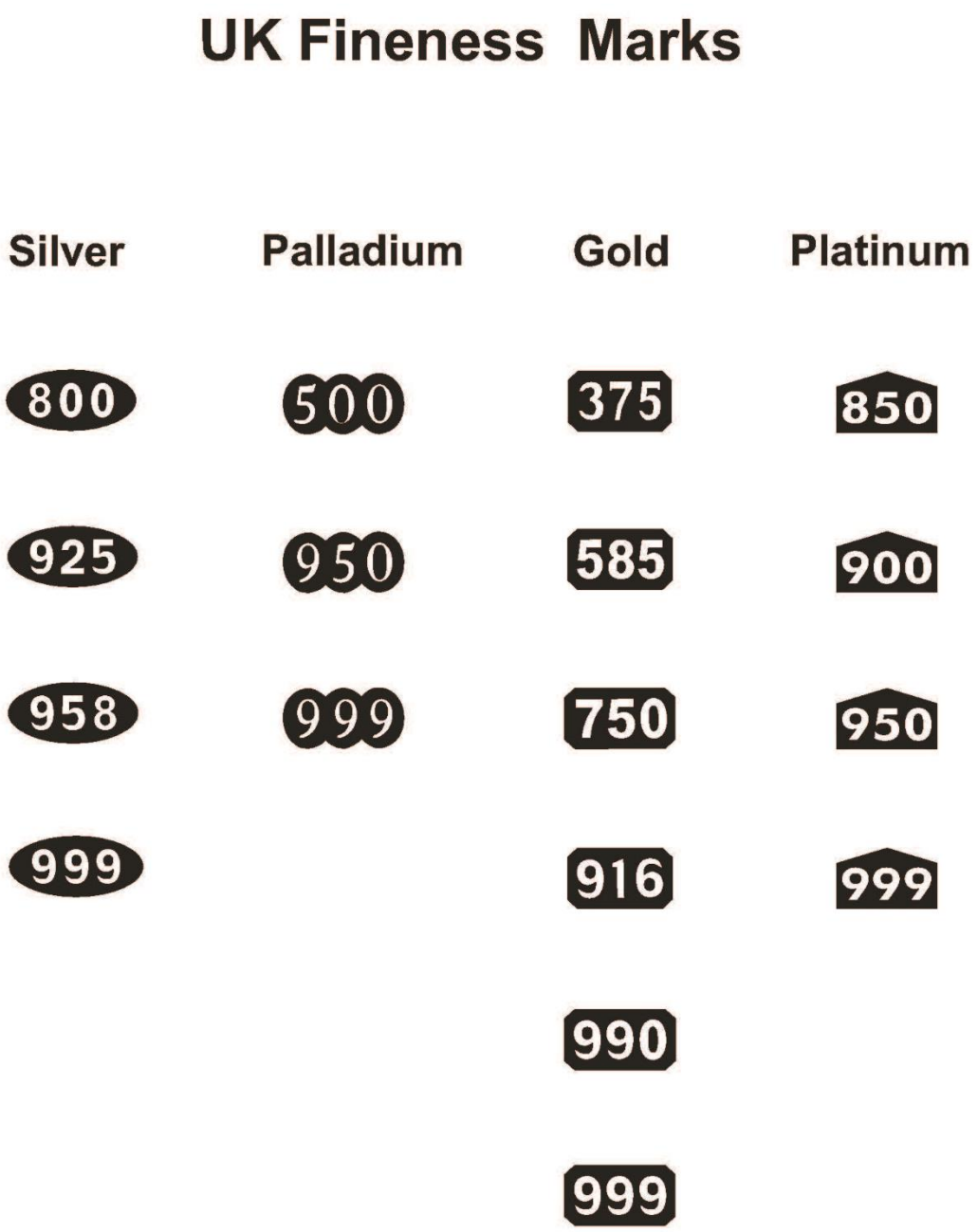
Italy

Shapes of Italian fineness marks, applied by manufacturers on precious metals articles (in line with art. 16, §1, and Annex V, Presidential Decree 30 May 2002, n. 150).

| | |
|---|---|
| Gold (375, 585 and 750) |   |
| Gold (for any fineness above 750) |   |
| Silver (800, 925) |   |
| Platinum (850, 900, 950) |   |
| Palladium (500 and 950) |   |

United Kingdom

UK fineness symbols denoting the metal type and fineness



# Section 2: Accession to the Convention

## 2.1 GUIDELINES FOR ACCESSION TO THE CONVENTION

### Introduction

1. The Convention on the Control and Marking of Articles of Precious Metals (the Precious Metals Convention) is an agreement between Contracting States. It is not an agreement between Assay Offices.

2. A State, which intends to become a party to the Convention, is presumed to have taken all necessary arrangements to effectively apply the requirements of the Convention as from its accession.

3. Formal requests for accession must be made by the intending Contracting States to the Depositary. This is usually done via the Secretariat. However, an Assay Office, which is interested in obtaining the accession procedure details, can also obtain them directly from the Secretariat.

4. Any State or interested party of this State, fulfilling the requirements of Article 12 of the Convention, is entitled to attend meetings of the Standing Committee, subject to the payment of a fee, as defined in the Financial Regulations.

5. To acquire the status of "Applicant State", the concerned State has to express its interest to accede to the Convention (through a letter of intention) and fill in the questionnaire mentioned in paragraph 6 below.

### Accession procedure

6. The Secretariat shall provide an interested country with the standard application form and questionnaire (see Section 2.2) which is also available on the Convention's web site and all appropriate information (i.e. copy of the Convention and Accession Procedure). It shall inform the Standing Committee of the country's interest.

7. The interested State shall return the fill-in questionnaire and all supporting documents to the Secretariat together with a letter of intent (see model letter at Section 2.3). Any State having fulfilled this condition shall have the status of an "Applicant State". It shall attend meetings of the Standing Committee (no voting right) and pay the annual applicant fee, as defined in the Financial Regulations. Non-compliance may lead to the suspension of the status by the Standing Committee.

8. Applicant States should normally be represented by a representative of the Assay Office and a Government representative.

9. The completed application form and questionnaire as well as any supporting document shall be made available to the Standing Committee.

10. Applicant States may request the assistance from Contracting States in preparation for their accession. The Assay Office(s) of Applicant States shall take part in Round Robin (RR, see paragraph 14 below).

11. The Standing Committee shall appoint an Inspection Team which will visit the Applicant State's facilities to (i) clarify its capability of conforming with the Convention's requirements and (ii) to confirm the validity of the accession arrangements. Such a visit may focus inter alia on:

- Legislation and regulation against falsification of marks for precious metals items;
- Organisation, responsibilities and status;
- Methods of sampling, assaying and marking batches of articles of precious metals;
- Analytical methods;
- Keeping of analytical records for hallmarked goods;
- Security system for the marking and storing of punches;
- Staff training programme;
- Possible interlaboratory tests or other assessments of the Assay Office(s);
- Date of implementation of accession arrangements.

12. The visit shall normally not take longer than two days. The programme for the visit shall be prepared by the Applicant State in co-operation with the Secretariat and the Inspection Team.

13. The full cost or a participation of such visits by at most three members of a Standing Committee delegation can be requested from the Applicant State, as the case may be.

14. In the event that (i) the Applicant State has not participated in previous RR or that (ii) the Inspection Team finds the results of previous RR participation inconclusive, the latter may take samples during the visit which shall be analysed by the Applicant State in line with the relevant SOP (see Section 2.5).

15. Accreditation of an Assay Office by an accreditation body that is a signatory to the ILAC MRA to EN or ISO standards will be accepted as an ability to prove conformance. The certificate(s) shall be provided during the visit.

16. The Inspection Team shall submit a report on the visit to the Standing Committee.

17. The Standing Committee shall examine whether the arrangements of the Applicant State comply with the conditions of the Convention and its Annexes and make a recommendation in that respect for consideration by the Contracting States.

18. The recommendation shall be sent by the Depositary to the Contracting States asking them at the same time whether they agree that the Applicant State be invited to accede to the Convention.

19. Upon receipt of the agreement given by all Contracting States, the Depositary shall forward the invitation to the Applicant State.

## 2.2 APPLICATION FORM AND QUESTIONNAIRE

Please provide a complete dossier which supply the information requested with reference to the appropriate questions! All questions must be completed by countries wishing to accede to the Convention.

For a clear understanding of the questions and the terms used, please refer to the Glossary (section 2.4).

*Return Application form & Questionnaire to:*

Secretariat of the Precious Metals Convention
c/o PIC/S
Rue de Saint-Jean 26
CH-1203 Geneva
E-mail: daniel.brunner@picscheme.org

| | |
|---|---|
| 1. | **Applicant State** *(official name of the country)* |
| 1.1 | **Authority which applies on behalf of the State** *(name)* |
| 1.2 | Address |
| 1.3 | Contact person *(name and title)* |
| 1.4 | Phone |
| 1.5 | Fax |
| 1.6 | E-mail |
| 1.7 | Web site |
| 1.8 | Date & Signature |

| | |
|---|---|
| 2. | **General** |
| 2.1 | Supply a complete English translation of your national hallmarking legislation including reference and date of entry into force |
| 2.2 | Which ministry is responsible for hallmarking? |
| 2.3 | How many articles of precious metals did you hallmark in the last calendar year? How many did you reject? |

| | |
|---|---|
| 3. | **Organisation** |
| 3.1 | **Assay Office(s)** |
| 3.1.1 | Is the control and marking of precious metals carried out by Assay Offices? |
| 3.1.2 | Is there a hierarchy among the offices (e.g. main office, regional offices, sub-office)? Please provide an organisation chart. |
| 3.1.3 | Attach a list of offices with addresses |
| 3.2 | **Laboratory** |
| 3.2.1 | Is your laboratory accredited? Please state the standards (e.g. ISO 17025). |
| 3.2.2 | If so, please indicate for which methods of analysis (scope). |
| 3.2.3 | Does your laboratory participate in interlaboratory testing? |
| 3.2.4 | If so, what kind of interlaboratory testing (internal, on national or on international level?) Please provide results obtained during Round Robins during the last two calendar years (compared to the average result) as well as your z-scores. |
| 3.2.5 | Apart of laboratory accreditation, are your Assay Offices accredited for further tasks (e.g. inspection)? |

| | |
|---|---|
| 4. | **Legislation** |
| 4.1 | Do you comply with all parts of Annexes I and II to the Convention? If not, list the paragraphs you do not comply with. |
| 4.2 | To what kind of articles does your legislation not apply? |
| 4.3 | Which standards of fineness are recognised in your legislation? |
| 4.3.1 | For platinum? |
| 4.3.2 | For gold? |
| 4.3.3 | For palladium? |
| 4.3.4 | For silver? |
| 4.4 | What coatings are permitted for articles of precious metals? (precious metals? including rhodium? other coatings like enamel?) |

| | |
|---|---|
| 5. | **Hallmarks** |
| 5.1 | Are your hallmarks protected by law (e.g. criminal law) against forgery and misuse? What are the sanctions? If so, please provide an English translation of the relevant articles. |
| 5.2 | What system (e.g. market surveillance) do you have in place to ensure the protection of hallmarks? |
| 5.3 | Do you have more than one hallmark? Please attach a copy of all the marks used by the Assay Offices in your country. |
| 5.4 | What security measures do you have for keeping your hallmarks safe: |
| 5.4.1 | - for punches? |
| 5.4.2 | - for laser software? |
| 5.5 | Do you already recognise the CCM? If not, will you change your legislation to recognise (and protect) the CCM when joining the Convention? |
| 5.6 | Do you recognise foreign hallmarks (based on a bilateral or multilateral convention) and if so, which ones? |

| | |
|---|---|
| 6. | **Accession Arrangements** |
| 6.1 | How will you ratify the Convention? By government decree? By parliamentary ratification (i.e. by law)? |
| 6.2 | What steps have you already undertaken to ensure the ratification? (e.g. support of other Ministries) |

| | |
|---|---|
| 7. | **Facilities for the Inspection Team** |
| 7.1 | The full cost (or participation) to the 2-day visit by the Inspecting Team can be requested from the Applicant State. What facilities can you extend to the Members of the Inspection Team? |

## 2.3 EXAMPLE OF A LETTER OF INTENT FOR A COUNTRY INTERESTED TO JOIN THE CONVENTION

*[Responsible Ministry]*

Secretariat of the Precious
Metals Convention
c/o PIC/S
Rue de Saint-Jean 26
CH-1203 Geneva

*[place, date]*

Convention on the Control and Marking of Articles of Precious Metals

Dear Sirs,

I have the honour of informing you that *[name of Ministry]*

- herewith expresses the willingness of *[name of State]* to accede the Convention on the Control and Marking of Articles of Precious Metals and apply its provisions as from the date of its entry into force*;*

- confirms that all the arrangements have been or will be taken in order to fulfil all the obligations deriving from the accession to the Convention, and

- will undertake to contribute to the effective operation of the Convention by means of constructive co-operation with the other Members of the Standing Committee.

The duly filled-in application form and questionnaire are attached *[or: will be sent in due time]*. The name and address of the Authorised Assay Office(s) according to Article 5 of the Convention is the following:

*[Assay Office*
*Address*
*Telephone:*
*Fax:*
*E-Mail:]*

*[Signature]*

## 2.4 GLOSSARY

The Glossary contains (i) terms, which appear in the Convention's Annexes, Technical Decision or Compilation of Acts, (ii) commonly used terms in the field of precious metals.

| | |
|---|---|
| ACCURACY | See "measurement accuracy" |
| ALLOY | See "precious metal alloy" |
| ANALYSIS | Determination of the constituent elements of an alloy (The testing of a substance or mixture to determine the amounts and proportions of its chemical constituents) |
| ASSAY | Analysis of a precious metal alloy by a destructive or non-destructive method |
| ASSAY OFFICE | Official control body which assays and usually marks articles of precious metals. An Assay Office must be independent to ensure third-party control. |
| ASSAY OFFICE (AUTHORISED) | An official control body, which has been appointed by a State party to the Precious Metals Convention in line with Article 5 (1). |
| ASSAY OFFICE MARK | Control mark which identifies the Assay Office which undertook the control and which is unique to the Assay Office. The control mark can be a combined control and fineness mark. |
| ASSAYER | Person qualified by education, training and experience to carry out an assay. |
| BASE METAL | All metals except platinum, gold, palladium, and silver (Article 1.7 of Annex I to the Convention) |
| BRANCH OFFICE | A part of an Assay Office which is separate from the main office / headquarters. Normally, a branch office has permanent staff and a distinct Assay Office mark. The assaying (e.g. chemical) may be performed at the main office. See also "Sub-Office". |
| CALIBRATION | (i) "The process of determining the performance parameters of an artefact, instrument, or system by comparing it with measurement standards. Adjustment may be a part of a calibration, but not necessarily. A calibration assures that a device or system will produce results which meet or exceed some defined criteria with a specified degree of confidence." (McGraw-Hill Encyclopaedia of Science and Technology)<br><br>(ii) "A set of operations which, under specified conditions, determines relations between quantitative values indicated by a measuring system (or tested instrument) and corresponding values represented by standards" (T. Juška & Czech Wikipedia)<br><br>(iii) "Operation that, under specified conditions, in a first step, establishes a relation between the quantity values with measurement uncertainties provided by measurement standards and corresponding indications with associated measurement |

| | |
|---|---|
| | uncertainties and, in a second step, uses this information to establish a relation for obtaining a measurement result from an indication." (BIPM[1]) |
| CHIEF ASSAYER | A laboratory manager with appropriate qualification and/or professional experience, who is in charge of running the laboratory, managing and supervising assaying activities including the interpretation of laboratory results. |
| COATING | 1) The process of putting a visible or invisible covering layer over an inner core<br><br>2) The name for a visible or invisible covering layer over an inner core |
| COMMON CONTROL MARK (CCM) | An official control mark, as described in Annex II of the Convention, which is applied by an authorised assay office; which certifies that a precious metal article has been assayed and marked in line with the Convention's requirements; and which indicates (i) that the alloy meets the mini-mum standard of fineness and (ii) the type of metal. |
| CONTROL | Order and regulate the system. (A system for ensuring the maintenance of proper standards in manufactured goods, especially by periodic random inspection of the product) |
| CONTROL MARK | A mark which shows / guarantees that an article of precious metal has been verified by an independent, third party (see also "Hallmark"). |
| DEPARTMENT | Specialised division (operational or functional) within an organisation / government. |
| DEPOSITARY | The Government which is designated under an international treaty and which is entrusted with archiving the said treaty and all ratification instruments |
| DEROGATION | 1) Non-application of a rule in a specific case<br>2) Partial suspension of a legal act |
| ELECTROFORMED ARTICLE | An article built up in layers on a moulded form by electrolytic deposition of the metal. (In line with the Convention's requirements, an electroformed article must be hollow.) |
| EXEMPTION | The act or state of not being covered (e.g. by a regulation) / of being outside the scope (e.g. of the Convention) |
| FILLED ARTICLE | An article filled with a non-metallic substance (e.g. wax) to make it stronger and give it stability. |
| FINENESS | The content of the named precious metals measured in terms of parts per thousand by weight of alloy (Article 1.4 of Annex I to the Convention) |
| FINENESS MARK | A distinctive symbol which indicates the (minimum) purity of a precious metal article (normally in Arabic numerals or in carats) |

[1] International Bureau of Weights and Measures

| | |
|---|---|
| FINENESS MARK (CONVENTION) | A distinctive figure in Arabic numerals which indicates the minimum fineness (for "fineness", see above) |
| GUARANTEE MARK | See "Hallmark" |
| HALLMARK[2] | An official control mark (or combination of marks), applied by a State-appointed, independent assay office. See also "Control Mark". |
| HALLMARKING | The process (i) to assess the conformity of precious metal article and (ii) to certify that it is in compliance with national requirements, which is confirmed by applying a control / guarantee mark. |
| HALLMARKING / MARKING DEPARTMENT | The unit / division within an Assay Office, which is responsible for applying control marks on precious metals articles |
| HALLMARKING SYSTEM | A set of legal prescriptions in a country, which provide for the control / verification of precious metals articles by an independent, third party. The control can be either compulsory (all articles are controlled) or voluntary (only articles presented to the Assay Office are controlled). There are also some hybrid systems (e.g. only gold articles or only watch cases are subject to compulsory control while other precious metals articles are only checked on a voluntary basis). See also "Marking System". |
| INDEPENDENT | Free from the influence, control or authority of any other party (see also ISO 17020 for the definition of an independent inspection body) |
| INSPECTION | Examination of a product design, product, service, process or plant, and determination of their conformity with specific requirements or, on the basis of professional judgement, general requirements (ISO 17020) |
| INSPECTION BODY | Body which performs an inspection (ISO 17020) |
| ISO STANDARD | A standard issued by the International Standards Organisation which is internationally recognised (see also definition of "standard")[3]. |
| LABORATORY (FOR PRECIOUS METALS) | The unit / division within an Assay Office, which is responsible for testing and analysis of precious metals articles, either by destructive or non-destructive methods. |
| LABORATORY MANAGER | See Chief Assayer |
| LASER MARK | A mark(s) applied by a laser rather than by a punch, engraving or casting |

[2] In French: "poinçon de garantie"; in German: "Amtliche Prüfung und Stempfelung".

