NAJ Code of Practice

PRODUCT SAFETY FOR JEWELLERY AND WATCHES

Version 2. June 2026.

Introduction

This Code of Practice aims to assist UK businesses in the jewellery industry in understanding and fulfilling their obligations under the General Product Safety Regulations 2005 (GB GPSR). The EU Regulation on General Product Safety 2023/ 998 (EU GPSR) and the Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH) regulations.

Specifically.

- Nickel Release: [Entry 27 of annex 17 (REACH)]
- Lead Content: [Entry 63 of annex 17 (REACH)]
- Cadmium Content: [Entry 23 of annex 17 (REACH)]
- GPSR: from a skin allergy point of view.

Any supplier of products designed for direct and prolonged skin contact, which may contain nickel or its compounds, lead, or cadmium, will be subject to the above regulations. Examples include:

- Earrings and other body piercing items
- Necklaces, bracelets, chains, anklets, and rings
- Wristwatch cases, straps, and fasteners

Compliance with these regulations is crucial to ensure that all jewellery products sold on the market are safe for consumer use and meet the legal requirements.

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Scope of Guidance

This guidance is applicable to all businesses involved in the manufacture, import, export, distribution, and retail of jewellery products. The safety of goods in Great Britain is governed by the General Product Safety Regulation 2005. In Northern Ireland and the EU, this is the EU General Product Safety Regulation 2023/988.

The legislation covering the restrictions on nickel, lead or cadmium is found in assimilated Regulation (EC) No 1907/2006 *concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).* The UK REACH and EU REACH regulations now operate independently from each other. UK REACH regulates chemicals placed on the market in Great Britain (GB) - England, Scotland and Wales, while EU REACH continues to apply in Northern Ireland under the terms of the Northern Ireland Protocol.

REACH UK Regulations

Understanding REACH

REACH is a chemical regulation that aims to ensure a high level of protection for human health and the environment from the risks posed by chemicals, covering all chemicals/ metals used in jewellery manufacturing. In jewellery, restricted substances which require strict compliance are **Nickel, Lead, Cadmium and Phthalates, (Phthalates can be found in plastic jewellery components)**.

It is important to note that even if you are not a jewellery manufacturer or importer you should check with your supplier that the products comply with REACH and GPSR regulations.

Nickel, Lead, and Cadmium in Products

- **Nickel** is commonly found in trace amounts in most metals, including coins. Jewellery and products in direct contact with skin must not release more than 0.5 micrograms per square cm of nickel per week, and 0.2 micrograms per square cm for the post assembly used in piercings. Coated products must maintain this limit for at least two years of normal use.
- **Lead** is used in jewellery to add weight, brighten colours, or stabilize plastics but is toxic and accumulates in the body. Jewellery must not contain 0.05% or more lead by weight, except for exemptions like crystal lead glass.
- **Cadmium**, used in jewellery for technical attributes, is restricted to 0.01% (100 mg/kg) by weight. It may be present in alloys, solder, coatings, or non-metal components, but is recognized as a toxic carcinogen when ingested or inhaled.

Phthalates

Phthalates are a family of chemicals used as plasticizers to increase the flexibility and durability of plastics.

Importers and manufacturers are restricted from placing on the market articles containing the following four phthalates in a concentration equal to or above 0.1% by weight individually or in any combination in any plasticised material

- Bis (2-ethylhexyl) phthalate (DEHP)
- Dibutyl phthalate (DBP)
- Benzyl butyl phthalate (BBP)
- Diisobutyl phthalate (DIBP)

In addition, the following phthalates shall not be used as substances or in mixtures, in concentrations greater than 0,1 % by weight of the plasticised material, in toys and childcare articles which can be placed in the mouth by children. We include here necklaces and bracelets aimed at children, as well as those for adults, but which may foreseeably be mouthed by young children.

- Di-'isononyl' phthalate (DINP)
- Di-'isodecyl' phthalate (DIDP)
- Di-n-octyl phthalate (DNOP)

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UK REACH and the EU REACH regulations operate independently from each other. Companies that are supplying and purchasing products to and from the EU/EEA/Northern Ireland and Great Britain (England, Scotland and Wales) will need to ensure that the relevant duties are met under both pieces of legislation.

General Product Safety Regulations (GB GPSR)

The GB GPSR provide the main basis to ensure consumer goods are safe for normal or foreseeable use. Under GB GPSR, manufacturers and importers are termed **"producers"** and retailers, online platforms and wholesalers of consumer goods whose actions do not affect the safety of the goods are termed **"distributors"**. Both producers and distributors have certain obligations such as ensuring traceability and monitoring product safety.

