

Federal Trade Commission

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Office of the Secretary

600 Pennsylvania Avenue, NW, Room CC-5610 (Annex O)

Washington, DC 20580

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RE: CFR Part 23, Guides for the Jewelry, Precious Metals, and Pewter Industries; Project No. G71100116.

Dear FTC Commissioners and Staff,

Thank you for the continued opportunity to provide comments and for undertaking the latest revision of the Guides for the Jewelry, Precious Metals, and Pewter Industries (TheGuide). FTC is tasked with providing rules to assist the Industry and Consumers in providing a fair understanding to the rules of the road when selling and advertizing industry products along all stages and transfers of the products to the final end-using consumer. TheGuide is an invaluable tool and both Industry and Consumers continue to consistently indicate and understand that TheGuide's retention is imperative in a market which has always been ripe for deception. The FTC provides the rules to instruct US Industry on ways to avoid deception and its success largely depends on Industry related Trade Associations (here and abroad) to disseminate the rules and implement secondary guidance to their members, the industry at-large, and consumers who are all looking for a sense of fairness and confidence that the products they trade and buy meet certain truthful standards.

Unaddressed Deception harms a market's viability so that regardless of a person or entity's place in the world, position along the market chain, or reasonableness. Successful Consumer Protection makes or breaks any measurable success. The FTC operates three branches of Bureaus: Competition, Consumer Protection, and Economics and coordinates the purposes to complement each other to fulfill the tasked Mission 'to prevent business practices that are anticompetitive or deceptive or unfair to consumers; to enhance informed consumer choice and public understanding of the competitive process; and to accomplish this without unduly burdening legitimate business activity. Undoubtedly international trade ensures that no market or system operates in a bubble today. Worldwide, Trade Associations and Industry Members-at-large know, support, and fully understand that without a confident consumer base there is no industry viability; all of them are equally concerned with the promulgation of FTC's, TheGuide to promulgate their own rules, which are for the same reasons and equally based in their part, on preventing deception to ensure fair competition and strong economics. Clearly avoiding deception is always the first concern when one needs a vibrant market built and based on a willingness to buy, so regarding that end, international nomenclature is, by its virtue, written to clarify and protect the same

end-users here as there and for the same reason as is intended for our implementation of TheGuides here. For many There, the rules promulgated and mandatory for them are issued by the ISO (International Organization for Standardization) which is then promoted for compliance by groups and associations within their market. Here, those rules and standards are voluntary and it's our compliance with FTC which is mandatory and supersedes any other and we have groups and associations which similarly promote compliance. That said, deception is deception and knows no borders. FTC is urged to careful consider how the proposed promulgation of TheGuides will effect and strengthen, or weaken, consumer protections and compliance abilities here and simultaneously, independent of international standards, promulgate rules against deception that are understood by those affected and tied with the known forces of modern trade.

The current revision, begun in 2012, has brought several topics to the forefront and the ongoing request process for public comment during revision is truly appreciated. Topics and questions at the forefront of this revision cover many Sections of TheGuide and decisions will have far reaching and long term consequences for all. Current requests for public comment include but are not limited to public perception concerning general deception and misleading illustrations; "hand-made," and "hand-polished" term use; measuring and marking metals; and gemstone issues including diamonds and pearls.

[<http://luc.edu/media/lucedu/law/centers/antitrust/pdfs/publications/workingpapers/USConsumerProtectionFormatted.pdf>][https://www.ftc.gov/sites/default/files/documents/reports_annual/sentinel-cy-2009/sentinel-cy2009.pdf]

§23.1 Deception (general).

(P. Deception Generally and Misleading Illustrations [FTC call p. 126-127])

It is unfair or deceptive to **use, as part of any advertisement, packaging material, label, or other sales promotion matter, any visual representation, picture, televised or computer image, illustration, diagram, or other depiction which, either alone or in conjunction with any accompanying words or phrases,** misrepresent the type, kind, grade, quality, quantity, metallic content, size, weight, cut, color, character, treatment, substance, durability, serviceability, origin, price, value, preparation, production, manufacture, distribution, or any other material aspect of an industry product.

NOTE 1 TO §23.1: If, in the sale or offering for sale of an industry product, any representation is made as to the grade assigned the product, the identity of the grading system used should be disclosed.

NOTE 2 TO §23.1: To prevent deception, any qualifications or disclosures, such as those described in the guides, should be sufficiently clear and prominent. Clarity of language, relative type size and proximity to the claim being qualified, and an absence of contrary claims that could undercut effectiveness, will maximize the likelihood that the qualifications and disclosures are appropriately clear and prominent.

NOTE3 TO §23.1: An illustration or depiction of a diamond or other gemstone that portrays it in greater than its actual size may mislead consumers, unless a disclosure is made about the item's true size.

~~§23.2 Misleading illustrations.~~

~~It is unfair or deceptive to use, as part of any advertisement, packaging material, label, or other sales promotion matter, any visual representation, picture, televised or computer image, illustration, diagram, or other depiction which, either alone or in conjunction with any accompanying words or phrases, misrepresents the type, kind, grade, quality, quantity, metallic content, size, weight, cut, color, character, treatment, substance, durability, serviceability, origin, preparation, production, manufacture, distribution, or any other material aspect of an industry product.~~

~~NOTE TO §23.2: An illustration or depiction of a diamond or other gemstone that portrays it in greater than its actual size may mislead consumers, unless a disclosure is made about the item's true size.~~

FTC proposes to delete §23.2 and retain its NOTE TO, moving and renaming the Section 23.2 note to NOTE 3 TO §23.1. It reads like the intent is to eliminate and delete the advertizing verbiage of Section 23.2 in its entirety from TheGuides. Considering the importance of the examples given in the list, and that the second part of Section 23.2's sentence is exactly same as Section 23.1's it is hoped that the resulting revision will look like the example above. It seems the move of NOTE TO §23.2 unaccompanied by the list of marketing examples cannot serve purpose well by depending on the vaguer language contained in §23.1 and their inclusion in §23.1 strengthens §23.0(c). Please clarify the end results of this proposal to remove the Advertizing Examples List of §23.2 from TheGuide for this revision proposal. If removed from TheGuides would like to know how future marketers and readers will be informed against these types of misleading illustrations and still be able to reasonably extrapolate any new forms of advertizing which may not be in use today?