[3] For Assay Offices, the most common ISO standards are ISO 17020 (inspection), ISO 17025 (analytical testing) and ISO 9001 (quality management).

| | |
|---|---|
| LOT | A collection of units of product from which a sample shall be drawn and inspected to determine conformance with the acceptable criteria, and which may differ from a collection of units designated as a lot for other purposes (for example production, shipment, etc.) (ISO 2859-1) |
| MANUFACTURERS | Person or organisation which produces or assembles a product for sale. |
| MARK | A distinctive feature, sign or character providing information on the article (e.g. maker, fineness, precious metal type, etc.), often applied by the manufacturer on the article. |
| MARKER | Person qualified by training and experience to apply marks and hallmarks. |
| MARKING | The action of applying a mark on a precious metals article |
| MARKING DEPARTMENT | See Hallmarking Department |
| MARKING SYSTEM | A set of legal prescriptions in a country, according to which precious metals articles must be marked with at least the fineness mark and the responsibility mark. See also "Hallmarking System" |
| MARKET SURVEILLANCE | The action which is carried out by public authorities in order to check whether a product on the market (or to be marketed) is in conformity with the relevant regulations and requirements. |
| MEASUREMENT | Process of experimentally obtaining one or more quantity values that can reasonably be attributed to a quantity (BIPM) |
| MEASUREMENT ACCURACY | (i) "Closeness of agreement between a measured quantity value and a true quantity value of a measurand" (BIPM)<br><br>(ii) "Approximation of a measured value and a true value of a measurand" (Guide ISO/IEC 99:2007) |
| MEASUREMENT REPEATABILITY | "Measurement precision under a set of repeatability conditions of measurement" (BIPM) |
| MEASUREMENT REPRODUCIBILITY | "Measurement precision under reproducibility conditions of measurement" (BIPM) |
| MEASUREMENT UNCERTAINTY | "Non-negative parameter characterizing the dispersion of the quantity values being attributed to a measurand, based on the information used" (BIPM) |
| METHOD ROBUSTNESS | The capacity of a method to withstand varying and disturbing conditions (see also "Robust Method"). |
| METHOD OF ANALYSIS | A procedure which is used in order to determine the content of a material. The method can be destructive or non-destructive. |
| MIXED PRECIOUS METAL | An article made of a combination of two or more precious metals, platinum, gold, palladium and silver. |
| MULTIMETAL ARTICLE | An article made of a combination of a precious metal of a legal fineness and non-precious metals (for a more detailed definition, see Article 1.8 of "Technical Decisions regarding Annex I") |

| | |
|---|---|
| NEGATIVE TOLERANCE | A legally defined amount or percentage by which the fineness of a precious metal can be below the stated title and still be hallmarked. |
| OFFICE MARK | See Assay Office mark |
| OFF-SITE MARKING | The authorised assaying and hallmarking of precious metals articles in a sub-office located on a manufacturer / supplier's site within the national boundaries. |
| OFF-SHORE MARKING | The assaying and hallmarking of precious metals articles in a sub-office located on a manufacturer / supplier's site outside the national boundaries (off-shore marking is not permitted under the Convention). |
| PLATING | The coating of precious metals articles (plating is synonymous to coating) |
| PRECIOUS METAL | Platinum, gold, palladium and silver. Platinum is the most precious metal followed by gold, palladium and silver (Article 1.1. of Annex I to the Convention) |
| PRECIOUS METAL ALLOY | A precious metal alloy is a solid solution containing at least one precious metal (Article 1.2 of Annex I to the Convention) |
| PRECIOUS METAL OPERATOR | Individual or company involved in commercial activities of precious metals |
| PROFICIENCY TESTING | (i) An exercise in which a laboratory is subject to a blind evaluation aiming at verifying the level of knowledge and expertise in a particular field. See also "Round Robin".<br><br>(ii) "Evaluation of participant performance against pre-established criteria by means of interlaboratory comparisons" (ISO/IEC 17043:2010) |
| PUNCH | A stamping tool/die used for applying a mark. |
| PURITY | See fineness |
| QUALITY SYSTEM | "The sum of all that is necessary to implement an organisation's quality policy and meet quality objectives. It includes organisation structure, responsibilities, procedures, systems, processes and resources. Typically, these features will be addressed in different kinds of documents as the quality manual and documented procedures, modus operandi etc." (PIC/S[4] PI 002) |
| REFERENCE MATERIAL | "Material, sufficiently homogeneous and stable with reference to specified properties, which has been established to be fit for its intended use in measurement or in examination of nominal properties" (BIPM) |

[4] Pharmaceutical Inspection Co-operation Scheme

| | |
|---|---|
| REFERENCE MATERIAL (CERTIFIED) | "Reference material, accompanied by documentation issued by an authoritative body and providing one or more specified property values with associated uncertainties and traceabilities, using valid procedures" (BIPM) |
| ROBUST METHOD | A procedure which is capable of producing reliable results under varying and perturbing conditions (see also "Method Robustness) |
| RESPONSIBILITY MARK | Under the Convention: a registered symbol which identifies the responsible precious metal operator (e.g. manufacturer or importer) that has produced or submitted the article to the Assay Office. |
| ROUND ROBIN | Sequential or simultaneous interlaboratory proficiency testing scheme on precious metals, during which pieces of homogeneous material are submitted to laboratories for testing (see also "Proficiency Testing") |
| SAMPLER | Person qualified by training and experience to take samples for assaying. |
| SAMPLING | The process or technique of obtaining one or more representative samples. |
| SCREENING | The inspection process of a lot which may consist of one or more of the following operations: e.g. visual inspection, preliminary test, magnetic test, touchstone testing, XRF-examination for homogeneity of lot, testing of scrapings combined from several articles, identification of coating, identification of alloy type. |
| SOLDER | A metal alloy used (in the molten state) for joining metals together |
| SPONSOR | The term used in Ireland and the UK for the responsible precious metal operator. |
| SPONSOR MARK | The mark identifying the sponsor. Equivalent to "responsibility mark". |
| STANDARD | "A published specification that establishes a common language, and contains a technical specification or other precise criteria and is designed to be used consistently, as a rule, a guideline, or a definition" (BSI[5]). See also "ISO Standard". |
| STANDARD OF FINENESS | The minimum content of the named precious metals measured in terms of parts per thousand by weight of alloy (Article 1.5 of Annex I to the Convention) |
| SUB-OFFICE | A satellite office of an Assay Office, located on the premises of a manufacturer / supplier. See also "Branch Office". |
| TOUCH ACID | An acid used to give a good early indication of fineness as part of the screening process. |
| TOUCH ACID TESTING | A testing process using specific acids which when applied to some precious metals gives a good early indication of fineness as part of the screening process |

[5] British Standards Institute

| | |
|---|---|
| TOUCHSTONE | A special stone which when used with precious metals and acids gives a good early indication of fineness as part of the screening process. |
| TOUCHSTONE TESTING | A process using a special stone which when used with precious metals and acids gives a good early indication of fineness as part of the screening process. |
| TRADE | (i) Persons and organisations which derive income from the precious metal industry.<br>(ii) Commercial transaction; the action of buying and selling precious metals articles. |
| VALIDATED METHOD | A procedure which was systematically verified and documented for its performance and robustness within a defined scope |
| VALIDATION | (i) A systematic process determining the degree of conformity of a method<br><br>(ii) "Verification, where the specified requirements are adequate for an intended use" (BIPM) |
| VERIFICATION | "Provision of objective evidence that a given item fulfils specified requirements" (BIPM) |
| X-RAY FLUORESCENCE SPECTROSCOPY (XRF) | A spectroscopic method commonly used for the non-destructive testing of precious metals. |

## 2.5 SOP FOR ANALYTICAL SAMPLES DURING A CONVENTION AUDIT

(as foreseen in paragraph 15 of the Accession Guidelines)

1. The samples shall be selected from available samples of previous Round Robins and tested by the audited laboratory (laboratories) in line with Round Robin Guidelines (see PMC/W 3/2007 – latest revision) unless stated otherwise in this SOP.

2. The audited laboratory (laboratories) shall analyse the item by a standard test method mentioned in the Compilation of Technical Decisions (PMC/W 2/2001 – latest revision).

3. Only alloys of precious metals, which are legal in the country and which are assayed by the audited laboratory (laboratories) (see annual statistics), shall be tested.

4. The results of the analyses shall be reported to the Secretary of the Convention (i) during the Convention's audit for XRF analyses; (ii) latest 5 working days after the audit for chemical analyses.

5. The results shall be communicated on the standard result form, annexed to the RR Guidelines.

6. The results shall be analysed by the Inspection Team, which shall calculate the z-score based on the statistical parameters of the relevant RR compilation. If the latter is unsatisfactory (see box below), the audited laboratory (laboratories) shall conduct a cause analysis in line with the RR Guidelines. Based on the cause analysis, the Inspection Team shall make a recommendation to the Standing Committee.

$|z| \leq 2$ = satisfactory
$2 < |z| < 3$ = questionable
$|z| \geq 3$ = unsatisfactory

7. If there are several independent laboratories in an Acceding State and one of them has not successfully demonstrated its competence in line with the present SOP and the RR Guidelines, the Acceding State – if invited to accede to the Convention – shall refrain from notifying the latter as "authorised Assay Office" in line with Article 5 of the Convention.

## 2.6 GUIDELINES FOR THE ASSESSMENT REQUIREMENTS OF AUTHORISED, INDEPENDENT ASSAY OFFICES

Introduction

1. The present Guidelines have been drafted in order to assist the Inspection Team, when visiting an Applicant State, to assess whether an Assay Office (to be authorised) is "independent" in line with the Convention's requirements. The Convention based on the principle of "independent, third-party control" but the requirements are not defined except for the Assay Office staff and management, as introduced in Article 5 (3) of the Convention by the 2001 Amendment.

2. The Guidelines may also be useful to States wishing to accede to the Convention, which – due to historical or cultural reasons – may have a different understanding on "independent, third-party control", as commonly understood by the current Contracting States to the Convention.

3. The Guidelines only apply to Assay Offices, which are in charge of controlling and marking articles of precious metals (as provided for in Annex II of the Convention) and which have been (or will be) authorised, i.e. appointed by State or a State representative body e.g. Parliament, Government, Minister, etc. on the basis of Art. 5 (1) of the Convention, and notified to all Contracting States by the Depositary.

4. The main sources on which these Guidelines are based are:

   - The Convention on the Control and Marking of Articles of Precious Metals
   - ISO 17025 "General requirements for the competence of testing and calibration laboratories"
   - ISO 17020 "General Criteria for the operation of various types of bodies performing inspection"
   - EA IAF/ILAC Guidance on the Application of ISO/IEC 17020

5. In particular relevant for the Guidelines is the type of inspection body (i.e. type A, B or C) as defined in ISO 17020 "General Criteria for the operation of various types of bodies performing inspection". Contracting States have all agreed that authorised Assay Offices should comply with the requirements of a Type A of inspection body, as defined in ISO 17020 (see box on next page).

A.1 The inspection body shall be independent of the parties involved.
The inspection body and its staff responsible for carrying out the inspection shall not be the designer, manufacturer, supplier, installer, purchaser, owner, user or maintainer of the items which they inspect, nor the authorised representative of any of these parties.

A.2 The inspection body and its staff shall not engage in any activities that may conflict with their independence of judgement and integrity in relation to their inspection activities. In particular, they shall not become directly involved in the design, manufacture, supply, installation, use or maintenance of the items inspected, or similar competitive items.

A.3 All interested parties shall have access to the services of the inspection body. There shall not be undue financial or other conditions. The procedures under which the body operates shall be administered in a non-discriminatory manner.

6. Assay Offices of Type B and C (see box below) of an Acceding State will have to be duly assessed by the Inspection Team before being accepted as "authorised Assay Office" under the Convention.

ISO definitions of Type B and C Inspection Bodies (as per ISO 17020)

Type B inspection body: The inspection body which forms a separate and identifiable part of an organisation involved in the design, manufacture, supply, installation, use or maintenance of the items it inspects and has been established to supply inspection services to its parent organization. Type B inspection bodies must meet the criteria set at annex B of ISO 17020.

Type C inspection body: The inspection body which is involved in the design, manufacture, supply, installation, use or maintenance of the items it inspects or of similar competitive items and may supply inspection services to other parties not being its parent organisation. Type C inspection bodies must shall meet the criteria of annex C of ISO 17020.

7. The present Guidelines look at the various aspects covering the independence of Assay Offices starting with the independence of management and staff, good governance, quality management, etc. All these aspects, taken together, are essential to the independence of authorised Assay Offices as well as their reputation.

<u>Independence (of management & staff)</u>

8. The AO (or its staff) should neither be manufacturing, selling or supplying precious metals articles nor be engaged in any activities that may conflict with its independence of judgement and integrity. For example, the AO (or its staff) should not sell precious metals articles.

9. The AO should have documented procedures to ensure that the AO staff members are free from commercial, financial or other pressures which might affect their judgement. For more details, see "Personnel" below.

10. If the AO is linked to a party directly involved in precious metals business by (i) common ownership, (ii) common ownership appointees on the board, (iii) directly reporting to the management of another party, (iv) contractual or informal arrangements, neither the owner nor any stakeholder should have the ability to influence assaying & marking activities. In addition, the AO and the organisation directly involved in precious metals business, to which the AO belongs, should have separate legal identities. If this is not the case, the Chief Executive of the legal entity of which the AO is a part should define and document a policy in order to maintain the AO independent.

11. There should not be any undue financial or other conditions to access to the AO's services. All (registered) precious metals operators should have access to the services of the AO. Fees or subsidies are not considered as "undue" but may influence AO activities. In the latter case, fees or subsidies should not improperly influence AO activities.

Management / Good governance

12. The AO should operate independently and not outsource its activities due to a lack of resources or equipment with the exception of chemical testing subcontracting in line with paragraph 1.3 of Annex II to the Convention. It should thus have the necessary resources and equipment to enable it to carry out its obligations effectively and efficiently. An AO, which is not delivering, may have its independence questioned by the State or precious metals operators. A good indicator to measure the efficiency of an AO is the time required to have articles assayed and marked. The average delivery time in the Convention – under normal circumstances – is between 2 and 3 days. A reasonable time limit is a working week.

13. The management should be competent to run the AO: it should be familiar with precious metals control and have the appropriate management skills. If the AO is part of another organisation, the Assay Master and/or Head of Laboratory should normally report directly to the CEO. If this is not the case, then they should not report to someone who may be, directly or indirectly, involved in precious metals business.

14. The AO should have its own budget and be able to manage it as it wishes. If the AO is part of another organisation, then the AO should have no difficulties in getting the necessary financial authorisation to e.g. replace critical equipment, which has broken down. See also under "Equipment".

Personnel

15. The AO should have sufficient qualified staff available.

16. Staff should be technically competent, have the necessary education and receive the necessary training. Records of staff training should be maintained.

17. Staff's professional integrity should be ensured; there should be clearly defined rules on ethics, confidentiality, conflict of interest and improper influence. Employees should be required to declare their compliance with rules on conflict of interest and be bound by professional secrecy.

Premises & Equipment

18. The AO should have the necessary means and equipment available (for the link between the independence of AO and equipment, see paragraph 12 above). The equipment should be sufficient and adequate. The equipment should be working, i.e. it should be operational, correctly maintained and – when relevant / necessary – calibrated.

19. Environmental conditions, in and around the AO, should not influence assaying results of precious metals articles. If they do, the necessary precautions or remedies should be taken in order that the reputation of the AO is not tarnished and its independence put into question.

20. Procedures should be in place to ensure that equipment, which is not working well or not at all, is replaced or repaired within reasonable time. There should be a recovery or contingency plan for critical equipment. If the AO is part of another organisation, the latter should not be able to postpone or reject the request to repair or replace critical equipment.

Quality Management / System, Working Procedures & Records

21. The AO should be able to prove conformance to relevant ISO standards and follow them. This is the best way to ensure its independence as well as its professional reputation. As a result, the AO may wish to be accredited to relevant ISO standards (NB: the issue of whether accreditation should be a requirement under the Convention is currently under discussion; for the time being, accreditation is not required).

22. The AO's quality system should ideally be based on a recognised international standard. The quality system should be implemented and followed. There should be a documentation system in place and the quality system should be reviewed and audited. Complaints of precious metals operators or consumers should be recorded and duly investigated. The necessary corrective action should be taken and the outcome of the investigation communicated back. There should be documented instructions or procedures on the use and operation of equipment. Records should be maintained / archived.