For jewellery, the GB GPSR will cover the safety of areas that are not covered by REACH, for example, does the design produce sharp edges that may cause harm to the user, are appropriate warnings in place for jewellery that is aimed at children to ensure it is not given to children and babies under the age of 3 because of the choking hazard. It will also cover statements such as "nickel free" aimed at nickel allergy sufferers.

Second Hand Jewellery

The **GB GPSR** also applies to those products sold second hand. If a retailer is in any doubt as to the safety of a product, they should not sell it. See 'General product safety: distributors' for more information.

Distributor Obligations *(Jewellery retailers, wholesalers and online shops)*

Distributors must ensure they supply only safe products. Due diligence steps must be taken to avoid the sale of products known or suspected to be dangerous, such as those subject to recalls.

Distributors are required to:

- Provide consumers with information to assess risks and take precautions during use by passing on product warnings and instructions.
- Maintain product traceability, keeping records of purchases and sales for at least six years, which also fulfils GB GPSR requirements.

If a product is found to be unsafe, the supplier must be notified immediately, or, if necessary, inform Trading Standards. Distributors must also cooperate with enforcement authorities and take action to mitigate risks. Non-compliance is an offence under GB GPSR.

Retailers, both new and second-hand, should also check that a product has not been recalled, and if it has then they must comply with that recall. See; https://www.gov.uk/product-safety-alerts-reports-recalls

Producer Obligations *(Jewellery manufacturers and importers)*

Jewellery products are consumer items, therefore jewellery producers must ensure they supply safe products and provide clear, durable warnings and instructions to help consumers assess and mitigate risks throughout the product's use.

Key obligations include:

- **Traceability:** Mark all products with a batch or serial number and maintain records to trace products back to their origin.
- **Labelling;** must be clear, legible, and prominently placed on the product or its packaging. For products with limited space, this information may be provided in the accompanying documents
- **Monitoring:** have a sampling strategy in order to test products, keeping in mind factors such as production samples, changes in materials or processes and specific properties of the jewellery.

- **Documentation:** Maintain comprehensive documentation on safety assessments, including test results and safety measures.
- **Risk Assessments and Reporting:** If a product is found to be unsafe, implement corrective actions, notify Trading Standards in writing with product details, risks, and actions taken.

Testing and Compliance

- **Testing of raw materials.** Depending on the size of your business, you should obtain test certificates from suppliers, carry out audits on your suppliers and/or carry out tests on raw materials to ensure compliance with REACH.
- **Third-Party Testing.** Carry out regular product testing for compliance with REACH and GB GPSR using accredited laboratories.

Records: Ensure documentary evidence is kept of the safety of products.

By adhering to this guidance, businesses in the UK jewellery industry can ensure compliance with GB GPSR and REACH regulations, protecting consumer health and safety. This commitment to legal compliance will not only safeguard consumers but also enhance the reputation and success of businesses in the industry.

Compliance for EU and Northern Ireland Markets

Please note: This part of the guidance cannot be assured

For UK Businesses Selling Jewellery and Related Goods in Europe and Northern Ireland

The EU General Product Safety Regulations 2023/988 have now replaced the General Product Safety Directive, introducing enhanced requirements for product safety, transparency, and traceability.

Key updates include:

1. Appointment of an EU Responsible Person:

- Businesses selling jewellery in the EU or Northern Ireland must appoint a Responsible Person (also known as an EU Rep), who will act as the main point of contact for product safety and compliance.
- This representative must be based in the EU and cannot be based in the UK.

2. Product Traceability:

- Jewellery products must be traceable, meaning they should include identifying information, such as a batch number or serial number, in a way that is visible and accessible to consumers. If the product is too small for direct labelling, this information can be provided on the packaging or in accompanying documentation. This ensures safety and transparency in the marketplace, allowing authorities to track products in the event of safety issues.

3. Compliance for Online Sellers:

- If you are selling jewellery through any online platform or retail outlet, you will need to ensure that your listings include the contact details of your EU Responsible Person.

4. Additional Legal and Record-Keeping Requirements:

- Both manufacturers and EU Representatives must maintain proper documentation to prove that the jewellery products meet safety standards.

For products intended for the EU market, a comprehensive technical file must be maintained, containing essential data, for example, manufacturer or third party supplier details, description of product, composition, product safety risk assessment, any certificates. This technical file must also be shared with the appointed EU representative to ensure compliance with regulatory requirements.