**§23.3 Misuse of the terms "hand-made," "hand-polished," etc.
(Q. "Hand-Made" Claims [FTC call p. 127-129])**

(a) It is unfair or deceptive to represent, directly or by implication, that any industry product is hand-made or hand-wrought unless the entire shaping and forming of such product from raw materials and its finishing and decoration were accomplished by hand labor and manually-controlled methods which permit the maker to control and vary the construction, shape, design, and finish of each part of each individual product.

NOTE TO PARAGRAPH (a): As used herein, "raw materials" include bulk sheet, strip, wire, **precious metal clays, ingots, casting grain**, and similar items that have not been cut, shaped, or formed into jewelry parts, semi-finished parts, or blanks.

(b) It is unfair or deceptive to represent, directly or by implication, that any industry product is hand-forged, hand-engraved, hand-finished, or hand-polished, or has been otherwise hand-processed, unless the operation described was accomplished by hand labor and manually-controlled methods which permit the maker to control and vary the type, amount, and effect of such operation on each part of each individual product.

This section, §23.3 Misuse of terms “hand-made,” and “hand-polish,” etc., generates a lot of questions and confusion for consumers and small businesses that do metal clay, wirewrap, or other jewelry crafting and is also an expressed concern regarding the incorporation of gemstones not shaped by the crafter or metalsmith of an otherwise hand-created jewelry item. Technological advances make it increasingly not uncommon that mass produced faceted gemstones are now cut entirely by machine in some cases [<https://www.youtube.com/watch?v=amVz27fkIV8>]. What is the FTC’s guidance to this new technology that removes hand cutting of gemstones from the process? In current FTC call for public comment another question is raised about hand-made status to “include products cast from hand-carved or hand-modeled wax or from hand-made molds” etc., without providing a “basis for why these processes meet the Guides’ criteria for “hand-made.” Likely, the connected question for the commenter’s request concerns the advancing technology of 3D CAD and 3DPrinting for modeling and molds which are probably considered machine made not hand-made[<http://www.3dprinter.net/3d-printing-shaping-way-gold-jewelry-made>]. Please provide guidance on this up and coming technology to separate it from traditional casting methods. Finally, the same commenter asked for clarification on preformed parts of the whole hand-made piece or “incidental findings.” FTC reply implies that some small percentage of preformed parts would not exclude the non-deceptive claim of “hand-made.” ... “Finally, the Commission does not propose amending the Guides to address “incidental findings.” The Commission clarifies, however, that to the extent consumers may find the incorporation of such minor, pre-formed items material to a “hand-made” claim, it would be deceptive to make this claim without further qualification.” (FTC call p.129). This goes back to reasonable consumer issue. What is a reasonable percentage of the whole here? For example, a pendant made from precious metal clay (PMC) uses a preformed bail. Can the maker of this otherwise “hand-made” piece non-deceptively call their work “hand-made”? Thank you for the FTC proposal to update §23.3 and include: pmc, ingots, and casting grains, in TheGuide’s list of “raw materials.” Their inclusion is not deceptive as they are used to create “hand-made” pieces of jewelry.

§23.4 to §23.10 Metals

Rhodium Plating Disclosure: Thank you for proposing new Rhodium disclosure regarding this issue. Rhodium and Platinum are both used extensively as plating over “white” gold today. Platinum plating should also be disclosed for same reasons as Rhodium. All Plating wears off and most reasonable consumers have no idea at the care requirements for their Solid “fine” Gold jewelry. For some discussion on the basis and pitfalls of the issue please see link which provides a reasonable outlook and represents how many consumers learn, after the fact, about their purchase. The

thread is interesting and while not a statistical-metric it does indicate the realities that few and rare consumers actually know about until they know about this process, or any other myriad of examples, that commercial White Gold has frequent re-plating needs with heavy wear.

[\[http://www.finishing.com/131/32.shtml\]](http://www.finishing.com/131/32.shtml).

Vermeil karat increase: Vermeil is another precious metal plated product that more consumers know about. Gold over Silver is a common phrase to describe it and I think most consumers that know about vermeil expect the gold to be a higher fineness than TheGuide as currently written, and also they expect the silver to be Sterling. For an internet shopper these examples might represent how a reasonable consumer would see a vermeil piece to buy^[1] and then if they wanted to know more about the item might look to see what it is here or many other similar sites available^{[2][3]}. A visit the counter at a Department Store where typically their use of higher gold fineness and sterling silver makes a good selling point to promote the value of the pieces sold. The main issue with plated products is re-plating it if you wear it much and want to keep it looking its best and finding someone to re-plate is not really that easy to do^[4]. To understand durability issues better, Commission plans updates based on new durability testing. Commission asks for information specific to “set the safe harbor at 15 millionths of an inch using 22 karats. The Commission seeks additional information to determine whether an electrolytic application of 7 millionths of an inch of 22 karat gold would be adequate to assure reasonable durability.”