Security

23. Security is essential to the independence of AO and the reputation of the Convention's Common Control Mark (CCM), which stands for the independent, third-party control

of precious metals articles in line with the Convention's requirements. Security is particularly critical when the AO is off-site marking.

24. There should be instructions (i) for the manufacturing and secure custody of the tools for producing the CCM; (ii) for the safe storage of CCM punches in use; and (iii) for the safe storage of CCM punches not in use. CCM punches should be subject to constant monitoring in the premises.

## 2.7 GUIDELINES FOR THE ASSESSMENT REQUIREMENTS OF A TESTING LABORATORY

1.1 Management Organisation

The laboratory shall be competent to perform the tests concerned.

1.2 Personnel

The test laboratory shall have sufficient personnel with the necessary education, training and technical knowledge. Records of the training should be maintained.

1.3 Premises and equipment

1.3.1 The test laboratory shall have all the correct equipment to perform the tests.

1.3.2 The environment in which the tests are performed shall not invalidate the test results. Good housekeeping shall apply throughout the testing laboratory.

1.3.3 Equipment

All equipment shall be correctly maintained and calibrated.

1.3.4 Calibration of measuring equipment

Calibration procedure shall be carried out at intervals established by stability and usage.

Calibration records shall be retained for 3 years.

1.4 Working procedures

Test methods. The testing laboratory shall have documented instructions on the use and operation of equipment. The testing laboratory shall use documented methods and procedures. There should be a documented system for calculating, checking and reporting results.

1.5 Records

The testing laboratory shall maintain records of tests and calibration for a period of 3 years.

1.6 Handling of samples

The laboratory shall have a system to ensure no confusion regarding the identity of samples.

1.7 Confidentiality and security

Personnel of the testing laboratory to observe professional secrecy.

1.8 Co-operation with other laboratories to take part in exchange of samples. The objectives being to have uniform test procedures and to improve the quality of testing.

## 2.8 LIST OF ESSENTIAL ANALYTICAL AND MARKING EQUIPMENT

### 1) Analytical Equipment

Note: for the material, see the relevant ISO standard!

**Silver Analysis** (normative reference: ISO 11427/13756)

**Gold Analysis** by cupellation (normative reference: ISO 11426)

**Platinum & Palladium Analysis** (normative reference: ISO 11494 & ISO 11495)

### 2) Marking Equipment

- Fly press
- Hand operated press
- Pneumatic powered bench press (with foot pedal)
- Support bed for presses
- Support stakes (usually highly polished)
- Hammer (size depending on articles: recommended 0.5 kg and 1 kg)
- Hallmark punches (hand and press punches)
- 10x magnifying glass
- Secure / safe storage solution
- Recommended: Laser marking machine

* * * * * * *

# Section 3: Standing Committee

## 3.1 RULES OF PROCEDURE OF THE STANDING COMMITTEE[6]

### General

1. These Rules of Procedure shall apply to the meetings of the Standing Committee provided for in Article 10 of the Convention, hereinafter referred to as "the Committee".

2. The Committee shall be composed of representatives of the Contracting States. The representatives shall be chosen from officials of the national administrations and of Assay Offices authorised in the sense of Article 5 of the Convention.

3. A Secretariat shall be appointed to deal with the services and meeting facilities for the Committee and sub-committees.

4. The Contracting States shall notify the Secretariat of the competent authorities to whom all communications shall be sent and also of the names of their representatives.

### Chairmanship

5. The conduct of business shall be in the hands of the Chairperson, who shall be assisted in his/her task by two Deputies (First Deputy, Second Deputy).

6. The Chairperson shall be elected by the Committee and shall exercise his/her functions for a renewable term of two calendar years (starting on 1st January).

7. The Committee shall also elect two Deputy Chairpersons to normally serve for a similar period, one of whom shall assume the functions of the Chairperson in his/her absence.

8. In the event of a vacancy in the chairmanship, Members of the Standing Committee shall be informally consulted on whom they consider the most competent or suitable to serve as the next Second Deputy Chairperson.

9. Once a candidate or several candidates have been found, the Standing Committee will elect the new Second Deputy Chairman: either by acclamation if there is only one candidate; or by secret ballot by absolute majority voting if there are several candidates (one vote by Contracting State).

10. The First Deputy Chairperson shall normally be elected Chairperson. The Second Deputy Chairperson shall normally be elected First Deputy Chairperson. Both shall be elected by acclamation, unless a secret ballot (by majority voting[7]) has been requested. The above procedure is also applicable in the event of a re-election.

---

6 Adopted in 1975 at the 1st meeting of the Standing Committee and subsequently revised.

7 In line with paragraph 23 of the Rules of Procedure (four-fifth majority voting)

## Meetings

11. Subject to paragraph 12 the Committee shall, in consultation with the Secretariat, decide the dates of its meetings.

12. The Chairman shall convene a meeting:

    (a) if during the course of any period of twelve months a meeting would not otherwise have been held;

    (b) upon the request in writing of any Contracting State to the Secretariat stating the subject matter to be considered;

    (c) where he/she deems it advisable for the effective functioning of the Convention;

    (d) upon receipt by the Chairman of a notification referred to in paragraph 1 of Article 9 of the Convention;

    (e) to be held within one month of receipt by the Contracting States of a notification referred to in paragraph 4 of Article 9 of the Convention.

13. The meetings shall be held in Geneva unless otherwise agreed by the Committee.

14. The Secretariat shall notify the competent authorities of Contracting and Applicant States of all meetings convened in accordance with these rules.

15. Representatives of Contracting and Applicant States shall regularly attend meetings unless other arrangements have been made (e.g. an Assay Office or a Surveillance Authority may represent a Ministry and vice-versa).

16. Representatives of non-Contracting States, others than Applicants, can attend meetings of the Standing Committee in line with the Guidelines on Non-Members (see Section 3.4).

## Agenda

17. The Secretariat shall in conjunction with the Chairmanship establish a provisional Agenda for each meeting and shall communicate it to the competent authorities of the Contracting States at least fourteen days before the meeting.

18. A final Agenda shall be adopted by the Committee at the beginning of each meeting.

## Voting procedures

19. In accordance with Article 10 of the Convention, Committee decisions consist of (i) recommendations or proposals to the Contracting States regarding the amendment of

the Convention or its Annexes and (ii) decisions on technical and other matters. The following rules apply:

20. Each Contracting State has one vote.

21. Voting shall be by hand and take place during Committee meetings. For votes in-between meetings, see paragraph 25.

22. Committee decisions are made by unanimous vote with the exception of those listed at paragraph 23. Abstentions from voting will not prevent decisions from being unanimous.

23. If no consensus can be reached, Committee decisions are made by four-fifths majority voting in the following matters, provided that at least four-fifths of all Contracting States are represented at a meeting:

    (a) Disputes between States / Recommendation by the Standing Committee (Art 9 (2) and Art 10 (2), 5th indent, Convention);

    (b) Interpretation of Convention's provisions (Art 10 (2), 3rd indent, Convention);

    (c) Appointment of Secretariat (Paragraph 3, Rules of Procedure);

    (d) Election of Chairman and Deputy (Paragraphs 6 & 7, Rules of Procedure);

    (e) Date of meeting (Paragraph 11, Rules of Procedure);

    (f) Place of meeting (Paragraph 13, Rules of Procedure);

    (g) Non-payment of fees / Measures to be taken (Paragraph 1, letter g of Financial Regulations);

    (h) Amendment of the Compilation of Acts with the exception of paragraph 23.

24. Committee decisions by majority voting shall be taken by hand unless (i) a secret ballot is requested by one Delegation; (ii) there are several candidates to an election. Abstentions, blank or invalid votes (e.g. spoiled, null or void) shall not be considered as votes cast.

25. Committee decisions (whether by majority or unanimous voting) may also be taken in-between meetings by written procedure. The procedure, which is initiated by the Secretariat, is done entirely in writing. The timeframe shall normally be one month unless a longer timeframe (not exceeding 3 months) is required by a Contracting State. A Contracting State may object to the written procedure and request that the matter is discussed and submitted to voting at the next meeting.

26. Applicant States and other non-Contracting States are consulted on Committee decisions, which are of particular interest to them (e.g. on Round Robin).

<u>Amendment to the Convention and Annexes</u>

27. In line with Article 10.5 of the Convention, the Secretariat shall transmit all recommendations of the Committee relating to either the implementation of the

Convention or proposals for the amendment of the Convention to the Depositary which shall notify the Contracting States.

Decisions on Technical Matter

28. In line with Article 10.2(3) of the Convention, the Committee may adopt decisions on technical matter as provided for in the Annexes. Such a decision can be presented either orally at a meeting of the Standing Committee and confirmed in writing subsequently, or sent in writing to the Secretariat by a Contracting State. The Secretariat distributes the paper to all Contracting States and the Contracting States vote or give their opinion as soon as possible but at least within six weeks. The Secretariat and the initiating Contracting State prepare the conclusion of the result and, if necessary, send out a new proposal for voting. If needed, the initiating Contracting State may constitute a small working group to prepare the matter for decision. If a positive decision is taken, the Secretariat circulate the new decision which enters into force at the date of that paper and the assay office may start immediately to mark the article concerned with the CCM. The decision is confirmed at the next Standing Committee meeting with a note in the Summary Records. Where necessary, a Contracting State may request to see the article of precious metal concerned before confirming the decision.

29. The vote may be carried out by post, fax or e-mail.

30. The Secretariat shall incorporate decisions on technical matter in a compilation in accordance with paragraph 31 below.

**Compilation of Acts of the Committee and Decisions on Technical Matter**

31. All decisions on technical matters adopted under Article 10.2(3) and all other acts adopted by the Committee relating to the securing of uniform interpretation and application of the provisions of the Convention (Article 10.2(5)) may be incorporated into a compilation.

**Sub-committees**

32. The Committee may set up any sub-committee as may be required. Each sub-committee shall report to the Committee which shall remain responsible for all actions required under the Convention.

33. Sub-Committees may be open to the participation of Applicant States and other non-Contracting States.

**Records of meetings**

34. The Secretariat shall prepare a summary record of the proceedings of each meeting. This record shall be circulated to the competent authorities and the representatives of all Contracting and Applicant States.

## 3.2 EXPLANATORY NOTES TO THE ORIGINAL CONVENTION OF 15.11.1972 (as amended in 1988 and 2001)

1. These explanatory notes express the views of representatives of the States who have been engaged in drawing up and amending the text of the Convention. The notes are an attempt to make clear the intentions of the text of the Convention and they should therefore be helpful as a guide to its interpretation.

2. The explanatory notes were originally issued at the end of the negotiations for the Convention. They were subsequently amended by the Standing Committee at its 69th meeting in Tel Aviv on 11 October 2010 (following the entry into force of the 2001 Amendment on 27 February 2010) and at its 74th meeting in Geneva on 27 March 2014. The Notes also reflect legal opinions (e.g. by the Depositary), which have been endorsed by the Standing Committee.

### EXPLANATORY NOTES

#### Title and scope of the Convention

3. The purpose of this Convention is to facilitate trade in articles of precious metals between the Contracting States by obliging the importing State to accept control and marking performed in another Contracting State in accordance with the provisions of the Convention. It should be noted however that the Convention does not prevent traders from following the procedure adopted in national law for exports and imports of articles of precious metals in general.

4. While the primary goal of the Convention is the facilitation of international trade in precious metals, measures to facilitate trade must be taken in such a way that they do not affect (i.e. reduce) consumer protection (Legal Opinion PMC/W 2/2009).

5. The Convention's original preamble consisted only of one paragraph but was then completed with 3 other paragraphs in 2001 in order to emphasize that compulsory hallmarking is not required from the Contracting States and that marking with the Common Control Mark (CCM) is carried out on a voluntary basis.

6. The Convention is divided into four parts: the first part deals with the scope and operation of the Convention and the second with the controls and sanctions which it imposes, the third with the Standing Committee and amendments to the Convention; the fourth part contains final provisions in respect of entry into force, accession and withdrawal. There are also two Annexes, dealing with definitions and technical requirements and control by the authorised assay offices.

Article 1 - paragraphs 1 and 2

7. These paragraphs contain the basic provisions of the Convention. The principle adopted is that those categories of articles of precious metals which fall within the definitions and the conditions set out in Annex 1 shall, provided they are marked by an authorised assay office in accordance with the requirements of Annex II, not be subject to any further assay or marking upon importation from one Contracting State to another. Assay or marking mentioned here is intended to refer not only to assay and marking in connection with assay office procedure but also to national requirements where marking is only required to indicate the responsible precious metal operator, the nature of the metal or the standard of fineness of the articles without any assay mark being required, these marks being normally put on by the responsible precious metal operator of such articles. The responsible precious metal operator is the maker or other person (e.g. importer) accepting responsibility for the articles.

8. Originally, the Convention applied only to articles imported from the territory of another Contracting State regardless of their origin. With the 2001 Amendment, paragraphs 1 and 2 were rewritten and the reference to *"articles of precious metals imported from the territory of another Contracting State"* was deleted. This means that Contracting States must accept CCM articles regardless of their origin (i.e. where they have been made and from where they are imported).

Article 1 - paragraph 3

9. Many Contracting States prohibit the import or sale of articles of precious metals which either do not fulfil certain national standards of fineness or are not considered as precious metals. These standards as well as the definitions of precious metals articles differ in the various Contracting States. It is specifically provided in this paragraph that a Contracting State may continue to prohibit the entry of articles, which do not comply with its national standards of fineness, even though the articles are of a standard which is listed in Annex I to this Convention. The same applies for articles which would not be considered precious metals articles in the importing country.

Article 3

10. Articles of precious metals which can be traded freely under the terms of this Convention shall be marked with the minimum marks, as listed in Annex II (currently, they include: a responsibility mark, a mark indicating the fineness of the metal, an assay office mark and the CCM). In every case the articles must be submitted to an authorised assay office which on receipt is obliged to make such assays as to satisfy itself that the articles are of the correct fineness and comply also with the other provisions of Annex I. Only then may the assay office put its recognized assay office mark and the CCM on the articles.

11. Whether the responsibility mark and the mark indicating the fineness of metal is affixed by the responsible precious metal operator (e.g. manufacturer, importer) before the articles are presented to the assay office or whether those marks are added by the assay office when the articles have been checked remains a matter of national legislation.

Article 4

12. Where an article after having been marked by an assay office has been altered in any way it will cease to benefit from the provisions of Article 1. However, the authorities of the importing country are free to admit the article without further assaying or marking.

Article 5

13. In order that the assay offices taking part in the scheme shall be known to each other and to the Contracting States the appointment of each assay office and its withdrawal must be notified to the depositary. At the same time the form of their assay office marks shall also be notified in order that steps can be taken for their protection in the other Contracting States to the Convention. Article 5 was substantially modified by the 2001 Amendment. The main changes are the following:

- A new paragraph 2 was added in order to define the requirements which authorised Assay Offices need to fulfil. Particular emphasis has been put on ensuring the independence of Assay Offices, in particular their staff, in line with the principle of "independent, third-party control" on which the Convention is based. Paragraph 2 is one of the core additions introduced by the 2001 Amendment.
- The reference to "territory" has been deleted in paragraph 1. Originally, the Convention stipulated that the Assay Offices were *"the only bodies authorized in its territory to carry out the control of articles of precious metals provided for in this Convention"*. As a result, an authorised Assay Office of a Contracting State can now use the assaying services of an authorised Assay Office of another Contracting State; and a Contracting State can either delegate some assaying competences to an authorised Assay Office of another Contracting State for a defined period of time. The fact that the reference to "territory" has been deleted does, however, not mean that authorised Assay Offices can CCM-mark articles outside their territorial boundaries (so-called "off-shore marking"). According to the Depositary (see Legal Opinion in PMC/W 6/2006), such a practice would first require a formal resolution by the Standing Committee.

Article 6

14. As an exception to the general rule of paragraph 2 of Article 1, this Article provides that check tests may be carried out on articles of precious metals although such articles bear the marks provided for by this Convention. The purpose of this exception is to enable the competent authorities of the importing countries to make tests to verify whether the Convention is being complied with. In any event, these tests are not to hamper unduly trade in such articles. This Article would, therefore, not allow all imported articles of precious metals or even a large part of imported articles under this Convention to be tested as a matter of routine by the authority of the importing country. Moreover, while Contracting States may implement market surveillance measures in addition to spot

checks, there is nothing in the text of the Convention which indicates that market surveillance measures constitute an obligation for Contracting States (Legal Opinion PMC/W 2/2009).

Article 7

15. It is important that the CCM should have the maximum protection against forgery or misuse both inside the Contracting States and in third countries. A means of protection is given by Article 6ter of the Paris Convention, to which all the present Contracting States subscribe in its Act of London of 1934. This provides that on registration with WIPO all the countries of the Paris Union agree to refuse or to invalidate national registration by others and to prohibit the unauthorised use of the CCM.

Article 8

16. This Article provides for protection to be given in all the Contracting States against forgery, unauthorised alteration and misuse of the CCM and the marks of the authorised assay offices, and against alteration of the other marks. Normally proceedings shall be instituted under criminal law in all cases where offences have been committed in order that the marks may be properly protected. This constitutes a positive obligation for Contracting States, which are expected to gather evidence on the possible forgery etc. of the CCM and other (hall)marks (Legal Opinion PMC/W 2/2009). In certain cases of a minor nature other action may be taken where this would be more appropriate.

17, The fineness mark and responsibility mark will be marks which should be protected under national law. The only specific provision on this subject included in the Convention is the requirement that Contracting States shall have legislation prohibiting any alteration or obliteration of these marks after the CCM has been applied.

Article 9

18. This Article introduces a procedure for entering into immediate consultation with the authorised assay office in respect of which there is reason to believe that some irregularity has taken place. The latter office is under the obligation to promptly lend all reasonable assistance for the investigation of the case.

19. The purpose of this procedure is to eliminate preferably through direct consultations between the assay offices concerned any misunderstandings that may arise in the day-to-day operation of the Convention.