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5. What You Need to Do:

- If you sell into the EU or NI, appoint an EU Responsible Person
- Ensure that your product listings, packaging, and any retail partner information include the EU Responsible Person's contact details.
- Failure to comply could result in your jewellery products being removed from the market, impacting your sales.

Defining 'products' for the purpose of EU GPSR compliance

There is confusion about what constitutes a 'product' for the purposes of GPSR compliance. Companies have been panicked looking at the volume of their SKUs and thinking about potential AR costs and the burden of maintaining technical files. It is possible to group SKUs to reduce the overall burden and cost. Look at your product range and try to group products according to their a) purpose i.e. what they are, b) composition i.e. what they are made of, and c) their risk profile i.e. safety information that you must provide to customers. You'll find that this will dramatically reduce the volume.

By ensuring compliance with the updated EU GPSR, your jewellery business will be well-positioned to meet new regulatory standards and continue selling in the EU and Northern Ireland markets.

Further Support for GPSR Export Compliance.

To help businesses adapt to the new EU GPSR, the **Trader Support Service (TSS)** offers free support and guidance.

How the TSS Can Help:

- **Education and Advice:** Provides comprehensive training and advice about the changes to goods movement requirements.
- **Customs Declarations:** Completes customs and safety/security declarations on your behalf for movements between Great Britain and Northern Ireland, so you don't need direct access to HMRC systems.

You can use this free service if you, move goods yourself or act on behalf of others, such as a haulier.

- For more information and to register, visit the **Trader Support Service website**. Sign up for the Trader Support Service - GOV.UK
- Sign up for the newsletter at The Global trade Department for regular updates on GPSR. Resources - Global Trade Department
- If you have questions or concerns, contact:
  OPSS enquiries:
  OPSS.enquiries@businessandtrade.gov.uk
  Cabinet Office support:
  wftf-sgim@cabinetoffice.gov.uk

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In Summary

- All entities in the distribution chain are responsible for placing a safe product on the market
- Consumers must be provided with the necessary information to evaluate the risks of the product during its normal use.
- Competent authorities must be informed if a product poses health risks once placed on the market.
- Authorities responsible for market oversight have the authority to report, ban, withdraw, or destroy any product that is hazardous to health.

Training and Awareness

Staff Training and Course Providers

- Product Safety: Train all staff involved in the production and sale of jewellery on product safety requirements and procedures.
- REACH Compliance: Ensure staff understand REACH regulations and the importance of compliance in sourcing and manufacturing.

Birmingham Assay Office provides a comprehensive course on product safety within the jewellery industry; https://academy.theassayoffice.co.uk/product-category/one-day-courses/

Trading standards also offer product safety training; Business Certificate of Competence in Product Safety (BCCPS) (tradingstandards.uk)

General FAQs

Q. Does a jewellery retailer bear responsibility for product safety?

A. Under GPSR and REACH while manufacturers and importers carry primary responsibility, retailers are key players in the supply chain and have a duty to ensure that the products they sell do not pose risks to consumers.

Retailers must ensure that the products they sell are compliant with safety regulations. This includes verifying that the jewellery they offer has undergone appropriate safety assessments and that the necessary documentation, such as compliance certificates and test reports are available.

Q. How do jewellery retailers do this, what are sensible measures/processes to put in place?

A. What would be considered to be appropriate due diligence to prevent the supply of unsafe products, will depend on the size of the distributor, but to do nothing would never be sufficient. Jewellery retailers can ensure product safety under GPSR and REACH regulations by:

1. **Supplier Verification:** Work with reputable suppliers and check that products comply with the regulations, you should obtain up-to-date safety documentation, including REACH compliance certificates. Larger businesses would be expected to audit suppliers.

2. **Staff Training:** Train staff on GPSR safety requirements, REACH regulations, incident reporting, and customer communication. Especially where certain items may have warnings attached to them or other information that needs to be passed onto customers.

3. **Ongoing Monitoring:** Regularly audit practices and update policies to stay compliant with GPSR safety standards and REACH regulations.

These steps help retailers meet their responsibilities, ensuring consumer protection and regulatory compliance.

Q. Does existing safety compliance still apply with GPSR?

Yes, REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) still applies alongside the GPSR. The GPSR focuses on overall product safety,

traceability, and labelling, while REACH specifically regulates the use of chemicals in products, ensuring they do not pose a risk to health or the environment. Businesses must comply with both**.**

Q. Is there a product test to mitigate complaints from customers of sensitive skin reactions aka contact dermatitis?

A. Yes, The **AnchorCert Protect Test** is a certification process from AnchorCert Analytical at Birmingham Assay Office that checks jewellery for allergens by testing for 16 elements, focusing on nickel, cobalt, and lead. It simulates sweat and wear conditions to ensure minimal metal release over time. If jewellery passes, it receives the AnchorCert Protect certification, assuring it is safe for sensitive skin and meets EU standards for hypoallergenic materials.