¹[\[http://www.neimanmarcus.com/gold-vermeil-necklace-th.html\]](http://www.neimanmarcus.com/gold-vermeil-necklace-th.html)

²[\[http://www.jewelnotes.com/what-is-gold-vermeil/\]](http://www.jewelnotes.com/what-is-gold-vermeil/)

³[\[http://invoguejewelry.blogspot.com/2013/10/gold-filled-or-gold-vermeil-which-is.html\]](http://invoguejewelry.blogspot.com/2013/10/gold-filled-or-gold-vermeil-which-is.html)

⁴[\[http://www.spectrummetalfinishing.com\]](http://www.spectrummetalfinishing.com).

A reasonable consumer might not know about re-plating issues until they happen to them but it is safe to say most consumers do seem to understand the quality grades for all three precious metals products. Consumers usually understand the numbers go higher the purer the metal within but it is not usually typical that they understand the percentages of precious metal contained that makes the quality numbers. This would be especially true for gold products with their karat classification. To learn more a consumer could begin a visit at a site such as these for the basics of precious metal purity grade. The Australian site breaks down the percentages, and you will find information like this easier if looking for it because it is common for international standards; they use them and not so much for US standards who do not.

[\[https://www.consumer.ftc.gov/articles/0293-gold-silver-jewelry\]](https://www.consumer.ftc.gov/articles/0293-gold-silver-jewelry)

[\[http://gilletts.com.au/jewellery-metal-information-i-39.html\]](http://gilletts.com.au/jewellery-metal-information-i-39.html)

[\[https://help.cbp.gov/app/answers/detail/a_id/342/~stamping-requirements-for-precious-metal%2C-gold%2C-silver%2C-or-platinum-jewelry\]](https://help.cbp.gov/app/answers/detail/a_id/342/~stamping-requirements-for-precious-metal%2C-gold%2C-silver%2C-or-platinum-jewelry)

Commission questions feasibility of using percentages in response to technological advances in gold alloy processes and manufacturing which employ less than the current minimum US standard of purity, 10k. Reasonableness and realities would dictate that switching from karats on gold products

to parts per thousands would require a long transition period for US sellers and consumer saturation would take even longer. Had we been able to adopt metric system it would be an easier transition. Outside the United States, most measurements are metric and most American consumers do not understand metrics; changing purity measurements on gold would be challenge but if sellers wanted to begin listing such information on their marketing materials it would be good thing. This new alloy product is colored gold throughout the alloy and has a high gold-purity look. It is not plated or bonded and it is said it does not tarnish or lose its luster. There is likely a large market for this low cost alternative to solid gold. Consumers need to understand the product. Lowering the limit for karat designations is probably the least deceptive way to accomplish this. There is an interesting juxtaposition to me between the ongoing nomenclature debate over using the “qualified” term “cultured” for the understood meaning of Lab-created diamonds etc., and this new gold alloy needing to accurately and non-deceptively market their product with disclosure to prevent deception. Their technologies are impressive and both products hold huge potential for consumer acceptance and market shares; their marketing needs for disclosure should concern reaching target markets as simply as possible.

[\[http://press.tiffany.com/News/NewsItem.aspx?ID=172\]](http://press.tiffany.com/News/NewsItem.aspx?ID=172)

§23.11 To §23.26 Gemstones

§23.0 Scope and application.

- (a) These guides apply to jewelry industry products, which include, but are not limited to, the following: **natural** gemstones, **their treatments**, and their laboratory-created and imitation substitutes; natural and cultured pearls, **their treatments**, and their imitation **substitutes**; and ... These guides also apply to articles...fabricated from precious metals (gold, silver and platinum group metals), precious metal alloys, and their imitation **substitutes**.

Natural is to gemstone as Pearl is to Natural. It really is that simple and if the goal is to First accurately and non-deceptively describe and convey truth in advertizing for the consumer market of industry products then the term natural matters because a higher expectation for use of the term natural helps to head off the frequency of otherwise undisclosed treatments. FTC declines defining natural during this revision of TheGuide and request further evidence of consumer understanding of the word natural in regards to gemstone. If studies have been done on the topic they are not readily accessible but I would point to any evidence FTC gathered during the 1996 review (FTC call p. 97) and point out that this review was concurrent with the industry just learning of new non-disclosed treated products and it also preceded other new technologies of that time that still today now hold a dominant position of industry sales. I'd propose these treatments relay that the importance of Section 23.-(c) is undeniable yet is little understood by consumers and so these gemstones remain often undisclosed today and that their increase in value is significant enough to always require disclosure. Today, because of stones like these the advise is if you don't know its treated or not assume treated whether you are a seller or a consumer. Not qualifying natural to treated allows disclosure issues to fester. Ftc call p.98 Section 23.24 (now renumbered as Section 26) states it is unfair or deceptive to use the word “natural” to describe “any industry product that is manufactured or produced artificially.” so it is hoped that with passing time more consumers will become reasonable and the next revision will accept including the further guidance on the matter. And also it is seen that the “intent” of the definition of natural is contained within the

text of TheGuide sufficiently for now in 23.22 and 23.24 among other references and therefore reasonable sellers and marketers should understand it and disclose treatments.

