

GIA (Gemological Institute of America) was founded 81 years ago with the specific mission to ensure the public trust in gems and jewelry. As a public-benefit, nonprofit institution, we take that mission seriously and welcome the opportunity to respond to the Federal Trade Commission's request for comment on the jewelry industry marketing guides. Our responses are based on the sustained, advanced research conducted in our laboratories by GIA gemologists and on our scientific examination of more than two million diamonds, colored gemstones and pearls each year.

GIA takes no position as to the merits of any treatment, manufacturing technique or other process applied to or resulting in the creation of any material marketed or sold as a gemstone or other element of jewelry. However, GIA firmly believes that all applied treatments, techniques or processes must be disclosed to ensure that the consumer is completely informed as to what they are purchasing.

**Can lead-glass-filled composite stone accurately be identified as a natural ruby or gem, even when the disclosures are made that the stone has been treated?**

The FTC guideline should prohibit identifying lead-glass-filled composite stones as natural ruby or gem.

The guidelines should require clear disclosure whether any stone sold as a gem is filled or assembled from multiple parts using a foreign substance as a filler/binder, or is a natural coherent whole that has been 'treated' to alter its appearance (clarity, color or similar).

This disclosure should be made whenever a filler/binder is used, whether in a relatively insignificant amount or when it makes up a major portion of the volume and weight of the stone.

GIA refers to gemstones that are held together by an artificial binder or are assembled from multiple pieces with the use of an artificial binder or filler as 'manufactured products.' Any GIA identification report on a manufactured product clearly describes the components.

**Use of 'cultured' to identify synthetic diamond material**

The FTC guideline should prohibit the use of the term 'cultured' to describe synthetic diamond material.

In the gem and jewelry industry, and in the general public understanding, 'cultured' refers to a cultured pearl resulting from a naturally-existing process that was initiated in a living organism by artificial means. In contrast, the highly technological and energy-intensive process for producing synthetic diamonds takes place wholly under laboratory conditions. Use of the term 'cultured' could mislead consumers into believing that synthetic diamonds share the provenance and rarity of natural diamonds.

Terms other than 'cultured' can accurately convey to consumers that the material is diamond but that it is not natural, for example "lab-grown", "man-made" or "(name of company)-created."

**Specific disclosures relating to freshwater cultured pearls**

The FTC guidelines should require disclosure of both the fact that a cultured pearl was grown through an artificially-initiated process and the conditions under which the pearl developed, i.e. in fresh or salt water. Because there can be variations in price between saltwater- and freshwater-cultured pearls, adequate disclosure of the growth environment will reduce the possibility that consumers may be confused by the use of the word 'cultured' alone.

As with all gems, any treatments, i.e. dyeing to artificially color the final product, should be disclosed.

## **About GIA**

Founded 81-years ago, GIA is an independent, public-benefit, nonprofit organization, GIA works to ensure the public trust in gems and jewelry through education, research, laboratory services, and instrument development and by upholding the highest standards of integrity, academics, science, and professionalism.

More than 50 years ago GIA created the international standard for describing diamond quality: the 4Cs (Color, Cut, Clarity and Carat Weight) and the GIA International Diamond Grading System™, which includes the D-to-Z color scale, the Flawless-I3 clarity scale, and the Excellent-Poor cut grading scale. Coupling advanced research with the detailed examination of more than two million diamonds and colored stones each year, GIA leads the industry in detecting new gem materials - including synthetics - and new gem treatments.