20. The additional surveillance in paragraph 3 of this Article is intended to take the form of special control by Customs offices or by other authorities.

21. There may be exceptional cases where the importing Contracting State may be confronted with substantial imports of articles which have been assayed by a particular assay office in relation to which there is evidence of repeated misapplication of the CCM of a serious nature. In such an exceptional case, the importing Contracting State may take immediate action unilaterally and may temporarily refuse to accept articles

bearing the assay office marks concerned. It is expressly provided, however, that all other Contracting States should be notified immediately and the Standing Committee must meet within one month to consider the matter.

Article 10

22. In order to ensure that the Convention operates smoothly a Standing Committee is established which shall meet whenever necessary and should in any case meet at least once a year. This Committee will be composed of representatives of the Contracting States and each State may be represented by one or more persons who may be either governmental officials or experts. Each delegation will have one vote. The purpose of the Standing Committee is to deal with difficulties that may arise in connection with the operation of the Convention and to consider ways in which its machinery may be improved. The Standing Committee may make recommendations for the better functioning of the Convention and also proposals for the amendment of the Articles of the Convention and its Annexes. The Committee shall also have the duty to consider measures for the protection of the marks against forgery and misuse. The 2001 Amendment considerably enlarges the powers of the Standing Committee and enables the latter to take decisions on technical matters, as provided for in the Annexes, by unanimous vote. Paragraph 2, third indent, of Article 10 is one of the core additions introduced by the 2001 Amendment.

Article 11

23. The 2001 Amendment clarifies the procedure for the adoption of amendments, either to the Convention or to the Annexes.

24. Regarding the Convention, formal acceptance is required by all Contracting States in the case of proposals received from the Standing Committee to amend Articles of the Convention, or in the case of proposals for amendment of the Convention received from a Contracting State. A Contracting State may, however, request that negotiations take place on the proposal provided that such a request is lodged within a period of three months from the date of the submission of the proposal in question. In such a case the depositary would have to arrange for such negotiations to be held.

25. Regarding the Annexes, a simplified procedure for the amendment of the Annexes, if proposed by the Standing Committee, has been incorporated which seeks to avoid the procedure of ratification. The amendment will subsequently automatically come into force after a fixed period, normally of six months or longer if so provided for in the amendment, unless a negative reply indicating dissent has been received from the Government of any Contracting State no later than 3 months after the date of notification by the depositary.

Article 14

26. A Contracting State wishing to withdraw from the Convention shall give the usual formal notice of twelve months, but it is also possible for all the Contracting States to agree to the withdrawal of a party on other terms.

27. A Contracting State, which withdraws from the Convention, should after withdrawal no longer be free to continue to use the CCM for any purpose. An undertaking to this effect is therefore included in this Article. After its withdrawal the remaining Contracting States are no longer under any obligation to accept articles which have been marked by an authorised assay office of that Contracting State during the period of its membership of the Convention.

## Convention's Annexes [8]

### Annex I

28. This Annex sets out the technical conditions that must be satisfied before an article of precious metal is entitled to the benefits of the provisions of the Convention. The conditions set out are minimum conditions which must be complied with by each such article in any exporting Contracting State before the article may be marked under the Convention.

29. The Convention applies to all complete articles of precious metals of at least the minimum standard of fineness but excludes parts, semi-manufactures and industrial raw materials, the marking of which might lead to deception. Certain articles such as medical or scientific apparatus, samples, antiques or articles too small to be marked, are generally exempted from the assaying and marking regulations of the Contracting States. These exemptions are broadly the same in the participating countries, but they do not correspond exactly. It would be a substantial task to try to harmonize national legislation in this respect. However, in cases where articles normally exempted require marking by an importing country there is nothing to prevent the assay office of the exporting country from controlling and marking them.

30. The standards of fineness contained in the Convention are those standards which are currently in force in many countries.

31. Only these standards are recognized by the Convention, so that a fineness of say 595 for gold would be regarded as being of a standard of fineness of 585.

32. The principle relating to solder is that the solder shall be of the same fineness as the article itself. However, some relaxation is permitted for practical reasons and where such solder is below the standard of fineness of the article, only the minimum quantities required for the purpose are to be used.

33. Where an article consists of more than one precious metal, only one metal may bear the marks set out in Annex II. In order to avoid deception, the metal which is so marked shall be the one which is generally regarded as the least precious.

---

[8] Annexes I and II were substantially revised in 1998 (with entry into force in 2000), 2010 (with entry into force in 2011) and 2018 (with entry into force in 2019).

34. The Contracting State concerned or its assay offices must keep an official register of responsibility marks, but the conditions of registration, including the entitlement of persons to be entered in the register, is an internal matter for the State concerned.

35. Where the provisions of the Convention are found to be complied with, the assay offices will normally stamp their marks on the articles concerned.

36. Off-site marking has been permitted under the Convention since 1984. Contracting States are responsible for the implementation by authorised Assay Offices of off-site marking requirements, which must be in line with existing guidelines by the Standing Committee, in particular the secure custody of punches.

## 3.3 GUIDELINES ON THE SHARING OF INFORMATION, CONFIDENTIALITY AND CONFLICT OF INTEREST

### Sharing of Information

1. This Chapter applies to all information shared under the Convention, whether classified (e.g. restricted) or non-classified in line with the Standing Committee's classification policy[9].

2. With the exception of explicit obligations deriving from the Convention (e.g. Article 9), the sharing of information under the Convention is voluntary. Each National Administration / Assay Office remains competent on how to use the shared information.

3. The aim of sharing information is to facilitate application of the Convention, in particular (i) the control and marking of precious metals articles with the CCM; (ii) the harmonisation and interpretation of standards and requirements. It gives National Administrations and Assay Offices the possibility to share in confidence any information on other matters such as falsified (hall)marks, information on customers; internet trade and market surveillance, non-complying articles, etc. Duplication with other existing bodies or channels should be avoided, in particular for matters unrelated to CCM articles and/or the Convention.

### Confidentiality & Absence of Conflict of Interest

4. National Administrations and Assay Offices undertake to respect the classification of documents and information, as defined by the SC. They also undertake to avoid any potential or real conflict of interests with activities and issues under discussion in the Convention. The undertaking applies to the respective authorities as well as to their representatives.

5. National administrations are responsible that rules regarding confidentiality and the absence of conflict of interest are effectively applied by Assay Offices and that the latter are not under the "improper" influence of any other party, in particular trade.

6. Sensitive information shall be circulated with the word "restricted" [10] (or equivalent) and shall not be shared with non-Members of the Convention, in particular trade. The disclosing of information, including "restricted" documents, is, however, subject to national law (e.g. Freedom of Information Act).

7. Observers and Guests attending SC meetings shall be required to sign an annual declaration (see Annex 2) on (i) the confidentiality of information received during and in-between meetings; and (ii) any potential or real conflict of interests with activities and issues under discussion in the Convention.

---

9 See PMC/W 6/2012

10 Is considered "restricted", information which is sensitive (test or assessment results, etc.) and whose circulation should be limited to those it is intended to. To be considered restricted, documents or communications must be circulated with the word "restricted".

## 3.4 GUIDELINES ON THE REPRESENTATION OF NON-MEMBERS

1. The present Guidelines have been issued with the aim of facilitating the creation of an international forum, as part of SC meetings, comprising Members and Non-Members for the exchange of information and promotion of technical co-operation between Ministries, authorised State Assay Offices and industry stakeholders.

2. Participation will not be dependent on Convention membership nor will it be conditional to assentation of membership.

3. In order to do this, the SC encourages Non-Members to participate in the work of the SC. This will allow:

   a) To develop mutual confidence and facilitate the exchange of information between Assay Offices and National Administrations;

   b) To ensure the equivalence of test results between Assay Offices through the participation in Round Robin (RR);

   c) To keep abreast on technical and technological developments in the field of precious metal control;

   d) To promote the international harmonisation of precious metal control and marking practices taking into account the Convention's established standards;

   e) To identify, and discuss, technical or administrative barriers to trade or problems in the field of precious metal control;

   f) To co-operate with a view of promoting worldwide the long-established practice and the system of (voluntary or compulsory) control of precious metal articles; and

   g) To work with a view of establishing a common position on issues of mutual interest discussed in other fora (e.g. EU or ISO standards).

4. A Non-Member is either a State or an organisation, as defined below:

   - State = UN Member State, which is not party to the Convention;

   - Organisation = national or international non-for-profit organisation in the field of standards, consumer protection or trade related to the field of precious metals.

   For other terms used in these Guidelines, see Glossary at Section 2.4.

5. Non-Members can attend SC meetings as:

| | |
|---|---|
| Technical Programme Participant | An Assay Office (see glossary), which aims at regularly participating in SC meetings and RR |
| Observer | A State (represented by a Ministry and an Assay Office), an Assay Office, a national or international organisation (as defined above), which intends to regularly attend SC meetings. |
| Guest | A Ministry, an Assay Office, a national or international organisation (as defined above), which desires to occasionally attend SC meetings. |

6. The status implies rights and obligations, which are detailed in these Guidelines.

7. The status of "Technical Programme Participant" and "Observer" is granted to Non-Members by the SC upon application (for the form, see 3.5); it can be suspended or terminated by the SC, notably if the Non-Member does not fulfil its obligations.

8. The status of guest is granted by the SC Chairman.

9. Invitations to SC meetings are sent by the Secretariat to Non-Members, including all (former) IAAO Members.

10. The representation of a Non-Member State can be at a dual level: National Administration and the Assay Office(s).

11. SC meetings take usually place twice a year: one meeting is normally for one day focusing partly on matters relating to the operation of the Convention and partly on technical matters in relation testing and marking ; the other meeting is normally for 1.5 days and will focus partly on matters relating to the operation of the Convention but also on technical issues as well as on updates and presentations on technical and technological developments in the field of precious metal control.

12. Non-Members have the following rights:

- To participate in:
    - SC meetings and discussions unless they are confidential[11];
    - Sub-Committees and Working Groups unless they are purely Convention-related; and
    - RR.

[11] Confidential issues will be regrouped at either the beginning or the end of the meeting's Agenda.

- To be consulted on:

    - Technical issues (e.g. on RR) with the exception of Technical Decisions and the Convention's Annexes;

    - Regulatory issues if the regulations of the Non-Member are based on those of the Convention.

- To receive:

    - SC and sub-committee meeting documents unless they are confidential or strictly reserved for Members, subject to the signing of a declaration of confidentiality;

    - RR reports, if it has participated in the RR.

13. Non-Members have the following obligations:

    - to pay fees in line with their status, as defined in the Financial Regulations;

    - to comply with the SC's Guidelines on the Sharing of Information, Confidentiality and Conflict of Interest and sign a declaration of confidentiality, as contained in the Compilation of Acts.

14. Non-Members have the possibility to sign a "Memorandum of Understanding" (MoU) detailing rights and obligations. The MoU will establish a basis for the co-operation with Non-Members and facilitate the payment of fees. For the template, see at Annex 3.

## 3.5 APPLICATION FORM FOR NON-MEMBERS

*Return Application form electronically to:*

Secretariat of the Precious Metals Convention
c/o PIC/S
Rue de Saint-Jean 26
CH-1203 Geneva
E-mail: info@hallmarkingconvention.org

| | |
|---|---|
| **Application to become** *(indicate with a cross which is applicable)*<br><br>[…] Technical Programme Participant (TPP)<br>[…] Observer (OBS) | |
| 1. | **Authority / Organisation which applies** *(indicate the name)* |
| 1.1 | Official address |
| 1.2 | Official phone |
| 1.3 | Office e-mail |
| 1.4 | Official web site |
| 1.5 | Contact person *(name)* |
| 1.5.1 | Position |
| 1.5.2 | Phone |
| 1.5.3 | E-mail |

| | |
|---|---|
| 2. | **General** |
| 2.1 | Is there a control of precious metal articles in your country? |
| 2.2 | Is the control voluntary or compulsory? *(describe briefly)* |
| 2.3 | Supply the hyperlink to your national legislation on precious metal control and, if available, an English translation. |
| 2.4 | Which ministry is responsible for precious metal control? |

| | |
|---|---|
| 3. | **Organisation** |
| 3.1 | List of Assay Office(s) – including sub-offices and branches |

| | |
|---|---|
| 3.2 | Laboratory |
| 3.2.1 | Is your laboratory accredited? Please state the standards (e.g. ISO 17025). |
| 3.2.2 | If so, please indicate for which methods of analysis (scope). |
| 3.2.3 | Does your laboratory participate in interlaboratory testing? *(state which ones)* |

| | |
|---|---|
| 4. | **Legislation** |
| 4.1 | Which metals are considered as precious metals under your legislation? |
| 4.2 | Which standards of fineness are recognised in your legislation? |
| 4.2.1 | For platinum |
| 4.2.2 | For gold |
| 4.2.3 | For palladium |
| 4.2.4 | For silver |
| 4.3 | Are there weight exemptions for precious metal articles? |
| 4.3.1 | For platinum |
| 4.3.2 | For gold |
| 4.3.3 | For palladium |
| 4.3.4 | For silver |

| | |
|---|---|
| 5. | **Control marks** |
| 5.1 | Please attach a copy of all the control marks used by the Assay Office(s) in your country. |
| 5.2 | Do you recognise the CCM? |
| 5.3 | Do you recognise foreign hallmarks (based on a bilateral or multilateral convention) and if so, which ones? |

| | |
|---|---|
| **6.** | **Date & Signature** |

# Section 4: Standing Technical Group

## 4.1 TERMS OF REFERENCE

### MANDATE

1. The Standing Technical Group (STG) is established by the Standing Committee which can – at its own discretion – terminate the STG.

2. It shall assist and advise the Standing Committee on technical questions related to the control and marking of articles of precious metals.

3. While assisting and advising the Standing Committee in setting or revising technical requirements (as defined in the Convention's Annexes and their Schedules), the STG shall take into account the particular needs of assay offices, industry and consumers and the Convention's main goal to harmonise the control and marking of articles of precious metals."

4. The STG shall also be responsible for organising and monitoring, on behalf of the Standing Committee, Round Robins

### MEMBERSHIP

STG Members

5. The members of the STG shall be technical experts in the field of precious metal control, who are employed by an authorised Assay Office.

6. The STG shall comprise at least three Members from three different Contracting States and not more than seven Members.

7. Members are nominated by the Standing Committee for a renewable term of 2 years.

Corresponding Members

8. The STG may invite other representatives from the Standing Committee, who have shown an interest, as well as technical experts outside the Standing Committee when the STG feels it is necessary to receive assistance on a specific subject. These representatives are referred to as "Corresponding Members". They may be invited to STG meetings or consulted at distance. A shortlist of Corresponding Members is kept up-to-date by the Secretariat.

## ORGANISATION

9. The STG shall normally meet at least once a year.

10. Members shall elect a Chairperson, who shall serve for a period of normally 2 years. The Chairperson of the STG shall not be the Chairperson of the Standing Committee.

11. The Chairperson shall be responsible for

    a) Calling meetings,
    b) Issuing agendas,
    c) Chairing discussions,
    d) Clearing summary records of meetings in time for the next Standing Committee meeting.

12. The Chairperson shall also report to the Standing Committee at each meeting.

13. The Chairperson may call on the Secretariat of the Standing Committee to provide secretariat services to the STG.

14. Members shall elect a Deputy Chairperson, who shall serve for a period of normally 2 years. The Deputy Chairperson of the STG shall take over the responsibilities, mentioned at paragraph 11 above, in the absence of the Chairperson.

## SCOPE

15. The scope of the STG is to:

    a) Address technical issues relevant to the Convention which have been submitted to it by the Standing Committee;

    b) Review specific technical requirements, notably those contained in Annexes I and II of the Convention, the Technical Decisions as well as the Compilation of Acts, and advise on new testing methods;

    c) Organise Round Robins (RR) in line with the RR Guidelines, determine parameters for the evaluation of results, analyse results and recommend conclusions for Convention's Contracting States;

    d) Discuss new practices, which have developed in the Contracting States in the field of assaying and marking;

    e) Identify possibilities for promoting international harmonisation under the Convention;

    f) Make recommendations and/or proposals on technical issues to the Standing Committee, which can accept or reject them.

## 4.2 PROFILE OF STG MEMBERS AND CORRESPONDING MEMBERS

The following profile provides a general description and recommendation to help the Standing Committee appoint STG Members. The description is a recommendation only. It is not mandatory to comply with all requirements.

A "STG Member":

1. is a Member of the SC or of an authorised Assay Office.
2. has experience in the areas of assaying and/or marking e.g. 5-10 years' experience as Assay Master (or Deputy), Head of the laboratory (or Deputy), Head of the Marking Department (or Deputy).
3. is familiar with ISO standards in quality management and precious metals testing (e.g. ISO 9001, 17020 and 17025) and the Convention's technical requirements;
4. is able to communicate in English, both orally and in writing.
5. is available to travel to (one-day) STG meetings, usually two per year (one in Geneva in January/February and one somewhere else between June and August).
6. is able to attend at least one annual meeting of the SC.
7. has the support of his/her Assay Office to work for the STG, attend STG meetings and possibly one annual meeting of the SC (NB: the related travel costs are paid by the Assay Office).
8. is willing to actively contribute to the work of the STG by e.g. submitting proposals, making comments, etc.
9. is available to be consulted by the Secretariat by e-mail or phone on technical issues.

A "Corresponding Member":

1. is a Member of the SC or staff of an authorised Assay Office.
2. agrees to be occasionally consulted by the STG on specific, technical issues by e-mail or phone.
3. has experience in the areas of assaying, marking, etc.
4. is able to communicate in English, in particular in writing.
5. has the support of his/her Assay Office, which agrees to allow him/her to work for the STG.

# Section 5: Secretariat Services

## Background

1. In accordance with paragraph 3 of the Rules of Procedures of the Standing Committee, a Secretariat was appointed to deal with the services and meeting facilities for the Committee and sub-committees.