Commission refers to reasonable consumers often as the basis for what is deception. When it comes to gemstone treatments Consumers can't reasonably understand what they aren't privy to so the definition of reasonable consumer is misleading in that part. Fortunately, Reasonable Industry Trade Groups, appraisers, Gem Labs, Industry Journals and Magazines, and Industry Schools do what they can to interpret and promulgate TheGuides and they attempt to reach sellers and marketers. The Trade Association, AGTA, is one that promulgates FTC meaning of minimal disclosure requirements for all levels of the trade and congruently strengthens much of their disclosure requirements for members based on CIBJO BlueBook recommendations. Their guidebook for disclosure is shared publicly and available to both outside sellers and marketers and also consumers so reasonable people across the board can access if they know about it. The other side of that coin is that some of these same industry group-types are increasingly using their gemstone reports and publications not as a strictly scientific marker as they used to (i.e. for the identification and measurable quality factors of a loose gemstone or piece of jewelry) but instead, and reported by them, at request of sellers, they are more and more often adding perceived value to their reports as marketing tools. The marketing nomenclature borrows regional and subjective historic trade color designations mostly. One example we are seeing is the current trend of claiming a color-name designations without any general consensus of what the color is in a measurable term. In the past all a report provided was a color number or grade. Currently the trend is that for this part of a report it's all in the trade's color-name. Further, it is already seen that by using marketing color nomenclature it can easily lead to unrealistic and inflated values placed on a otherwise less valuable stone. This use of color-nomenclature also leads to some appraisals being used to support claiming unrealistic and inflated values on the stones. This type of extraneous and often misleading marketing nomenclature may become another large issue as time goes by. It is no surprise that this industry's public comment periods are unanimous in that TheGuides be retained, basically, in perpetuity.

-Are gemstone beads included in FTC's gemstone definition? What about ornamental stone?

Traditionally, gemstone refers to a single mineral and ornamental stone to a rock which is defined as having more than one mineral. Lapis Lazuli is one of many examples of an ornamental stone. Please provide guidance on beads made of gemstones and ornamental rocks and include their protection in Section treatments.

-Does proposal to allow synthetic diamonds to market themselves as "qualified-cultured" now extend to other synthetic gemstones? If not, why not? What separates the mechanical manufacture of synthetic man-made diamonds from their counter-parts like ruby, sapphire, emerald, spinel, aquamarine, garnet, amethyst, alexandrite, opal, etc.?

Education and Guidance

[\[http://www.cibjo.org/introduction-to-the-blue-books/\]](http://www.cibjo.org/introduction-to-the-blue-books/)

[\[http://www.agta.org/gemstones/agta-gim.pdf\]](http://www.agta.org/gemstones/agta-gim.pdf)

[\[http://www.wildfishgems.com/treatment\]](http://www.wildfishgems.com/treatment)

[\[http://www.gia.edu/gem-treatment\]](http://www.gia.edu/gem-treatment)

[\[http://www.thenaturalsapphirecompany.com/education/\]](http://www.thenaturalsapphirecompany.com/education/)

[\[http://www.agta.org/gemstones/index.html\]](http://www.agta.org/gemstones/index.html) [\[http://www.gia.edu/gem-encyclopedia\]](http://www.gia.edu/gem-encyclopedia)

Sellers and sales tool examples for marketing

[<http://gemologyonline.com/treatment.html>]

[<http://www.jewelrywise.com/just-for-you/article/what-you-need-to-know-about-lab-created-stones>]

[<https://www.gemsociety.org/article/gemstone-treatment-and-enhancement/>]

[<http://www.gia.edu/gia-news-press/report-check-enhancements-colored-stone-reports>]

[<http://gemresearch.ch/an-ethical-debate-concerning-pigeons-blood-and-royal-blue-for-corundum-from-diverse-origins/#>]

[http://www.ssef.ch/fileadmin/Documents/PDF/Press_release_Pigeonblood_Royalblue_SSEF_GGL_final.pdf]

[<http://lotusgemology.com/index.php/lab>]

[<https://www.hadardiamonds.com/catalog/what-are-gia-hpht-diamonds>]

[<http://www.lioridiamonds.com/hpht-diamond>]

[<http://www.hphtdiamonds.com/>]

On a side note: Natural Confusion among consumers with a moving goal post concerning food labeling with some similarities to apparent reality of “natural” food and natural-treated gemstones.

[<http://www.cbsnews.com/news/what-does-natural-really-mean-on-food-labels/>]

[<http://www.click2houston.com/consumer/what-does-natural-really-mean-when-it-comes-to-food>]

Colored Gemstones, Diamonds, Pearls

§23.22 Disclosure of treatments to gemstones.

It is unfair or deceptive to fail to disclose that a gemstone has been treated if:

- (a) The treatment is not permanent. The seller should disclose that the gemstone has been treated and that the treatment is or may not be permanent;
- (b) The treatment creates special care requirements for the gemstone. The seller should disclose that the gemstone has been treated and has special care requirements. It is also recommended that the seller disclose the special care requirements to the purchaser;
- (c) The treatment has a significant effect on the stone's value. The seller should disclose that the gemstone has been treated.

NOTE TO §23.22: The disclosures outlined in this section are applicable to sellers at every level of trade, as defined in §23.0(b) of these Guides, and they may be made at the point of sale prior to sale; except that where a jewelry product can be purchased without personally viewing the product, (e.g., direct mail catalogs, online services, televised shopping programs) disclosure should be made in the solicitation for or description of the product.

[65 FR 78743, Dec. 15, 2000]

§23.23 Misuse of the words “ruby,” “sapphire,” “emerald,” “topaz,” “stone,” “birthstone,” “gemstone,” “gem,” “pearl,” “diamond,” “regional designation,” etc.

(a) It is unfair or deceptive to use the unqualified words “ruby,” “sapphire,” “emerald,” “topaz,” or the name of any other precious or semi-precious stone to describe any product that is not in fact a natural stone of the type described.