Q. What is the EU Safety Gate Portal?

A. The **EU Safety Gate Portal** (formerly RAPEX) is the EU's rapid alert system for dangerous non-food products, including jewellery. It provides alerts on unsafe products, risks, and required actions, helping businesses ensure compliance and protect consumers. Although the UK is no longer part of the EU, UK jewellers can still benefit from monitoring the EU Safety Gate to:

1. **Stay Informed**: Monitor alerts for jewellery-related risks (e.g., nickel, cadmium, lead) to ensure products meet UK and EU safety standards.
2. **Mitigate Risks**: Address potential safety concerns proactively to avoid trading issues.
3. **Protect Reputation**: Align with global safety standards to build consumer trust, especially for EU exports.
4. **Market Adaptation**: Ensure products meet EU safety regulations for cross-border trade.

Access the portal at EU Safety Gate to stay updated.

FAQs Regarding Product Export

Q. Can the EU Authorised rep role be filled by a non-professional, such as a friend or family member in the EU?

A. The individual must be available to liaise with relevant authorities and understand technical data files. They also must have adequate liability protection should the worst happen, and something goes wrong with the product. Therefore, although possible, it isn't recommended to place a friend or family member in this role.

Q. What about products already on the market that were manufactured pre December 13th 2024?

A. The Regulation applies only to products placed on the market from 13 December 2024; no action needs to be taken for products that have already been placed on the market in NI before 13 December 2024 and which are in compliance with the 2005 GB GPSR.

Q. What if I sell older items where I do not have the manufacturers compliance assertions or information about the items' safety?

A. If this information is impossible to obtain, for example, because of the age of item, then the seller needs to run their own risk assessment and document the findings. Antique items (that which are over 100 years old) are exempt.

Q. What if my jewellery is sold through online platforms – do I need to make changes?

A. Yes, online platforms are covered by EU GPSR. If you sell jewellery online in the EU or Northern Ireland, you must ensure your listings include the contact details of your EU Responsible Person. Platforms like Amazon or eBay may require this information to stay compliant.

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Q. Do I need to change my packaging to comply with EU GPSR?

A: If your jewellery is sold in the EU or Northern Ireland, you must include the contact details of your EU Responsible Person on your packaging or product listings. This ensures compliance with EU GPSR and provides a clear point of contact for regulatory issues. If selling in both regions you can supply GB and EU contact details.

Q. What if I'm selling jewellery through third-party distributors or retailers?

A. You still need to ensure that your jewellery is compliant with EU GPSR, including appointing an EU Responsible Person. If selling through third parties, you must confirm that your products meet EU GPSR requirements, including product traceability and labelling.

Q. Can all compliance information be included in a QR code on the product rather than bulky labelling?

A. At the present time it is best to follow the advice in the EU GPSR which is that product safety information should be included in the accompanying documents if it is not practical to include on a label.

Analytical Testing

- Search UKAS accredited organisations
- Jewellery Testing | Sheffield Assay Office
- Jewellery Testing - REACH regulation - Assay Office (anchorcertanalytical.com)
- Hypoallergenic Anchorcert Pro | testing against Lead, Cadmium and Nickel. (theassayoffice.co.uk)

Further Information

For detailed guidance, refer to official documents available on the UK government's website or consult with relevant regulatory bodies.

- **GB GPSR 2005**; General Product Safety Regulations 2005: Great Britain - GOV.UK (www.gov.uk)
- **EU GPSR 2023/988**; EU Regulation 2023/988 on General Product Safety: detailed guidance - GOV.UK
- **UK REACH**: UK REACH Explained (hse.gov.uk)
- **Jewellery safety**: metal content | Business Companion
- **General product safety**: distributors | Business Companion
- **General product safety**: producers | Business Companion
- **Product safety**: due diligence | Business Companion
- **NAJ Contact**: international@naj.co.uk for assistance with product movement issues.

NAJ Professional Standards Definitions

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Code of Conduct

The NAJ Code of Conduct is a set of rules and standards based on honesty, integrity and professionalism that members MUST abide by. The honouring of this commitment to the Code of Conduct sets members businesses apart from others.

Code of Practice

An NAJ Code of Practice is a set of rules regarding a particular subject. Most often, these Codes of Practice are translations of existing UK law. A Code of Practice provides explanations of how to uphold the law. Members MUST follow these codes in order to remain legally compliant.