2. For historical and practical reasons, the Secretariat services have been entrusted to the EFTA Secretariat as from the entry into force of the Convention. The decision was made at the first meeting of the Standing Committee held in Geneva from 21 to 23 October 1975 (PMC/SR 1/75, paragraph 8).

3. In 1995, following the withdrawal of Austria, Finland and Sweden from EFTA and the closure of the "old" EFTA Secretariat, the Chairmen of the Committees set up under the Precious Metals Convention, the Pharmaceutical Inspection Convention and the Pharmaceutical Evaluation Scheme undertook to secure the continuity of the secretariat services so far provided by the EFTA Secretariat.

4. In March 1995, the then Secretary-General of EFTA agreed that the Secretariat services be further provided by the "new" EFTA Secretariat under the condition, however, that all the countries parties to the Conventions and Scheme participate in the cost incurred. The total cost of the secretariat services to the Precious Metals Convention for a whole year, including salaries, insurances, meeting rooms, office space, facilities and supplies, as well as reproduction, telephone, mailing and travel costs would amount to SFR 60,000.-- a year. It would have to be shared by all Contracting States to the Convention.

5. The appointment of the EFTA Secretariat was confirmed at the thirty-ninth meeting of the Committee, which was held in La Chaux-de-Fonds from 17 to 19 May 1995 (PMC/SR 1/95, paragraph 19) but revoked at the fifty-third meeting of the Committee, which took place in Vienna on 15 October 2002 (PMC/SR 2/2002, paragraph 56).

6. On the basis of a Memorandum of Understanding (see Annex 1), signed on 3 October 2003, the Secretariat services have been entrusted to the Pharmaceutical Inspection Co-operation Scheme (PIC/S).

## Secretariat services

7. The secretariat services consist of:

   - the necessary staff at professional level responsible for:
     - the servicing of the Standing Committee set up under the Convention, as well as the working groups, and other workshops organised under the auspices of the Committee,
     - the liaison between the Authorities and their representatives,

- the relation with third countries interested in the Convention, with other related international organisations and with the industry,
- the preparation of guides, reports and other working papers,
- the reproduction and distribution of documents, the editing and issuing of Compilation of Acts of the Committee,
- the dissemination of information on the Convention (Guides, technical papers, etc.),
- the relations with the Depositary State, and any necessary advice and assistance for ensuring the good operation of the Convention,

and

- the necessary offices, technical facilities and meeting rooms.

8. The staff shall constitute the Convention Secretariat.

**Contributions**

9. Each Contracting State, Applicant State and participating Non-Contracting State has to contribute to the cost of the function of the Convention (Secretariat, actions taken by the Convention, gifts, etc.).

10. The contribution of Contracting States, Applicant States and participating Non-Contracting States is defined in Section 7 (Financial Regulations).

11. If necessary, the Standing Committee can adapt contributions to new circumstances.

# Section 6: Guidelines for authorised Assay Offices

## 6.1 GUIDELINE ON RISK MANAGEMENT

***ACKNOWLEDGMENT***

*The Convention on the Control and Marking of Articles of Precious Metals hereby acknowledges that the text, contained in the present Guideline, has been mainly extracted from Annex 20 on 'Quality Risk Management' of the GMP Guide of the Pharmaceutical Inspection Co-operation Scheme (identical with ICH Q8 on Quality Risk Management). The original text of PIC/S appears in black in this document.*

*PIC/S has graciously granted permission to the Convention to adapt the text to suit the purpose of Assay Offices with regard to risk management. The following changes have been done:*

*- The original text has been considerably shortened and streamlined.*

*- While the original text refers to Quality Risk Management (QRM), this text only refers to Risk Management.*

*- While the original text refers to patients, industry and science, this text refers to consumers, Assay Offices and professional knowledge.*

*- While the original text uses the word "might" or "could", this text mentions "may" or "can".*

*Visible changes made by the Convention in the wording appear in blue (with the exception of cuts).*

**INTRODUCTION**

1. This guideline provides general principles related to risk management by Convention assay offices when, following a risk assessment, they are deviating from non-legally binding guidelines and procedures under the Compilation of Acts of the Standing Committee. Risk assessment is an integral part of risk management.

2. Risk management principles are effectively utilised in many areas of business and government including finance, insurance, occupational safety, public health, precious metal control, and by control bodies such as assay offices.

3. It is commonly understood that risk is defined as the combination of the probability of occurrence of harm and the severity of that harm. However, achieving a shared understanding of the application of risk management among diverse stakeholders is difficult because each stakeholder may perceive different potential harms, place a different probability on each harm occurring and attribute different severities to each harm. In relation to the control of precious metal articles, the protection of the consumer by managing the risk, in particular to quality (e.g. incorrect marking of articles, failure to reach the standard of fineness), should be considered of prime importance.

4. It is neither always appropriate nor always necessary to use a formal risk management process (using recognized tools and/or internal procedures e.g. standard operating procedures). The use of informal risk management processes (using empirical tools and/ or internal procedures) can also be considered acceptable.

## PRINCIPLES OF RISK MANAGEMENT

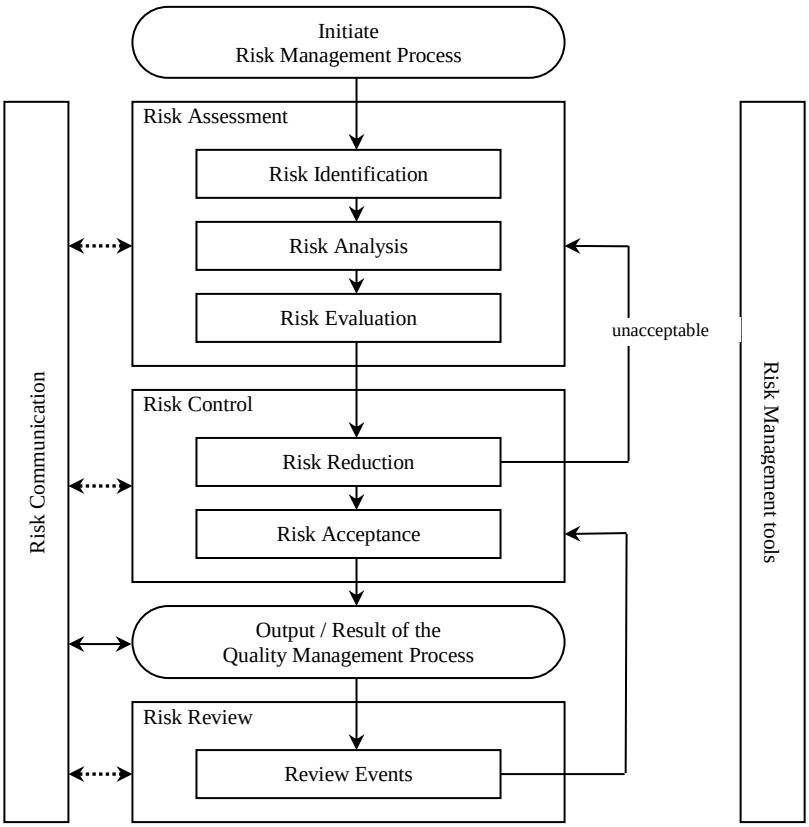
5. Two primary principles of risk management are:

- The evaluation of the risk should be based on professional knowledge and ultimately link to the protection of the consumer; and
- The level of effort, formality and documentation of the risk management process should be commensurate with the level of risk.

## GENERAL RISK MANAGEMENT PROCESS

6. Risk management is a systematic process for the assessment, control, communication and review of risks in the control and marking of articles of precious metals. A model for risk management is outlined in the diagram (Figure 1). Other models can be used. The emphasis on each component of the framework may differ from case to case but a robust process will incorporate consideration of all the elements at a level of detail that is commensurate with the specific risk.

Figure 1: Overview of a typical risk management process



7. Decision nodes are not shown in the diagram above because decisions can occur at any point in the process. These decisions may be to return to the previous step and seek further information, to adjust the risk models or even to terminate the risk management process based upon information that supports such a decision.

**Initiating a Risk Management Process**

8. Risk management should include systematic processes designed to coordinate, facilitate and improve professional decision-making with respect to risk.

**Risk Assessment**

9. Risk assessment consists of the identification of hazards and the analysis and evaluation of risks associated with exposure to those hazards (as defined below). Risk assessment begin with a well-defined problem description or risk question. As an aid to clearly defining the risk(s) for risk assessment purposes, three fundamental questions are often helpful:

    1. What may go wrong?
    2. What is the likelihood (probability) it will go wrong?
    3. What are the consequences (severity)?

10. ***Risk identification*** is a systematic use of information to identify hazards referring to the risk question or problem description. Risk identification addresses the "What may go wrong?" question, including identifying the possible consequences. This provides the basis for further steps in the risk management process.

11. ***Risk analysis*** is the estimation of the risk associated with the identified hazards. It is the qualitative or quantitative process of linking the likelihood of occurrence and severity of harms.

12. ***Risk evaluation*** compares the identified and analysed risk against given risk criteria. Risk evaluations consider the strength of evidence for all three fundamental questions.

13. The output of a risk assessment is either a quantitative estimate of risk or a qualitative ***description*** of a range of risk. When risk is expressed quantitatively, a numerical probability is used (e.g. score). Alternatively, risk can be expressed using qualitative descriptors, such as "high", "medium", or "low", which should be defined

**Risk Control**

14. *Risk control* includes decision making to reduce and/or accept risks. The purpose of risk control is to ***reduce*** the risk to an acceptable level. The amount of effort used for risk control should be proportional to the significance of the risk. Different processes, including benefit-cost analysis, can be used for understanding the optimal level of risk control.

15. Risk control may focus on the following questions:

- Is the risk above an acceptable level?
- What can be done to reduce or eliminate risks?
- What is the appropriate balance among benefits, risks and resources?
- Are new risks introduced as a result of the identified risks being controlled?

16. ***Risk reduction*** focuses on processes for mitigation or avoidance of risk when it exceeds a specified (acceptable) level (see Fig. 1). Risk reduction may include actions taken to mitigate the severity and probability of harm. Processes that improve the detectability of hazards and risks may also be used as part of a risk control strategy. The implementation of risk reduction measures can introduce new risks into the system or increase the significance of other existing risks. Hence, it may be appropriate to revisit the risk assessment to identify and evaluate any possible change in risk after implementing a risk reduction process.

17. ***Risk acceptance*** is a decision to accept risk. Risk acceptance can be a formal decision to accept the residual risk or it can be a passive decision in which residual risks are not specified. For some types of harms, even the best quality risk management practices may not entirely eliminate risk. In these circumstances, it may be agreed that an appropriate risk management strategy has been applied and that quality risk is reduced to a specified (acceptable) level. This (specified) acceptable level will depend on many parameters and should be decided on a case-by-case basis.

**Risk Communication**

18. ***Risk communication*** is the sharing of information about risk and risk management between the decision makers and others. Parties can communicate at any stage of the risk management process (see Fig. 1: dashed arrows). The output/result of the risk management process should be appropriately communicated and documented (see Fig. 1: solid arrows). Communications may include those among interested parties; e.g., assay offices, precious metal operators, consumers, etc. The included information may relate to the existence, nature, form, probability, severity, acceptability, control, treatment, detectability or other aspects of risks. Communication need not be carried out for each and every risk acceptance.

**Risk Review**

19. Risk management should be an ongoing part of the quality management process. A mechanism to review or monitor events should be implemented.

20. The frequency of any review should be based upon the level of risk. Risk review may include reconsideration of risk acceptance decisions.

## INTEGRATION OF RISK MANAGEMENT INTO ASSAY OFFICE OPERATIONS

21. Risk management is a process that supports professional and practical decisions when integrated into quality systems. Effective risk management can facilitate better and more informed decisions and can provide assay offices with greater assurance of a company's ability to deal with potential risks. In addition, risk management can facilitate better use of resources by all parties.

22. Training of assay office personnel in risk management processes provides for greater understanding of decision-making processes and builds confidence in risk management outcomes.

23. Risk management should be integrated into existing operations and documented appropriately.

24. While regulatory decisions will continue to be taken by each assay office, a common understanding and application of risk management principles will facilitate mutual confidence and promote more consistent decisions among assay offices on the basis of the same information. This collaboration is important in the development of policies and guidelines that integrate and support risk management practices.

## DEFINITIONS

Decision maker(s) – Person(s) with the competence and authority to make appropriate and timely risk management decisions

Detectability - the ability to discover or determine the existence, presence, or fact of a hazard

Harm – damage to e.g. quality or security [, including the damage that can occur from loss of product quality or availability]

Hazard - the potential source of harm (ISO/IEC Guide 51)

Quality system – the sum of all aspects of a system that implements quality policy and ensures that quality objectives are met

Requirements – the explicit or implicit needs or expectations of the consumers or their surrogates (e.g. assay offices, regulators and legislators).

Risk – the combination of the probability of occurrence of harm and the severity of that harm (ISO/IEC Guide 51)

Risk acceptance – the decision to accept risk (ISO Guide 73)

Risk analysis – the estimation of the risk associated with the identified hazards

Risk assessment – a systematic process of organizing information to support a risk decision to be made within a risk management process. It consists of the identification of hazards and the analysis and evaluation of risks associated with exposure to those hazards.

Risk communication – the sharing of information about risk and risk management between the decision maker and other stakeholders

Risk control – actions implementing risk management decisions (ISO Guide 73)

Risk evaluation – the comparison of the estimated risk to given risk criteria using a quantitative or qualitative scale to determine the significance of the risk

Risk identification – the systematic use of information to identify potential sources of harm (hazards) referring to the risk question or problem description

Risk management – the systematic application of quality management policies, procedures, and practices to the tasks of assessing, controlling, communicating and reviewing risk

Risk reduction – actions taken to lessen the probability of occurrence of harm and the severity of that harm

Risk review – review or monitoring of output/results of the risk management process considering (if appropriate) new knowledge and experience about the risk

Severity – a measure of the possible consequences of a hazard

Stakeholder – any individual, group or organization that can affect, be affected by, or perceive itself to be affected by a risk. Decision makers may also be stakeholders. For the purposes of this guideline, the primary stakeholders are the consumers and industry

**REFERENCES**

Chapter 1 of the 'Good Manufacturing Practice' (GMP) Guide of Medicinal Products, issued by the Pharmaceutical Inspection Co-operation Scheme (PIC/S)

Annex 20 on 'Quality Risk Management' of the PIC/S GMP Guide (identical with ICH Q8 on Quality Risk Management)

* * * * * * *

## 6.2 GUIDELINES ON CCM MARKING

### Technical & Security Requirements

1. The present Guidelines comprise technical and security requirements for the production and use of punches and laser software (hereinafter referred to as "tools) to apply the Common Control Mark (CCM) on precious metal articles. The Guidelines also contain guidance on the application of the CCM by laser marking and an authenticity verification procedure regarding faked or forged CCM.

2. The purpose of the Guidelines is:

   - to ensure consistency in the quality of the CCM, type 1 and 2, whether it is applied by punch or laser;
   - to harmonise the process of producing CCM tools with a view to have the least differences in the reproduction of the CCM, as defined in the Annexes to the Convention, once it is applied by authorised Assay Offices;
   - to define security requirements for the safe-keeping of CCM tools as well as for the dimensioned technical drawings;
   - to maintain permanently updated risk-based system for ensuring high quality of CCM marks and safe keeping of punches and laser marking tools;
   - to establish a harmonised procedure for the verification of the authenticity of the CCM.

3. The Guidelines contains the following sections and Annexes:

   Section 1: General Provisions;

   Section 2: Instructions regarding the production of CCM tools for type 1 and type 2;

   Section 3: Security instructions for the safekeeping of CCM tools;

   Section 4: Guidance regarding the laser marking of the CCM;

   Section 5: CCM authenticity verification procedure and request;

   Appendix 1: Example of Risk Matrix

   Appendix 2: Recommended Requirements for Contract with Punch Maker

   Appendix 3: Recommendations for Security regarding the Access to both Laser Hardware and Software

   Appendix 4: Guidance regarding the Laser Marking of the CCM

   Appendix 5: Request Form for CCM authenticity verification procedure).

4. It is the responsibility of each authorised Assay Office to act according to the Guidelines and introduce appropriate measures to fulfil its requirements. Each Assay Office should:

   - Comply with the requirements, as defined by the Convention and related documents, in order to achieve the highest marking quality and ensure a secure

marking process by safe keeping marking tools or related information, which could be used e.g. for the forgery of CCM marks;

- Identify, assess and manage risks specific to the CCM marking, the production of CCM tools and laser marks and their safe keeping;
- Develop control measures to eliminate the identified hazards and/or minimise the associated risks according principles introduced by the Guidelines on Risk Management (PMC/W 3/2023). For an example of risk management, see Annex 1.
- Maintain a process for the continuous improvement of the hallmarking process in line with risk management principles.

## SECTION 1: GENERAL PROVISIONS

1. Provisions for the control and the application of the CCM on articles of silver, palladium, gold and platinum are contained in the Convention of 1972 on the Control and Marking of Articles of Precious Metals (PMC/W 1/2010). Article 8 of the Convention requires that Contracting States protect the CCM against "forgery, unauthorised alteration or misuse". Article 10 (2), 6th indent, provides that the task of the SC is "to encourage the adequate protection of the marks against forgery and misuse".