(b) It is unfair or deceptive to use the word “ruby,” “sapphire,” “emerald,” “topaz,” or the name of any other precious or semi-precious stone, or the word “stone,” “birthstone,” “gemstone,” or similar term to describe a laboratory-grown, laboratory-created, [manufacturer name]-created, synthetic, imitation, or simulated stone, unless such word or name is immediately preceded with equal conspicuousness by the word “laboratory-grown,” “laboratory-created,” “[manufacturer name]-created,” “synthetic,” or by the word “imitation” or “simulated,” so as to disclose clearly the nature of the product and the fact it is not a natural gemstone.

NOTE TO PARAGRAPH (h): The use of the word “faux” to describe a laboratory-created or imitation stone is not an adequate disclosure that the stone is not natural.

(c) It is unfair or deceptive to use the word “laboratory-grown,” “laboratory-created,” “[manufacturer name]-created,” or “synthetic” with the name of any natural stone to describe any industry product unless such industry product has essentially the same optical, physical, and chemical properties as the stone named.

(d) It is unfair or deceptive to use the terms like “Kashmir,” “Burma,” “Paraiba,” or any word, term, or phrase of like meaning to describe, identify, or refer to any industry product other than a gemstone taken from the region and of the distinctive appearance and type obtained from the region and recognized in the jewelry trade as a Kashmir gemstone.

§23.24 Misuse of the words “real,” “genuine,” “natural,” “precious,” etc.

It is unfair or deceptive to use the word “real,” “genuine,” “natural,” “precious,” “semi-precious,” or similar terms to describe any industry product that is manufactured or produced artificially.

~~§23.25 Misuse of the word “gem.”~~

~~(a) It is unfair or deceptive to use the word “gem” to describe, identify, or refer to a ruby, sapphire, emerald, topaz, or other industry product that does not possess the beauty, symmetry, rarity, and value necessary for qualification as a gem.~~

~~(b) It is unfair or deceptive to use the word “gem” to describe any laboratory-created industry product unless the product meets the requirements of paragraph (a) of this section and unless such word is immediately accompanied, with equal conspicuousness, by the word “laboratory-grown,” “laboratory-created,” or “[manufacturer-name]-created,” “synthetic,” or by some other word or phrase of like meaning, so as to clearly disclose that it is not a natural gem.~~

~~NOTE TO §23.25: In general, use of the word “gem” with respect to laboratory-created stones should be avoided since few laboratory-created stones possess the necessary qualifications to properly be termed “gems.” Imitation diamonds and other imitation stones should not be described as “gems.” Not all diamonds or natural stones, including those classified as precious stones, possess the necessary qualifications to be properly termed “gems.”~~

§23.26 Misuse of the words “flawless,” “perfect,” etc.

(a) It is unfair or deceptive to use the word “flawless” as a quality description of any gemstone that discloses blemishes, inclusions, or clarity faults of any sort when examined under a corrected magnifier at 10-power, with adequate illumination, by a person skilled in gemstone grading.

(b) It is unfair or deceptive to use the word “perfect” or any representation of similar meaning to describe any gemstone unless the gemstone meets the definition of “flawless” and is not of inferior color or make.

(c) It is unfair or deceptive to use the word “flawless,” “perfect,” or any representation of similar meaning to describe any imitation gemstone.

§23.11 Definition and misuse of the word “diamond.”

(a) A diamond is a natural mineral consisting essentially of pure carbon crystallized in the isometric system. It is found in many colors. Its hardness is 10; its specific gravity is approximately 3.52; and it has a refractive index of 2.42.

(b) It is unfair or deceptive to use the unqualified word “diamond” to describe or identify any object or product not meeting the requirements specified in the definition of diamond provided above, or which, though meeting such requirements, has not been symmetrically fashioned with at least seventeen (17) polished facets.

NOTE 1 TO PARAGRAPH (b): It is unfair or deceptive to represent, directly or by implication, that industrial grade diamonds or other non-jewelry quality diamonds are of jewelry quality.

(c) The following are examples of descriptions that are not considered unfair or deceptive:

(1) The use of the words “rough diamond” to describe or designate uncut or unfaceted objects or products satisfying the definition of diamond provided above; or

(2) The use of the word “diamond” to describe or designate objects or products satisfying the definition of diamond but which have not been symmetrically fashioned with at least seventeen (17) polished facets when in immediate conjunction with the word “diamond” there is either a disclosure of the number of facets and shape of the diamond or the name of a type of diamond that denotes shape and that usually has less than seventeen (17) facets (e.g., “rose diamond”).

NOTE 2 TO PARAGRAPH (C): Additional guidance about imitation **and or** **laboratory**-created diamond representations and misuse of words “gem,” “real,” “genuine,” “natural,” etc., are set forth in §§23.23, 23.24, and 23.25.

§23.12 Misuse of the words “flawless,” “perfect,” etc.

(a) It is unfair or deceptive to use the word “flawless” to describe any diamond that discloses flaws, cracks, inclusions, carbon spots, clouds, **internal lasering**, or other blemishes or imperfections of any sort when examined under a corrected magnifier at 10-power, with adequate illumination, by a person skilled in diamond grading.

§23.13 Disclosure of treatments to diamonds.

A diamond is a gemstone product. Treatments to diamonds should be disclosed in the manner prescribed in §23.22 of these guides, Disclosure of treatments to gemstones.

[65 FR 78743, Dec. 15, 2000]

§23.18 Definitions of various pearls.