Guidance Notes

An NAJ Guidance Note is a document produced to help members better understand their obligations in various areas. Guidance Notes can be on various subjects and are not always based on a specific UK Law. Members are expected to follow these instructions as best practice, although there is no statutory requirement. Guidance notes will be considered by The NAJ Professional Technical Standards Group for elevation to a Code of Practice after a period of two years has elapsed since their publication.

Disciplinary Procedure

The NAJ Disciplinary process is a series of steps that the NAJ can take to address member behaviour that falls short of the expectations as set out in the Code of Conduct.

These documents are live documents and subject to continued review; they can all be accessed on the NAJ website here; Codes of Practice (naj.co.uk)

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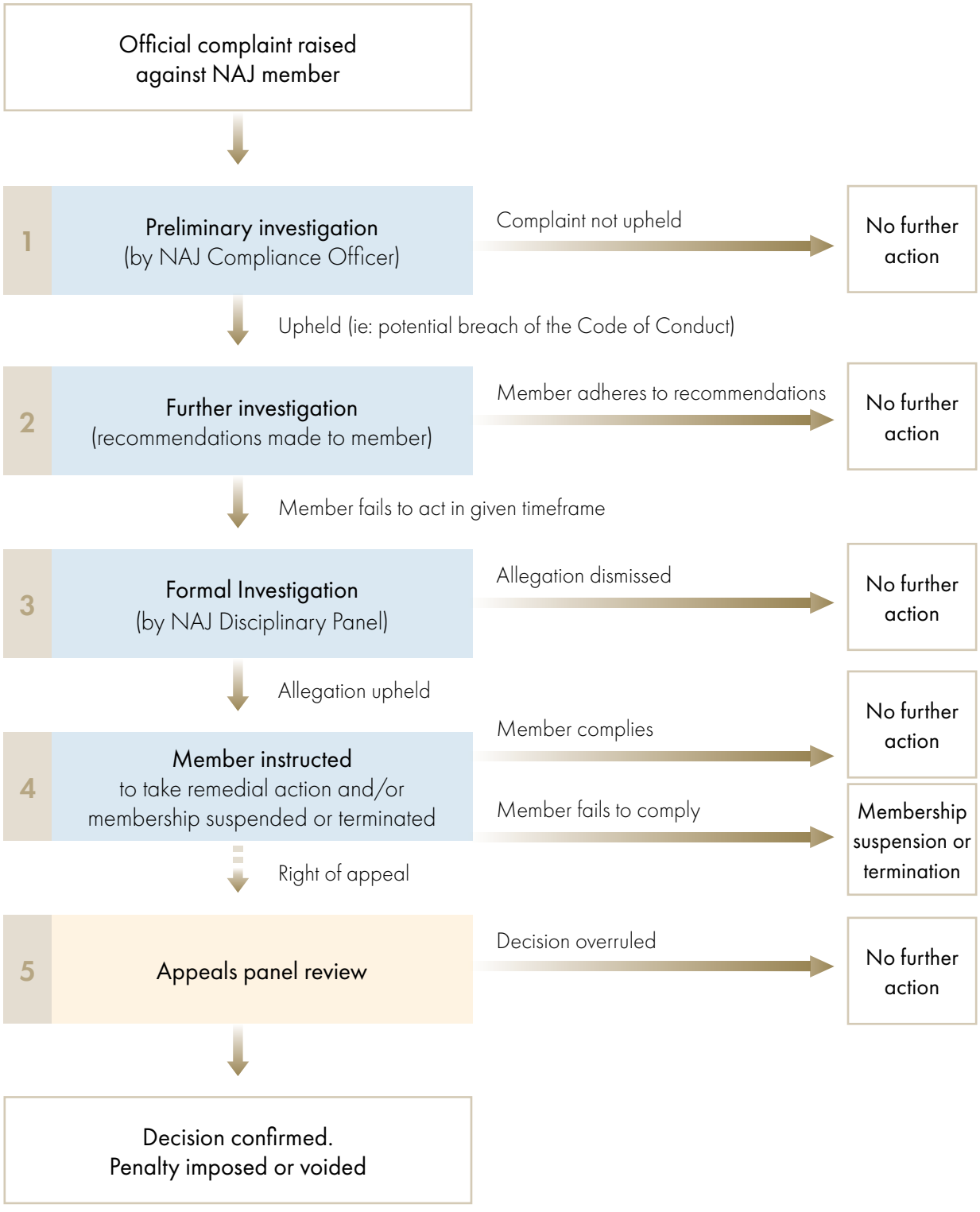
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