2. The CCM is applied with or next to other compulsory marks, as defined in Annex II of the Convention. The CCM is normally applied on finished or semi- finished articles of precious metals, either in the premises of the Assay Office or offsite (for guidelines on offsite marking, see PS/W 4/2023, latest version). The CCM itself is described in paragraph 5.5 of Annex II to the Convention, as reproduced below:

3. The CCM:
   - is a conformity mark indicating that the article of precious metals has been controlled in accordance with the Convention's requirements, as contained in the present Annexes and the Compilation of Technical Decisions. It shall consist of the representation of a balance in relief on a lined background surrounded by a geometrically variable shield.
   - can be combined with a fineness and precious metal mark: in this case, it is surrounded by a shield indicating the nature of the precious metal and contains a number in Arabic numerals showing in relief the standard of fineness of the article in parts per thousand, as described below (Type 1).
   - can be a conformity mark only: in this case, it is surrounded by a standardised octagonal shield, as described below (Type 2).

| Type 1 | | | | Type 2 |
|---|---|---|---|---|
| Platinum / Platine | Gold / Or | Palladium | Silver / Argent | |
|   |   |   |   |  |

- The approved sizes (height) of the CCM-mark are determined by the SC.
- Paragraph 5.5.2 of the Technical Decisions to Annex II stipulates that "The minimum size (height) of the Common Control Mark and other compulsory marks for all precious metals is 0.5 mm, provided that the mark is legible by means of a 10x magnifying glass." The size of the CCM corresponds to the height between the lowest to the highest points of the shield. The relationship between height and width must be kept.

4. Detailed technical drawings for the manufacture of tools for CCM marks are kept at the Secretariat (see Section 2). For manufacture purposes the authorised Assay Office can request the detailed technical drawings from the Secretariat.

5. The tools for CCM marking shall be punches or software for laser marking.

6. It is the responsibility of each Assay Office to reproduce the CCM in line with the Convention rules, as contained in the Annexes and Technical Decisions to the Convention, which are not reproduced in these Guidelines. The CCM must comply with the description given at Annex II to the Convention and the technical drawings provided by the Secretariat.

7. It is also the responsibility of the Assay Office to be able to identify its own CCM applied on a precious metal article. As a result, Assay Offices must include hidden details in either the CCM or the Assay Office mark, which allow them to clearly identify forged marks from authentic marks.

8. Assay Offices are strongly encouraged to participate in the Round Robin on Marking, which the Standing Technical Group (STG) organises on either punch or laser marking. For the lessons learned during past Round Robins, in particular on laser marking, see Section 4.

## SECTION 2: INSTRUCTIONS REGARDING THE PRODUCTION OF CCM TOOLS FOR TYPE 1 AND TYPE 2

1. The following instructions are applicable to both type 1 and type 2 of the CCM, unless indicated otherwise. For security reasons, different rules apply to the reproduction of the CCM tools by laser than by punch.

### Technical drawings

2. Technical drawings exist for punches and laser marking but not for all CCM types and not for all precious metals and authorised standards of fineness. The drawings are strictly confidential and kept accordingly, where they exist in paper version.

3. For punches, there are dimensioned technical drawings for CCM, type 1 and type 2, as approved by the STG.

   - CCM, Type 1: The 2-dimentional drawings exist for 5 sizes (0.75mm, 1mm, 1.5mm, 2mm, 4mm) for the CCM, type 1 for silver 800, 830, 925, 999; gold 375, 585, 750, 916, 999; and platinum 850, 900, 950, 999. These drawings may contain some minor errors, in particular regarding technical specifications (e.g. angle). The necessary precaution should be taken when using these drawings as a basis. For palladium, there are no technical drawings available with the exception of a sketch, in black and white, of the Pd CCM, without technical specifications, which is available from the Secretariat.
   - CCM, Type 2: There are 2-dimentional technical drawings for the CCM, type 2, for the size of 1mm (these are the same drawings as for laser marking). There are also 3-dimentional technical drawings.

4. For laser marking:

   - CCM, type 1: There are no drawings available for Pt, Au, Pd and Ag.
   - CCM, type 2: There are 2-dimentional skeleton drawings for the CCM, type 2, for the size of 1mm.

5. Authorised Assay Offices, which desire to produce CCM tools, should request the Secretariat to send these drawings by safe means. Drawings should not be scanned and sent electronically, as the control over their dissemination can no longer be ensured.

6. The Secretariat maintains a logbook of all Assay Offices, which have requested the technical drawings, with the date when it was sent to them.

### Punch-Makers

7. CCM punches can be produced:

   - In-house (i.e. within the premises of the Assay Office or within the entity to which the Assay Office belongs, e.g. a national mint); or
   - Externally, through the intermediary of a professional punch-maker.

8. The present guidelines do not apply to the "in-house" production of punches. They only apply to the outsourced production of CCM tools by punch-makers, unless specified otherwise.

9. Only punch-makers, whose name and address appear on the List of CCM Punch-Makers (PS/INF 33/2019, latest version), can be used by Assay Offices. The list is kept up-to-date by the Secretariat based on information provided by Members and can be requested electronically. Punch-makers can be added to / removed from the list.

10. Punch-makers must be technically competent and must be able to reproduce CCM tools within the tolerance limits.

11. Punch-makers must be located in a Convention Contracting State. The reason is that if the punch-maker is located in a third country, in which the Assay Office is not recognised as a legal entity, it may have no power over the punch-maker, if the latter does not abide by the agreement. The only exception is for an EU-based Assay Office to use a service provider in another EU country, which is not part of the Convention, in line with the EU Services Directive

12. The authorised Assay Offices can share the drawings in a secure manner with a punch-makers, subject to the conditions mentioned at Annex 2.

## SECTION 3: SECURITY INSTRUCTIONS FOR THE SAFEKEEPING OF CCM TOOLS

### General

1. Each authorised Assay Office shall take appropriate measures to ensure the safe custody and care of above drawings, punches or software for laser marking in its possession. If a drawing, punch or software for laser marking is stolen or lost, the matter shall be reported without delay to the Standing Committee, together with a report of the circumstances and the steps taken to retrieve it.

2. Every tool which has become obsolete shall be destroyed without delay.

<u>Instructions specific to the Safekeeping of CCM Punches</u>

3. Assay Offices must have a Standard Operating Procedure (SOP) on the use and safekeeping of CCM punches.

4. CCM punches must all be numbered and registered in a logbook.

5. CCM punches, which are not in use, must be kept under lock. Access to the CCM punches is regulated in the SOP.

6. Only staff members involved in the marking and their supervisors shall have present during the marking of the articles. All other staff members and external persons should normally not be in the premises.

Instructions specific to the Safekeeping of Laser Device for CCM Marking (Hardware, Software and Drawings)

**General principles**

7. Assay Offices must have a Standard Operating Procedure (SOP) on the use and safekeeping of laser device for CCM marking.

8. The present instructions address issues, which are specific to the protection of laser device for CCM marking (hardware, software and drawings).

9. The process of laser marking involves hardware and software. Both must be protected equally against unauthorised use.

10. To ensure a minimum level of security, access to both hardware and software should be restricted and protected (for further details, see Annex 3). The basic protection consists of operational measures to restrict unauthorised access to laser system (e.g. access limitation to the location the laser machine is operated or by computer password access).

11. Such methods shall be in line with good practices (e.g. badged doors, secure passwords that are changed regularly, fingerprint reader or individual access card).

## SECTION 4: GUIDANCE REGARDING THE LASER MARKING OF THE CCM;

1. Laser marking can be applied to any articles.

2. Laser marks must strictly respect the shape of the CCM, as defined in the Convention (Annex 2), including the security lines. It must maintain the aspect ratios of the CCM, as defined in the 2-dimentional drawings (see paragraph 3 of Section 2).

3. Laser marks applied with the minimum size of 0.5mm must remain legible and recognisable by an average consumer using a 10x magnifying glass.

4. For additional recommendations, based on lessons learned from previous Round Robin on Laser Marking, see Annex 4.

## SECTION 5: CCM AUTHENTICITY VERIFICATION PROCEDURE

1. A Convention Contracting State is obliged to perform an authenticity verification of its own CCM marks at a request of another Convention Contracting State.

2. The designation of a body responsible for CCM verification is at the discretion of the Convention Contracting State's authorities.

3. A case of CCM marks forgery suspicion usually results in putting precious metal articles under arrest for the time of the investigation; the quickness of response and the effectiveness of communication between Assay Offices involved are essential.

4. Every Convention Contracting State is obliged to notify the Secretariat of an e-mail address to be used for rapid contact between the involved parties.

5. It is also important that the consultation yields a document that can be used in investigative and judicial proceedings.

6. In order to verify the authenticity of CCM marks on a precious metal article(s) the following steps should be carried out:

(i) The authorised Assay Office or National Administration of a Contracting State requesting verification is required to complete PART A of the CCM authenticity verification request form (see Annex 5) and send it at the relevant rapid contact e-mail address.

(ii) The verification request form should contain at least:

- information on time, location and circumstances of finding of articles in question;
- the amount and type of articles;
- a photographic documentation of articles, including close-ups of marks (if the request concerns a sizeable batch - selected representative items should be documented); the images can be embedded into the form or sent as e-mail attachments.

(iii) The recipient confirms via e-mail receiving of the request.

(iv) The recipient verifies the authenticity of marks in question.

(v) The recipient completes PART B of the form, which should contain at least:

- the outcome of verification - CCM hallmark/AO's mark is considered authentic/false/cannot be determined; and
- identification of the responsibility marks - recognised/not recognised.

(vi) The recipient should print the document, put their signature and send the scan back to the requesting body.

7. The procedure should be executed without unnecessary delays in order to not expose the customer/retailer/manufacturer to further losses/expenses and the requesting body to legal liability if the marks were proven to be authentic.

**Appendix 1**

## Example of Risk Matrix

| Risk Types | Risk description | Risk Assessment | | Risk Management (Requirements & Risk Mitigation |
|---|---|---|---|---|
| | | Probability | Impact | |
| **Hallmark Quality Risks** | | | | |
| Risks related to tools and laser marking machines | Low quality punches are produced | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- Each Assay Office to reproduce the CCM in line with the Convention rules;<br>- The approved sizes (height) of the CCM-mark are in use by AO<br>- Minimum size (height) of the Common Control Mark and other compulsory marks for all precious metals must be 0.5 mm<br>**Risk Mitigation: …** |
| | Unappropriated designed tools are in use | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- Punch-makers or laser mark designer must be technically competent and must be able to reproduce CCM tools within the tolerance limits;<br>**Risk Mitigation: …** |
| Risks related to marking process | Low quality marks are applied (punch marking) | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- Appropriate equipment or tools are available and used by AO;<br>- All AO staff related to hallmarking process must by trained;<br>- AO have procedures to ensure quality of marks (such as: SOP, participation in the |

| | | | | |
|---|---|---|---|---|
| | | | | Round Robin on Marking).<br><br>**Risk Mitigation: …** |
| | Low quality marks are applied (laser marking) | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- The laser machine must be properly set, as per manufacturer's instructions (Wrong laser settings, in particular in terms of fine-tuning, can result in double lines, dotted lines, missing lines or over-burn dots);<br>- …<br><br>**Risk Mitigation: …** |
| **Hallmark safety risks** | | | | |
| Risks related to the loss of information or tools | Lost of information during design phase | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- Detailed technical drawings for the manufacture of tools for CCM marks are kept at the Secretariat[1];<br>- Drawings are strictly confidential and the original hard copies are kept by the Secretariat under lock, where they exist in paper version;<br>- Drawings should not be scanned and sent electronically, as the control over their dissemination can no longer be ensured;<br>- The Secretariat maintains a logbook of all Assay Offices, which have requested the technical drawings, with the date when it was sent to them.<br><br>**Risk Mitigation: …** |

| | | | | |
|---|---|---|---|---|
| | Loss of information during production phase | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- Only punch-makers, whose name and address appear on the List of CCM Punch-Makers (PS/INF 33/2019, latest version), can be used by Assay Offices;<br>- The authorised Assay Offices can share the drawings in a secure manner with a punch-makers;<br><br>**Risk Mitigation: …** |
| | Risks related to laser software lost | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- …<br><br>**Risk Mitigation: …** |
| | Unauthorised produce of hallmarks from original files/designs | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- „<br><br>**Risk Mitigation: …** |
| **Forgery risks** | | | | |
| Tool forgery risks | Inability to identify hallmarks | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- Assay Offices must include hidden details in either the CCM or the Assay Office mark, which allow them to clearly identify forged marks from authentic marks.<br><br>**Risk Mitigation: …** |
| Engraving forgery risks | Forgery risks related to laser marking software | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- …<br><br>**Risk Mitigation: …** |

| **Unauthorised use of hallmarks (safekeeping of)** | | | | |
|---|---|---|---|---|
| Unauthorised use | Absence of SOPs | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- Assay Offices must have a Standard Operating Procedure (SOP) on the use and safekeeping of CCM punches.<br><br>**Risk Mitigation: …** |
| | Obsolete punches are not eliminated | [Low – Moderate – High] | [Low – Moderate – High] | **Requirements:**<br>- Every tool, which has become obsolete, shall be destroyed without delay.<br><br>**Risk Mitigation: …** |

**Appendix 2**

## RECOMMENDED REQUIREMENTS FOR CONTRACT WITH PUNCH MAKER

1. The Assay Office can order CCM tools provided that the service provider has signed a contract saying that it can only supply these tools to the Assay Office.

2. The contract must include a confidentiality as well as a non-disclosure agreement and describe how the CCM drawings will be shared.

3. The Assay Office remains at all times the owner of the drawings, electronic files, dyes, master punches and manufactured punches, which must all be kept confidential and under lock.

4. Ownership must specify that drawings, electronic files, dies, master punches, etc. will remain the exclusive property of the Assay Office.

5. Dies and punches are exclusively produced for the Assay Office at the latter's request and in the required quantity. All master punches and punches should be duly numbered. Electronic files must be protected against unauthorised copying.

6. Unused dies and master punches, which e.g. are worn out or contain defaults, must be destroyed. Electronic files must be deleted after use.

7. In the event that the punch-maker ceases its activities or is taken over by another company, it must duly inform the Assay Office, which has the exclusive right to get back drawings, dyes, master punches and manufactured punches. Electronic files must be deleted.

8. Tolerances should be defined.

9. The punch-maker should provide proof of traceability to the Assay Office for all punches they have produced.

10. The punch-makers should not be able to subcontract or outsource unless notifying first the Assay Office. The subcontractor should comply with the same criteria as the punch-makers.

11. In the case of a breach of contract, sanctions should be applied in line with the national law.

* * * * * * *

**Appendix 3**

## RECOMMENDATIONS FOR SECURITY REGARDING THE ACCESS TO BOTH LASER HARDWARE AND SOFTWARE

### Hardware

1. The laser machine consists of:
   - The laser device
   - The controller (usually a PC with the appropriate software, e.g. laser marking programmes)
   - The laser table.

2. The laser machine should be kept in a room protected from unauthorised access. The room may be put under video-surveillance.

3. The laser machine should be equipped with an appropriate level of security access e.g. a security dongle, a mechanical key, or electronic card swipe to prevent the operation of the equipment by unauthorised personnel.

4. The number of authorised operators of the machine should be defined and controlled accordingly.

5. Protocols for security should in place.

### Software and drawings

6. Access to the software used for applying the CCM drawings should be password-protected.

7. The CCM drawings in electronic form should be available in a read-only format. The possibility to edit or copy the drawings should not be possible except for the master copy, which should be stored separately and securely.

8. A digital protocol may be put in place, which enables the software for applying CCM drawings to be activated only if it is used on a specific laser machine. Such a protocol ensures maximum protection.

9. The software for applying CCM drawings may be stored:
   a) Directly on the laser machine;
   b) On a secure and isolated in-house server;
   c) On a portable electronic device (e.g. USB, CD-ROM);

10. The following conditions apply:

    a) If stored directly on the laser machine, the access to the software must be subject to a distinct password, which is different from the security for granting access to the laser machine. The laser PC should be configured in such a way that files cannot be copied, transferred to a portable device or transferred to another device over the internet.

    b) If stored on the in-house server, the software should only be accessible from the laser machine, subject to a separate password. The sever should be configured in such a way that files cannot be copied, transferred to a portable device or transferred to another device over the internet.

    c) If stored on a portable electronic device, the latter should be numbered and kept securely locked (e.g. in a safe) unless it is used for laser marking.

11. The drawings should only be stored on an external disk. In case of non-use, the disk shall be stored separately from the machine in a secure place (e.g. in a safe).

* * * * * * *

**Appendix 4**

## GUIDANCE REGARDING THE LASER MARKING OF THE CCM

1. The following guidance is based on the lessons learned from previous Round Robin on Laser Marking as well as instructions and guidelines applied by Assay Offices.

2. There are two types of marks applied by laser: skeleton marks and deep marks.

3. The most common error found in laser marks is the wrong ratio between width and height of the CCM. Other graphical errors are the wrong shape of the CCM, as defined in Annex II, such as e.g. rounded corners, when they are supposed to be angular, or the wrong font type.

4. The laser machine must be properly set, as per manufacturer's instructions. Wrong laser settings, in particular in terms of fine-tuning or focus, can result in e.g. double lines, dotted lines, missing lines or over-burn dots.

**Laser device installation and technical support services**

5. This section deals with the relation between the Assay Office and any external party performing services that either involve an overt access to CCM files, or may pose a risk of an unauthorised access to them. For general instructions on safekeeping of laser device for CCM marking, see Section 3.

6. The situations of concern include but are not limited to:

   a) installation, testing, adjustment or maintenance of a laser device (either hardware or software);

   b) reproduction from prints, conversion into a different format or adjustment of already existing CCM files.

7. In order to protect files containing CCM drawings, the following rules should be applied:

   (i) CCM laser hallmark files should be stored on secure server on a closed network (not accessible to the internet) or a removable drive. Ideally laser hallmark files should not be stored on the laser machines drive but should be accessed from a common secure drive.

   (ii) If USB drives on the laser equipment should be disabled to safeguard file copying.

   (iii) The necessary service should take place in the AO premises under a supervision. Special attention must be paid to prevent unauthorised access to the files.

   (iv) If the machine is removed from the Assay Office for repair or servicing no CCM hallmark files can be present on the laser machine drive.

(v) A confidentiality as well as a non-disclosure agreement should be concluded if the work involves CCM files access.