As used in these guides, the terms set forth below have the following meanings:

(a) *Pearl*: A calcareous concretion consisting essentially of alternating concentric layers of carbonate of lime and organic material formed within the body of certain mollusks, the result of an abnormal secretory process caused by an irritation of the mantle of the mollusk following the intrusion of some foreign body inside the shell of the mollusk, or due to some abnormal physiological condition in the mollusk, neither of which has in any way been caused or induced by humans.

(b) *Cultured pearl*: The composite product created when a nucleus (usually a sphere of calcareous mollusk shell) planted by humans inside the shell or in the mantle of a mollusk is coated with nacre by the mollusk.

(c) *Imitation pearl*: A manufactured product composed of any material or materials that simulate in appearance a pearl or cultured pearl.

(d) *Seed pearl*: A small pearl, as defined in (a), that measures approximately two millimeters or less.

§23.19 Misuse of the word “pearl.”

(a) It is unfair or deceptive to use the unqualified word “pearl” or any other word or phrase of like meaning to describe, identify, or refer to any object or product that is not in fact a pearl, as defined in §23.18(a).

(b) It is unfair or deceptive to use the word “pearl” to describe, identify, or refer to a cultured pearl unless it is immediately preceded, with equal conspicuousness, by the word “cultured” or “cultivated,” or by some other word or phrase of like meaning, so as to indicate definitely and clearly that the product is not a pearl.

(c) It is unfair or deceptive to use the word “pearl” to describe, identify, or refer to an imitation pearl unless it is immediately preceded, with equal conspicuousness, by the word “artificial,” “imitation,” or “simulated,” or by some other word or phrase of like meaning, so as to indicate definitely and clearly that the product is not a pearl.

(d) It is unfair or deceptive to use the terms “faux pearl,” “fashion pearl,” “Mother of Pearl,” or any other such term to describe or qualify an imitation pearl product unless it is immediately preceded, with equal conspicuousness, by the word “artificial,” “imitation,” or “simulated,” or by some other word or phrase of like meaning, so as to indicate definitely and clearly that the product is not a pearl.

§23.21 Misrepresentation as to cultured pearls.

It is unfair or deceptive to misrepresent the manner in which cultured pearls are produced, the size of the nucleus artificially inserted in the mollusk and included in cultured pearls, the length of time that such products remained in the mollusk, the thickness of the nacre coating, the value and quality of cultured pearls as compared with the value and quality of pearls and imitation pearls, or any other material matter relating to the formation, structure, properties, characteristics, and qualities of cultured pearls.

The Commission proposes retaining Sections 23.22 (Disclosure of treatments to gemstones) and 23.24 (Misuse of the words “real,” “genuine,” “natural,” “precious,” etc.) without change.³⁵² Section 23.22 adequately addresses the commenter’s concern that all gemstone treatments either: (a) are not permanent; (b) create special care requirements; or (c) significantly affect a stone’s value. In any of these circumstances, the current Guides advise treatment disclosure because such information is material to a consumer’s purchasing decision.³⁵³ [FTC call p.96]

During the 1996 review, the Commission found that many consumers lacked detailed knowledge about the nature and types of treatments used to enhance gemstones. The Commission also found that consumers would expect gemstone purchases to retain their appearance over time regardless of any treatments and not to require special care to retain their appearance.³⁵⁴ The Commission therefore concluded that non-permanent treatments, or any treatments that create special care requirements, should be disclosed. At the time, the record did not demonstrate that a failure to disclose the special care requirements (as distinguished from simply disclosing that the stone had been treated) would be unfair or deceptive.³⁵⁵ The Commission explained that, because the Guides advise sellers to disclose treatments that create special care requirements, a consumer acting reasonably in the circumstances

could be expected to inquire about the process and its permanence, and thus learn about those requirements. However, the Commission added language recommending that sellers disclose the special care instructions because such treatments at the time were relatively new in the marketplace, and consumers might not have been as familiar with their requirements.³⁵⁶ Given the passage of time, the Commission asks questions to determine whether recommending that sellers disclose special care requirements, in addition to disclosing that the product has been treated and has special care requirements, is still necessary.”[FTC call p. 97]

During the 1996 review FTC “**found that many consumers lacked detailed knowledge about the nature and types of treatments used to enhance gemstones.**” Treatment disclosure that only focused on (a) and (b) during the 1996 review preceded the influx of technological breakthroughs (and happy accidents of mass treatment in several instances). Also just prior to 1996 the first big market changer of gueda sapphires invaded the market sold as natural and undisclosed. Gemologists and Labs scrambled to try and figure out how some much new material could enter the market unannounced. Still today this is a large source of new market stones and many sellers are clueless to it. Worse, then and now, Consumers didn’t/don’t actually know what they are buying and they pay high prices for such a privilege. After the FTC’s 1996 review, beryllium sapphires hit the market in the same way and still today consumers don’t know what they are buying and often they pay high prices.* Both of these treatments are described by Section 23.22(c) and mostly excluded by (a) and (b) so that many are disclosed but then many more are not. The Gueda sapphires that go undetected today make up a percentage of consumers purchased sapphires that if consumers ever do find out about their favorite ring they are going to know they were sold a worthless item compared to what they thought they were buying.

The majority of gemstones and cultured pearls are treated to improve the value of some feature of a stone for market, including diamonds and each category is important to maintain separately because both are historic gem types. The qualities of a gemstone are rarity, beauty, cut, and price; all of which are subjective and often market-profit driven with no thinking towards any of the provisions in Section 23.22(a)(b)(c). The vast majority of gemstones, including diamonds and pearls, are not natural and they are treated in one way or another for market share and eventual end-user ownership by consumers. By its nature treatment is a value adding process.