(vi) Under no circumstances files containing the CCM can be shared via internet (e-mail or any other service) or using any other media (USB key, CD).

* * * * * * *

**Appendix 5**

## COMMON CONTROL MARK AUTHENTICITY VERIFICATION REQUEST

**PART A – REQUEST FORM** *(to be completed by the requesting Institution)*

| **Requesting institution** | |
|---|---|
| **Institution name:** | |
| **Contact person:** | |
| **E-mail:** | |
| **Tel. no.:** | |

| **Case description** ***(time, location and circumstances of finding)*** |
|---|
| |

| **Suspected articles batch/shipment details** | |
|---|---|
| **Type of articles:** | |
| **Number of articles:** | |
| **Mass of the batch (optional):** | |
| **Precious metal:** | |
| **Verified fineness:** | |
| **Marks present:** | |
| **Relevant pictures** (or list of image files attached)**:** | |

| **Additional information/remarks** |
|---|
| |

**PART B – REPLY FORM** *(to be completed by the verifying Institution)*

| **Recipient institution** | |
|---|---|
| **Institution name:** | |
| **Contact person:** | |
| **E-mail:** | |
| **Tel. no.:** | |

| **Verification outcome** | |
|---|---|
| **Authenticity of the CCM** (*authentic/false/ cannot be determined*)**:** | |

| | |
|---|---|
| **Authenticity of the AO mark** (*authentic/false/ cannot be determined*)**:** | |
| **Responsibility mark validity** (*registered/not registered/cannot be determined*)**:** | |
| **Authenticity of the responsibility mark** (*authentic/false/ cannot be determined*)**:** | |
| **Owner of the responsibility mark** (if registered)**:** | |

| **Additional information/remarks** |
|---|
| |

| **Date** | **Signature** |
|---|---|
| | |

* * * * * * *

## 6.3 GUIDELINES ON INTEGRATED CONTROL AND MARKING PROCESSES (OFF-SITE CONTROL AND MARKING)

1. Off-site marking is defined as "integrated control and marking processes for articles of precious metals applied by an authorized Assay Office in the premises of an economic operator located in the Contracting State".

2. Off-site marking has been authorised by the Standing Committee at its 14th meeting in Geneva on 8-10 May 1984.

3. Since the introduction of off-site marking practices several factors favouring integrated control and marking processes have occurred:

   - Introduction of certified materials in the industrial manufacturing process;
   - Introduction of traceability concepts along the entire production process;
   - Introduction of high-performance X-ray fluorescence spectrometry in control process (conformity assessment);
   - Introduction of a simplified marking system in the Convention, applicable depending of the national legislation (introduction of the single Common Control Mark (CCM), type 2 = one mark for all precious metals and standards of fineness);
   - Increased demand for integrated control and marking due to several benefits such as: reduction of cost for logistics and security, reduction of the safety risks for the Assay Office and the economic operator, reduction of carbon footprint.

4. The purpose of the Guidelines is:

   - to ensure consistency of the quality of the control and marking with the CCM in an economic operator's premises;
   - to specify the minimum mandatory requirements to apply off-site control and marking;
   - to clarify how control and marking processes can be implemented in an economic operator's premises;
   - to define the roles of the Assay Office and the National Administration (e.g. Ministry, Supervisory Agency) in the authorisation and supervision of such activities.

**Minimum Mandatory requirements for off-site control and marking processes**

Legal basis

5. There must be a legal basis for the off-site control and marking processes (depending on national legislation).

Co-operation with an economic operator

6. The economic operator wishing to enter into co-operation for integrated control and marking processes must provide a guarantee of impeccable business operations and an excellent quality reputation through documented procedures and training records. The economic operator must operate a structured quality process demonstrated by regular documented internal audits and documented evidence of continuous improvement processes.

7. Companies have no right to demand from an Assay Office to agree to provide integrated control and marking processes on their premises. The Assay Office has, therefore, the possibility to refuse to be engaged in off-site control and marking in a particular case. The Assay Office can take into consideration various aspects, e.g. customer's ability to meet the minimum requirements, commercial, logistical, security and resource implications, etc.

8. Control and marking processes integrated in an economic operator's premises, in particular the conditions under which the control and marking shall be performed, must be agreed in a written agreement between the Assay Office and the economic operator. The Assay Office shall develop a "model agreement" to be used for all agreements with economic operators having off-site control and marking facilities.

Responsibilities

9. The National Administration, which appoints authorised Assay Offices according paragraph 5 of the Convention, must also scrutinise the compliance of its sub-offices or off-site marking activities in regard of the Convention' rules.

10. Off-site marking is carried out under the responsibility of the Assay Office, which shall ensure that CCM articles are controlled and marked in line with the Convention's requirements in addition to the applicable national legislation.

11. The Assay Office must have the legal power to stop the process immediately in case of failure to comply with the terms of the Agreement.

12. It is the responsibility of the Assay Office to have an adequate internal control system in place and regularly inspect the sub-office.

13. It is the responsibility of the National Administration to adequately regulate the activities of Assay Offices in relation to sub-offices and their compliance with the requirements of the Convention. The supervision of the Assay Office(s) by the Ministry can also be delegated to a third party (e.g. an accreditation body). Compliance checks must be risk-based (see Guidelines on Risk Management). Among other things, the activity (number of articles marked with the CCM) and the legal status of the assay office (governmental or private) are taken into account.

14. The handling of punches and the laser machines shall comply with the applicable national legislation and the CCM Guidelines, as contained in the Compilation of Acts.

15. The Assay Office must provide sufficient training to the staff employed to enable them to carry out the tasks.

Transparency on off-site applied CCM

16. The National Administration shall inform the SC on authorised sub-offices or off-site marking activities applying CCM in its territory on a regular basis. The information shall include the number of off-site activities and the related classified level (low-risk or high-risk).

17. Detailed statistics on the number of articles marked with the CCM, off-site and on-site, shall be kept by the Assay Office, aggregated by the National Administration at national level and regularly communicated to the Secretariat of the Standing Committee.

Sub-Office

18. The Assay Office shall have a sub-office in the premises of the economic operator where the control and marking processes are applied. The sub-office may be either permanently or temporarily staffed and operated by the Assay Office in accordance with the terms of the Agreement.

19. The sub-office shall follow the rules set by the Assay Office with regard to the access to and the use of specified facilities and equipment used to perform the control and marking process. These rules shall include, but not be limited to, the access and use of areas affecting testing activities, prevention of interference on testing activities and effective separation between areas.

Personnel

20. The sub-office shall be operated by permanent staff from the Assay Office (working full or part-time in the sub-office). In carrying out its tasks, the staff shall be independent from the host economic operator. The independence of Assay Office personnel must be specifically noted in a law (for civil servants) or their contracts of employment and in any written agreement with the manufacturer.

21. Assay Office staff must have a direct line of communication to the Assay Office management in order to report any abuse of undue pressure in relation to their independence or the integrity of the process.

22. All tasks related to the control of precious metal articles (conformity assessment and verification of the quality of the applied marks) are exclusively carried out by Assay Office's staff.

23. If the economic operator takes precautions to mitigate risks of producing goods, which potentially fail the quality requirements set up by the Convention, (e.g. by using exclusively "certified material", using exclusively over-alloyed material, enhanced test strategies), pressmarks or laser marks can be applied by the economic operator's staff under the direct supervision of Assay Office staff. This means Assay Office staff must always be present while the marking takes place and must control the quality of the applied marks. Economic operators taking precautions to mitigate risks of producing goods, which potentially fail the quality requirements, are classified as low-risk.

24. If the economic operator does not take the precautions as stated in paragraph 23, or they are e.g. importing pre-manufactured goods from multiple sources, thereby increasing the risk of marking goods that fail the quality standard of the Convention, a tighter testing strategy is required. Economic operators not taking precautions to mitigate risks of producing goods, which potentially fail the quality requirements, are classified as high-risk.

25. For host companies classified as high-risk a tighter testing strategy implies the highest screening level must be applied.

Sampling

26. Sampling shall be done by Assay Office staff in line with the "Guidelines on the methods of sampling" contained in the Technical Decisions of Annex II to the Convention.

Screening and chemical testing

27. The conformity of sampled articles is controlled according to the Convention's provisions. The conformity testing comprises the formal inspection of all affixed marks. The material inspection includes non-destructive testing of the fineness, inspection of any solder connections and surface finishes for their conformity. The formal inspection and the non-destructive testing using a method according to paragraph 3.1 of Annexe II takes place directly at the sub-office.

28. Chemical analysis of the samples taken in the sub-office is performed in the Assay Offices laboratory according to paragraph 3.2 of Annexe II.

Use of Certified Precious Metals Alloys (certified material)

29. Economic operators wishing to exclusively work with "certified material" reduce their risk of producing under-alloyed articles. They benefit from a simplified control process, as chemical analyses are usually carried out prior to the articles are submitted for the control and marking process. The exclusive use of certified material is settled in a written contract between the Assay Office and the economic operator.

30. "Certified material" means "precious metal alloy of a legal fineness, which has been confirmed by a recognised testing laboratory (as defined in paragraph 32), after the last metallurgical treatment but before the manufacturing process.

31. Certified material shall not be subject to any further alloying or any other metallurgical process, which might affect the certified fineness. Sufficient evidence of the certified material must be available for verification at all times.

32. "Recognised testing laboratories" mean laboratories, whose test reports or certificates shall be recognised and which must fulfil the following conditions:

- They must be accredited[12] as a testing laboratory according to ISO 17025 (accredited for the specific scope and testing method);
- They must have highly qualified personnel (certified assayers or equal qualification);
- They must guarantee the full traceability of all results;
- They must participate in a recognised proficiency-testing scheme (PT, Round Robin). The laboratory's performance shall be equivalent of that of an Assay Office under the Convention (Z-Score $\leq |2|$).
- The Assay Office must have access to the audit reports issued by the accreditation body as well as to PT reports.

The National Administration decides which laboratories are recognised.

Traceability

33. The use of certified material requires the traceability of the precious metals' alloys throughout the manufacturing process.

Sampling and Assaying of Certified Material

34. Sampling and assaying are done prior to the manufacturing process.

35. Sampling shall be done by Assay Office staff or the staff of the recognised accredited laboratory according to a written sampling plan approved by the Assay Office.

36. The testing of the fineness must be done by an Assay Office or a recognised accredited testing laboratory.

---

12 The issuing national accreditation body shall be a signatory of the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Agreement.

37. Each tested lot must be accompanied by a test certificate. All data concerning the testing of the certified material shall be kept for at least 5 years and can be audited by the Assay Office staff at any time.

38. Random samples for chemical analyses and non-destructive testing such as XRF or touchstone can be taken by the Assay Office at any time during the manufacturing process.

Marking

39. The marking of articles with the CCM-mark shall be done in line with the Convention's requirements.

40. The quality of the applied CCM in regard of its readability and durability shall be monitored and documented by a quality process in place.

41. The security requirements for the safe-keeping of CCM tools are described in the CCM guidelines.

Steps how to implement integrated control and marking processes

42. An Assay Office that intends to implement integrated control and marking processes in economic operator's premises must follow the following steps:

- The control and marking process must be defined according to the minimum mandatory requirements of this guideline;
- The potential risks must be identified and adequate measures to mitigate the risks must be defined in line with the Guidelines on Risk Management;
- A draft of the written contract between the Assay Office and the economic operator, which lays down the rules of cooperation in accordance with this Guideline, is drawn up;
- The project of an integrated control and marking activity must be submitted to the National Administration;
- If the National Administration does not object to the project within 3 months, the contract can be concluded and the project realised.

The provisions of these guidelines apply throughout the entire period of operation.

43. The present Guidelines shall be applicable as from 1 July 2024.

* * * * * * *

## 6.4 GUIDELINES ON MARKING ARTICLES IN TRANSIT

1. Articles in transit are defined as *"articles which are brought into the country for assaying and hallmarking only, i.e. imported and re-exported immediately"*.

2. Marking articles in transit has been practiced by Contracting States for many years – including with the CCM. It is a well-established practice also known as "in transit service". The practice of CCM-marking articles while in transit was formally authorised by the Standing Committee at its 62nd meeting in London on 14 April 2008.

3. The following rules apply with regard to the CCM marking of articles in transit:

4. Articles brought for marking in transit shall be treated the same way as other nationally produced or imported articles, which are brought for CCM-marking to the Assay Office.

5. Articles in transit may originate from a State, which is not a party to the Precious Metals Convention.

6. Although in transit, the company must register its responsibility mark with the Assay Office or the relevant authority.

7. The marking of articles in transit with the CCM is carried out under the responsibility of the Assay Office, which shall ensure that these articles are assayed and marked in line with the Convention's requirements.

8. Semi-finished articles can only be marked in transit if all metal parts of the article are presented.

9. Spot checks can be carried out by the Assay Office on semi-finished articles, which are marked in transit and then assembled in the company's premises. Some fully assembled and finished articles can be sent for control to the Assay Office at the latter's ad hoc request.

## 6.5 GUIDELINES ON COATING AFTER HALLMARKING

1. When articles are submitted for hallmarking in an unfinished state, the Assay Office usually does not know what kind of surface finishing may be applied after hallmarking. In some countries, coating after hallmarking is prohibited and subject to penalties; in other countries, coating is permitted but the coated articles may be retested, once on the market (as part of Market Surveillance).

2. The following rules apply for the coating of CCM articles:

3. It is a responsibility of the manufacturer to request the authorisation of the Assay Office, if he wishes to coat the CCM articles after the hallmarking process.

4. The request must be made at the same time as articles are submitted for control and marking.

5. The type of coating must be permitted under the Convention's requirements. For the permitted coatings, see paragraph 2.6.1 of the Compilation of Technical Decisions regarding Annex I of the Convention.

6. It is the responsibility of the Assay Office, which has authorised the posteriori coating of CCM articles, to ensure their compliance with the Convention's requirements.

7. Articles, which are coated after the CCM process, cannot be exported or put on the market until the Assay Office has given its expressed agreement. The CCM may be removed from non-complying articles unless the manufacturer undertakes to rectify the matter without delay.

## 6.6 GUIDELINES ON XRF TESTING

### 1 Scope

The ED-XRF technique (Energy-Dispersive X-Ray Fluorescence Spectrometry) is suitable for testing the conformity of precious metal articles under the Convention. ED-XRF can be used to detect and identify metallic coatings, analyse the chemical composition of precious metal alloys whose constituent elements are detectable by the ED-XRF technique.

### 2 Principle

2.1 ED-XRF is an analytical technique used to determine the composition of metal alloys. A primary x-ray beam is focused on the sample to causing energetic interaction. The emitted x-ray photons are detected and measured by the x-ray instrument. Each different element within the sample emits photons with characteristic energy properties: by counting these specific photons it is possible to calculate the concentrations of each element within the sample simultaneously.

2.2 Basically ED-XRF is a quick, reproducible and non-destructive test method. However, due to complex physical factors and interaction processes such as information depth[13], geometry, matrix effects and others, the representativeness of measurements, without an adequate sample preparation and/or without a matrix corrected quantification algorithm, is very poor and can lead to grave systematic errors. Therefore, the use of ED-XRF for the purpose of conformity assessment under the Convention needs, beside a fit-for-purpose instrument and reference material, qualified staff and written procedures in place.

### 3 Application area

3.1 For the purpose of conformity assessment under the Convention ED-XRF can either be used for screening or for quantitative testing. Each of these applications requires a specific test method.

3.2 Screening can be described as a qualitative and semi-quantitative test method. The purpose of screening is to answer the following questions:

- What type of alloy is present (qualitative analysis)? (This is essential to be able to choose the appropriate analytical program and reference material.)

---

[13] The information depth results mainly of the energy of the emitted photons, the take-off angle between the sample and detector as well as the mass attenuation coefficient (more or less its density) of the sample (law of absorption by Lambert-Beer). As a thumb rule the information depth goes along the materials density and lies around 5-10µm for Pt, < 7-12µm << for Au, 30 µm for Pd and < 40µm for Ag.

- Is a coating present or any surface enrichment layer on the articles (qualitative and
  semi-quantitative)?
- Does the solder match with the requirement (semi-quantitative)?
- Does the alloy match with an analysed (quantitative) sample[14]?
- Is the submitted batch homogeneous?

3.3 To apply screening a measurement strategy is required. This strategy defines the number of measurements per sample, the measurement time and the analytical program (quantification algorithm). In order for the testing to be as minimally destructive as possible, the surface layer is only removed on spots, where a coating or surface treatment, cannot be excluded.

3.4 Screening is the first level of testing. If the result of the screening test shows compliance, the articles can be passed for marking[15]. If a result is negative, the articles are rejected and forwarded to the second level of testing – the quantitative testing.

3.5 Quantitative testing (assay) can be described as a method to quantify the precious metal of interest at the highest possible accuracy. Usually, the quantitative methods are harmonised and internationally accepted or are accredited by in-house test methods that are mostly in line with normalised methods.

3.6 ED-XRF can be used as a quantitative method. However, to meet the Convention's requirements, ED-XRF must comply with several requirements e.g. a destructive sample preparation. The exact conditions, under which XRF is authorised under the Convention as a testing method, are described in the Technical Decisions related to Annex II of the Convention (PMC/W 2/2001, latest revision), which reads as follows:

*For all precious metals: X-ray spectrometric method, when the internal method is accredited to ISO 17025 and the measurement uncertainty is equal to or better than that of already accepted methods.*

3.7 This procedure can only be effectively applied subject to compliance with the Convention's requirements, in particular the Guidelines on Sampling, as contained in Annex II to Convention (PMC/W 2/2000 latest revision).

---

[14] Often Assay Offices use defective articles or casting shots, which are submitted with the batch to be hallmarked for chemical analysis (substitutional sample) instead of a finished article. In such cases the energy spectrum of both alloys must be identical. The same approach is applied when prior certified material is submitted for hallmarking.

[15] The decision on passing or failing an article after screening is the Assay Offices' responsibility. In addition, the positive screening result there are usually other information on the history of the sample (history record of the customer, prior certification of the alloy, due consideration of measurement uncertainty specific to the alloy, etc.).

## 4 Equipment

4.1 An ED-XRF spectrometer must comply with the health and safety requirements in place for devices operating with ionising radiation.

4.2 Depending on the scope of application the specification can vary; therefore the following points are recommendations only:

| | |
|---|---|
| – X-Ray tube: | W-target (alternatively Mo, Rh) |
| – Acceleration tension: | 50kV |
| – Primary filters: | Al, recommended for Pt if W-target |
| – Collimator: | radial, one < 1 mm, one > 1 mm |
| – Detector: | Si-PIN, SDD |
| – Long-term stability: | < 0.1% |
| – Spectral resolution: | <180 keV |
| – Algorithm for quantification: | FP (fundamental parameters) |
| – Detectable elements: | Z 22 (Ti) to Z 95 (U) |

## 5 Reference material

5.1 In general, the reference material used for calibrating the ED-XRF measurement programs must be sufficiently characterised and documented. Fundamental points to be characterised and documented are its homogeneity, its chemical composition (ideally matrix matching to the samples) as well as the inherent uncertainty values of all components. The micro structure and surface finish can also be important information.

5.2 Reference material for accredited test must fulfil further requirements in regard to traceability.

5.3 For the purpose of in-house screening methods, reference material of lower characterization may be used if the method is backed by a chemical test method.

## 6 Standard operation procedures

6.1 For the ED-XRF instruments operation and the maintenance an adequate documentation shall be at hand.

6.2 Operational procedures shall be at hand. Their form can be in writing or in another useful form (e.g. interactive online guide).

6.3 A SOP shall be in place on how to prepare samples for measurement in order to ensure maximum measurement quality.

## 7 Staff qualification / Training

7.1 Staff must undergo comprehensive training and testing before being authorised to test articles by XRF analysis. Staff competence should be duly assessed through analysis of various alloy types, which are analysed on each instrument group. A staff member must be able to recognise the alloy type and analyse the material accordingly. The results are assessed by the supervisor and a record of acceptance is made. These alloys are retained for training purposes.

7.2 The process manager (supervisor, laboratory manager) must have the necessary qualification (scientist, certified Assayer, or comparable) to understand and manage the entire process.

## 8 Quality management

8.1 Analytical Quality Control (AQC) is essential for the good operation of XRF testing. Instruments must be calibrated regularly. The calibration algorithm must be defined. Control charts must be put in place. These charts allow monitoring of the instrument's performance and stability.

8.2 A general reference measurement is performed on XRF instruments on a routine basis. This ensures that the peaks seen on XRF spectra are all correctly positioned.

8.3 Reference material (QC standards) are re-analysed if necessary. Readings are recorded. The daily checks and the number of counts measured for the QC standard are recorded on the relevant AQC chart.

8.4 The QC standards should be examined and cleaned regularly to ensure they are tarnish-free.

8.5 Where a new instrument is evaluated, the acceptance criteria are defined by an analysis of QC standards, thus ensuring that the standard deviation of the results is within acceptable limits.

## 9 Results and records

9.1 The results and control sheets are checked by an authorised person within the Assay Office before being released for CCM marking.

9.2 The lower and upper pass limits are calculated by the laboratory. Appropriate correction factors can be used.

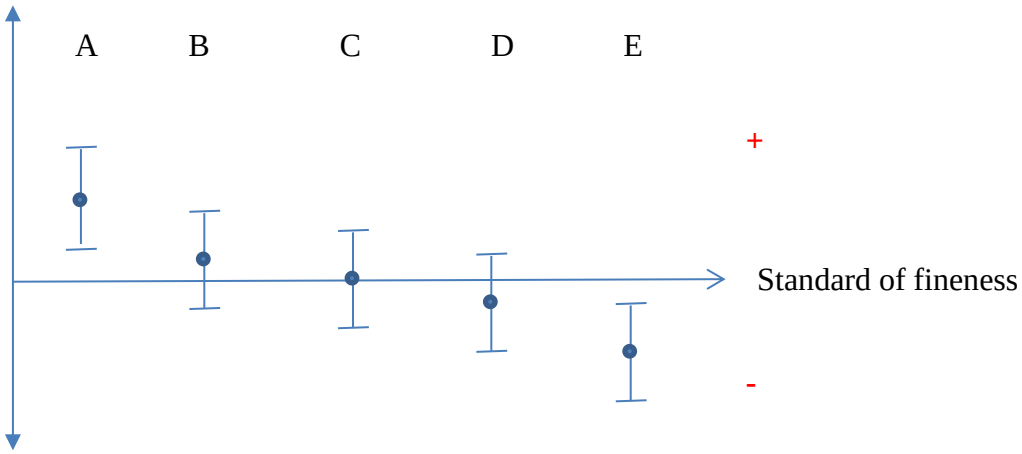
9.3 Records of analysis must be kept for a defined period of time.

## 6.7 SHARED RISK APPROACH

1. Measurement uncertainty is inherent to any testing method. ISO 17025 explicitly requires that measurement uncertainty be taken into account,

2. According to the International Organisation of Legal Metrology (OIML), the shared risk approach is "a common understanding between parties concerned with the outcome of a test that neither party will be given an advantage or suffer a disadvantage concerning consideration of measurement uncertainty." [16]

3. The "shared risk approach" is applicable to all methods of testing. It implies *"to accept as conforming (and reject otherwise) an item whose property has a measured value in the tolerance interval"*[17]. However, as no negative tolerance is allowed under the Convention, the measured value must in all cases be above or equal to the standard of fineness.




Notes:

= Average result

= Measurement of uncertainty (± … ppt)

4. Based on the "shared risk approach", articles tested according to 3.2.1-3.2.4 of the Compilation of Technical Decisions and obtaining a result equal to or higher than the standard of fineness will be marked with the CCM irrespective of the measurement of uncertainty (A, B & C).

---

16 "The role of measurement uncertainty in conformity assessment decisions in legal metrology" OIML G 19:2017

17 BIPM, JCGM 106:2012, Evaluation of measurement data – The role of measurement uncertainty
in conformity assessment

## 6.8 BENCHMARKS FOR XRF TESTING

In relation with XRF testing, the Compilation of Technical Decisions (PMC/W 2/2001 (latest revision)) provides the following:

3.2 The fineness of the precious metals content is determined by one of the following approved methods of analysis:

3.2.5 For all precious metals: X-ray spectrometric method, when the internal method is accredited to ISO 17025 and the measurement uncertainty is equal to or better than that of already accepted methods (11).

(11) This means that the measurement uncertainty of the X-Ray spectrometric method should not exceed the following limits:

- gold ± 0.5‰
- silver ± 1.0‰
- platinum ± 5.2‰
- palladium ± 5.8‰

The above-mentioned limits (= benchmarks) are established as follows:

- In principle, the benchmarks to be achieved should be ≤ 2 x the mean value of the reproducibility standard deviations during the last five Convention's Round Robins.
- The benchmarks are defined by the SC based on a proposal of the STG.
- The STG calculates the benchmarks based on historical RR data (see table below), rounded to the next decimal.

| RR | RR | **Au** | RR | **Ag** | RR | **Pt** | RR | **Pd** |
|---|---|---|---|---|---|---|---|---|
| 1 | 39 | ± 0.21 ‰ | 40 | ± 0.39 ‰ | 41 | ± 1.30 ‰ | 36 | ± 4.11 ‰ |
| 2 | 37 | ± 0.24 ‰ | 38 | ± 0.42 ‰ | 31 | ± 2.61 ‰ | 25 | ± 1.82 ‰ |
| 3 | 34 | ± 0.23 ‰ | 35 | ± 0.85 ‰ | 21 | ± 2.27 ‰ | 15 | ± 2.71 ‰ |
| 4 | 33 | ± 0.28 ‰ | 32 | ± 0.44 ‰ | 12 | ± 3.40 ‰ | | |
| 5 | 30 | ± 0.25 ‰ | 29 | ± 0.42 ‰ | 11 | ± 3.30 ‰ | | |
| mean sR (5 years) | | ± 0.24 ‰ | | ± 0.50 ‰ | | ± 2.58 ‰ | | ± 2.88 ‰ |
| 2 x sR (95%) | | ± 0.48 ‰ | | ± 1.01 ‰ | | ± 5.15 ‰ | | ± 5.76 ‰ |
| **Rounded** | | **± 0.5 ‰** | | **± 1.0 ‰** | | **± 5.2 ‰** | | **± 5.8 ‰** |

- The benchmarks are considered stable over time and can be updated by the STG either on request of the SC or if a significant change occurs (e.g. higher performance of the analytical technology).

# Section 7: Financial Regulations

Collection of the Annual Fee

1. The Convention Secretariat shall be responsible for collecting the annual fee due from Contributing States and Organisations, as listed in the table below, as well as issuing receipt according to the following:

(a) The Secretariat must send out calls for the payment of the fee covering the following year, by official invoice, no later than 31 October of each calendar year;

(b) The invoice shall indicate the annual fee to be paid and give the following options:

* Payment by 30 April of the next calendar year = 100% of the fee

* Payment after 30 April of the next calendar year (but before 31 October) = 120% of the fee.

(c) Any credit or arrears (e.g. unpaid invoice) should be deducted from or added to the annual fee;

(d) By June of each calendar year, the Secretariat will send a reminder to those Contributing States and Organisations, which have not paid their fees yet;

(e) Contributing States and Organisations, which have failed to pay their fees by 31 October of the current financial year, will be invited by the Chairman to explain the reasons for the delay;

(f) The Chairman shall make recommendations to the Standing Committee regarding late payers;

(g) The Standing Committee shall take the appropriate measures to deal with the late or non-payment of annual fees.

Payment of other fees

2. The Convention Secretariat shall be responsible for collecting other fees, as listed in the table below, as well as issuing receipt according to the following:

(a) The Secretariat will issue invoices for other fees (meeting fee, RR fee, etc.), which shall be normally paid within 30 days;

(b) The non-payment of an invoice within the time limit will have for consequence that the related service (e.g. meeting attendance, delivery of RR samples, etc.) will not be granted.

Fees

All figures in Swiss Francs

| | **Annual Fee** | **Meeting Fee per person (pp)** | **RR Fee per RR participant[18]** |
|---|---|---|---|
| **A) STATE** | | | |
| Member State / Contracting State | 9,345 | - | 525 (yearly / per participant[19]) |
| Applicant State | 4,675 | - | 525 (yearly / per participant) |
| Observer State | 1,870 | > 1p: 210pp | 525 (for up to 2 samples);<br>790(for 3 samples) |
| Guest State | - | 315pp | 525 (for 1 sample)<br>790 (for 2 samples)<br>1,050 (for 3 samples) |
| **B) ORGANISATION** | | | |
| Technical Programme Participant | 935 | - | 525 (yearly / per participant) |
| Observer Organisation | 935 | > 1p: 210pp | 525 (for up to 2 samples);<br>790(for 3 samples) |
| Guest Organisation | - | 315pp | 525 (for 1 sample)<br>790(for 2 samples)<br>1,050 (for 3 samples) |
| **C) OTHERS[20]** | - | - | 525 (for 1 sample)<br>790(for 2 samples)<br>1,050 (for 3 samples) |

* * * * * * *

18 As defined in the RR Guidelines (i.e. 1 Assay Office, without branches or sub-offices)

19 All alloys, XRF & chem

20 E.g. Assay Office of a non-UN Member State

Annex 1

**MEMORANDUM OF UNDERSTANDING**
*between the*
Pharmaceutical Inspection Co-operation Scheme (PIC/S)
*and the*
Convention on the Control and Marking of Articles of Precious Metals
(Precious Metals Convention)
*on the*
Administration, Operations and Financing
*of the*
Convention Secretariat

1. The following is a Memorandum of Understanding (MoU) between the Pharmaceutical Inspection Co-operation Scheme (PIC/S) and the Convention on the Control and Marking of Articles of Precious Metals (Precious Metals Convention) concerning the establishment and functioning of the Convention Secretariat.

2. PIC/S herewith agrees to provide secretariat services to the Precious Metals Convention. The services shall be rendered by the PIC/S Secretariat Staff, who shall constitute the Convention Secretariat.

3. In exchange for the services rendered by PIC/S, Members and Observers of the Precious Metals Convention shall pay an annual membership fee, which shall finance the operations of the Convention Secretariat. The amount of the fee is reviewed periodically and agreed by mutual consent. An overview on how fees have been used during the year shall be provided by PIC/S to the Precious Metals Convention.

4. Upon request, PIC/S can make available a bank account to the Precious Metals Convention, which can be used for specific programmes and projects. While the bank account is in the name of PIC/S, the use of the money can only be decided by the Standing Committee of the Precious Metals Convention.

5. The Convention Secretariat is technically attached to the PIC/S Secretariat. It assists the Standing Committee of the Precious Metals Convention (and other entities, set up by the Committee) in carrying out related activities under the direct supervision of the Chairman of the Standing Committee.

6. When carrying out activities for the Precious Metals Convention, the Convention Secretariat will be autonomous and follow its own procedures.

7. The Chairman of the Standing Committee and the PIC/S Chairperson shall oversee that the activities of the Convention Secretariat are carried out in accordance with the provisions of this MoU.

8. The Precious Metals Convention shall be consulted on matters related to the administration, operations, staffing and financing of the Convention Secretariat.

9. This MoU will be valid for the period from the date of signature by the parties concerned to the end of the budgetary year. It will be tacitly renewed, year after year. It can be terminated by one of the two parties subject to a 12-month written notice. Amendments to this Memorandum of Understanding may be proposed by PIC/S and the Precious Metals Convention for consideration by both parties.

Signed on 9 December 2019*

| | |
|---|---|
| ……. | …….. |
| Scott Walter | Boon Meow Hoe |
| Chairman | Chairman |
| Standing Committee | PIC/S Committee |
| Precious Metals Convention | |

* Original MoU signed on 3 October 2003

Annex 2

## DECLARATION OF CONFIDENTIALITY & ABSENCE OF CONFLICT OF INTERESTS

I, *[name]*, representing *[name of authority]* agree to comply with the following conditions:

Article 1

I pledge, subject to the provisions of article 2, to respect the confidentiality of all the information (written and oral) received in relation with meetings under the Precious Metals Convention [Standing Committee, Standing Technical Committee, etc.] or sent to me by the Secretariat, other Members and Observers. I shall use the information only within the framework of the Precious Metals Convention.

Article 2

The commitments resulting from article 1 are permanent, but will not apply:

- to information available to the public at the time it is supplied;
- to information that a third party has communicated to me lawfully without a confidentiality agreement
- to information required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory body.

Article 3

I have taken good note of the classification of information & documents and the restrictions on the (further) circulation distribution of restricted[21]" information & documents. I undertake not to share any classified information & documents with outsiders (e.g. trade).

Article 4

I declare that I have no conflict of interest with issues discussed at Convention meetings [Standing Committee, Standing Technical Committee, etc.] and that I will spontaneously inform (i) the Secretariat in advance of a meeting; or (ii) all participants at the beginning of a meeting, should one item for discussion under the draft Agenda represent a potential or real conflict of interest.

Place & Date:
Signature:

[21] Is considered "restricted", information which is sensitive (test or assessment results, etc.) and whose circulation should be limited to those it is intended to. To be considered restricted, documents or communications must be circulated with the word "restricted".

Annex 3

**"Memorandum of Understanding" (MoU) for Non- Members**

**The Secretariat of the Convention on the Control and Marking of Articles of Precious Metals**

c/o PIC/S
Rue de Saint-Jean 26
CH – 1203 Geneva
Switzerland
www.hallmarkingconvention.org

Represented by:

Family name, first name
Position
+41227389215/6
info@hallmarkingconvention.org

and

**Name of Ministry, Assay Office, Organisation**

Street, no
City
Country
Website

Having applied to become:

(…) Technical Partner Participant (TPP)
(…) Observer (OBS)

Represented by:

Family name, first name
Position
Phone
E-mail

Have agreed on the following:

## 1. Scope

The present Memorandum is limited to the co-operation between the above-mentioned parties and the participation of the TPP/OBS in activities of the SC subject to the conditions spelled out in the Compilation of Acts of the SC.

## 2. Rights & Obligations

2.1 The TPP/OBS has the following rights:

2.1.1 To participate in:

a) SC meetings and discussions unless they are confidential;

b) Sub-Committees and Working Groups unless they are purely Convention-related; and

c) Round Robin (RR).

2.1.2 To be consulted on:

a) Technical issues (e.g. on RR) with the exception of Technical Decisions and the Convention's Annexes; and

b) Regulatory issues if the regulations of the Non-Member are aligned with those of the Convention.

2.1.3 To receive:

a) SC and sub-committee meeting documents unless they are confidential or strictly reserved for Members; and

b RR reports, if it has participated in the RR.

2.2 The TPP/OBS has the following obligations:

2.2.1 To pay fees, as defined in the SC's Financial Regulations. NB: Invoices are issued by the Pharmaceutical Inspection Co-operation Scheme (PIC/S), which provides secretariat services to the Convention.

2.2.2 To comply with the SC's Guidelines on the Sharing of Information, Confidentiality and Conflict of Interest and sign annually a declaration of confidentiality, as contained in the Compilation of Acts.

## 3. General

3.1 This Memorandum of Understanding will come into force upon signing by both parties.

3.2 It may be amended by both parties, subject to mutual agreement.

3.3 It may be suspended or terminated by either party, subject to prior notification in writing three months beforehand.

3.4 Paid fees will not be reimbursed. Arrears are due irrespective of whether the Memorandum has been suspended or terminated.

3.5 Disputes will be resolved by mutual negotiations. If not successful, they can be subject to arbitration in line with internationally accepted arbitration practices.

| | |
|---|---|
| Signature | Signature |
| Date | Date |