As industry products gemstones are treated for One Main Purpose and that purpose is described in **§23.22(c)** with the problem of word significantly and what is reasonable for consumers and sellers who are unprepared.

*[www.hunggemlab.com/index.php/news/news2/75-new2]

[<https://www.consumer.ftc.gov/articles/0295-gemstones-diamonds-pearls>]

<http://www.minerals.net/GemStoneVarieties.aspx>

<http://www.gemselect.com/other-info/gemstone-list.php>

<http://www.gemselect.com/other-info/paraiba-tourmaline-info.php>

<http://www.jckonline.com/2016/02/19/cibjo-blue-book-defines-paraiba>

<http://www.gemselect.com/other-info/andesine-mystery.php>

<https://www.gemobsessed.com/jewelry-trends/the-problem-with-pigeons-blood/>

Gem vs Gemstone: Terminology Is Synonymous

§23.23 Misuse of the words “ruby,” “sapphire,” “emerald,” “topaz,” “stone,” “birthstone,” “gemstone,” “gem,” “pearl,” “diamond,” etc.

(a) It is unfair or deceptive to use the unqualified words “ruby,” “sapphire,” “emerald,” “topaz,” or the name of any other precious or semi-precious stone to describe any product that is not in fact a natural stone of the type described.

(b) It is unfair or deceptive to use the word “ruby,” “sapphire,” “emerald,” “topaz,” or the name of any other precious or semi-precious stone, or the word “stone,” “birthstone,” “gemstone,” or similar term to describe a laboratory-grown, laboratory-created, [manufacturer name]-created, synthetic, imitation, or simulated stone, unless such word or name is immediately preceded with equal conspicuousness by the word “laboratory-grown,” “laboratory-created,” “[manufacturer name]-created,” “synthetic,” or by the word “imitation” or “simulated,” so as to disclose clearly the nature of the product and the fact it is not a natural gemstone.

NOTE TO PARAGRAPH (h): The use of the word “faux” to describe a laboratory-created or imitation stone is not an adequate disclosure that the stone is not natural.

(c) It is unfair or deceptive to use the word “laboratory-grown,” “laboratory-created,” “[manufacturer name]-created,” or “synthetic” with the name of any natural stone to describe any industry product unless such industry product has essentially the same optical, physical, and chemical properties as the stone named.

~~§23.25 Misuse of the word “gem.”~~

~~(a) It is unfair or deceptive to use the word “gem” to describe, identify, or refer to a ruby, sapphire, emerald, topaz, or other industry product that does not possess the beauty, symmetry, rarity, and value necessary for qualification as a gem.~~

~~(b) It is unfair or deceptive to use the word “gem” to describe any laboratory-created industry product unless the product meets the requirements of paragraph (a) of this section and unless such word is immediately accompanied, with equal conspicuousness, by the word “laboratory-grown,” “laboratory-created,” or “[manufacturer name]-created,” “synthetic,” or by some other word or phrase of like meaning, so as to clearly disclose that it is not a natural gem.~~

~~NOTE TO §23.25: In general, use of the word “gem” with respect to laboratory-created stones should be avoided since few laboratory-created stones possess the necessary qualifications to properly be termed “gems.” Imitation diamonds and other imitation stones should not be described as “gems.” Not all diamonds or natural stones, including those classified as precious stones, possess the necessary qualifications to be properly termed “gems.”~~

§23.20(j) Pearl

(j) It is unfair or deceptive to use the word “gem” to describe, identify, or refer to a pearl or cultured pearl that does not possess the beauty, symmetry, rarity, and value necessary for qualification as a gem.

NOTE TO PARAGRAPH (j): Use of the word “gem” with respect to cultured pearls should be avoided since few cultured pearls possess the necessary qualifications to properly be termed “gems.” Imitation pearls should not be described as “gems.”

Commission asks if consumers and trade see the terms gem and gemstone as synonymous. FTC proposes deletion of sections with gem references (§23.25 and §23.20(j)) and proposes to insert the term gem into the list of names under §23.23. As viewed in example above it appears that the extraneous language in section 23.25 and section 23.20(j) does not weaken TheGuide’s intent. Most reasonable consumers really only know what the industry shares with them and the industry’s use of gem and gemstone is absolutely interchangeable. Consumer perception is equal to Industry perception and both terms are used frequently in all aspects of industry and sales. Examples of interchangeable use for gem and gemstone in reference to pearls below and their use would not appear to cause consumer confusion or cause consumer injury.

[\[http://www.gia.edu/pearl\]](http://www.gia.edu/pearl)

[\[http://www.gemstone.org/index.php?option=com_content&view=article&id=141:sapphire&catid=1:gem-by-gem&Itemid=14\]](http://www.gemstone.org/index.php?option=com_content&view=article&id=141:sapphire&catid=1:gem-by-gem&Itemid=14)

Cultured Diamonds; Synthetic Claims; Flawless

§23.11 Definition and misuse of the word “diamond.”

(a) A diamond is a natural mineral consisting essentially of pure carbon crystallized in the isometric system. It is found in many colors. Its hardness is 10; its specific gravity is approximately 3.52; and it has a refractive index of 2.42.

(b) It is unfair or deceptive to use the unqualified word “diamond” to describe or identify any object or product not meeting the requirements specified in the definition of diamond provided above, ...

(c) The following are examples of descriptions that are not considered unfair or deceptive:

NOTE 2 TO PARAGRAPH (c): Additional guidance about imitation and laboratory-created diamond representations and misuse of words “gem,” “real,” “genuine,” “natural,” etc., are set forth in §§23.23, 23.24, and 23.25.

§23.23 Misuse of the words “ruby,” “sapphire,” “emerald,” “topaz,” “stone,” “birthstone,” “gemstone,” “gem,” “pearl,” “diamond,” etc.

(a) It is unfair or deceptive to use the unqualified words “ruby,” “sapphire,” “emerald,” “topaz,” or the name of any other precious or semi-precious stone to describe any product that is not in fact a natural stone of the type described.

(b) It is unfair or deceptive to use the word “ruby,” “sapphire,” “emerald,” “topaz,” or the name of any other precious or semi-precious stone, or the word “stone,” “birthstone,” “gemstone,” or similar term to describe a laboratory-grown, laboratory-created, [manufacturer name]-created, synthetic, imitation, or simulated stone, unless such word or name is immediately preceded with equal conspicuousness by the word “laboratory-grown,” “laboratory-created,” “[manufacturer name]-created,” “synthetic,” or by the word “imitation” or “simulated,” so as to disclose clearly the nature of the product and the fact it is not a natural gemstone.

NOTE TO PARAGRAPH (h): The use of the word “faux” to describe a laboratory-created or imitation stone is not an adequate disclosure that the stone is not natural.

(c) It is unfair or deceptive to use the word “laboratory-grown,” “laboratory-created,” “[manufacturer name]-created,” or “synthetic” with the name of any natural stone to describe any industry product unless such industry product has essentially the same optical, **physical**, and chemical properties as the stone named.

§23.24 Misuse of the words “real,” “genuine,” “natural,” “precious,” etc.

It is unfair or deceptive to use the word “real,” “genuine,” “natural,” “precious,” “semi-precious,” or similar terms to describe any industry product that is manufactured or produced artificially.

~~§23.25 Misuse of the word “gem.”~~

§23.18 Definitions of various pearls.

As used in these guides, the terms set forth below have the following meanings:

(a) *Pearl*: A calcareous concretion consisting essentially of alternating concentric layers of carbonate of lime and organic material formed within the body of certain mollusks, the result of an abnormal secretory process caused by an irritation of the mantle of the mollusk following the intrusion of some foreign body inside the shell of the mollusk, or due to some abnormal physiological condition in the mollusk, **neither of which has in any way been caused or induced by humans.**

(b) *Cultured pearl*: The composite product created when a nucleus (usually a sphere of calcareous mollusk shell) planted by humans inside the shell or in the mantle of a mollusk is **coated with nacre by the mollusk.**

(c) *Imitation pearl*: A manufactured product composed of any material or materials that simulate in appearance a pearl or cultured pearl.

No, cultured does not adequately describe this product and is not recommended if intent is to prevent deception. Consumer perception concerning lab-created stones likely has little to do with this longstanding campaign to adopt pearl terminology by some factors in the sector^[1]. The term and meaning of cultured is in direct conflict with proposal to incorporate the term into synthetic gemstone manufacturing. Laboratory created gemstones are not cultured they are manufactured, “caused and induced entirely by humans” however an argument can be made in favor of the proposal though it has no real bearing on today’s conditions. The situation long ago is unfortunate and hopefully not repeated again, but regardless, even if an attempt to right a wrong from the past is understandable the proposal today to add another word into an already lengthy string contradicts the definitions in Section 23.18(a)(b) is not helpful in preventing a false consumer perception today. Consumers, Sellers, , even reasonable ones, just want a relatively even playing field and are not interested much in nomenclature useless its something they’ve heard or been told about something admired in the market; like varietal or geographic names whose image connotes certain attributes. For example, adding cultured into the description of synthetic diamonds was called “word salad” by a person when asked to comment on the three examples above. Out of ten informal interviews conducted nine knew of or had heard of the man-made diamonds. Favorability for lab-created diamonds was high among them all while most still found a claim of natural diamond more attractive and more valuable. There may be indications that an age separation exists between the respondents. When asked “if money was no object” would they prefer to buy a top quality natural untreated diamond or a man-made created-cultured diamond of equal quality and size (i.e. identical in every way) those under 35 (#4) three said they would choose the lab created stone for ethical and ecological reasons. The remaining six (#6), over 35, two (#2) said they would choose the synthetic for similar reasons as the under 35 group and the other four (#4) said natural diamonds are unique and sentimental; a lifetime item.

Perhaps the better question concerning this proposal is how will consumers perceive and understand the “qualified” term of cultured across the rest of the lab-grown gemstone market? Does proposal to allow synthetic diamonds to market themselves as “qualified-cultured” now extend to other synthetic gemstones? If not, why not? What separates the mechanical manufacture of synthetic man-made diamonds from their counter-parts like ruby, sapphire, emerald, spinel, aquamarine, garnet, amethyst, alexandrite, opal, etc.? How does this proposal effect the use of the Words: Laboratory-Grown, Laboratory-Created, [Manufacturer Name]-Created, or Synthetic to qualify these other man-made gemstones? It may be that the most relevant consumer’s perception issue surrounding lab-grown diamonds is the longstanding confusion between the definition of synthetic (man-made) and simulant (imitation) as when consumers confuse and call the stimulant-synthetics cubic zirconia and moissanite a synthetic diamond.^[3] Deciding to add the term cultured for lab-created diamonds while disallowing to various degrees the levels of assistance industry members have requested in effort to build positive consumer perceptions for other areas of TheGuide can give the appearance/impression not wanted of an effort to help one segment of the industry with their perceived lack of consumer perception acceptance. The industry has multiple and serious product perception problems and that entail equally pressing issues with other terminology in the Gem and Jewelry industry. Cultured is just not an appropriate term for man-made diamonds and consumer perception study cited has very small

percentages to use and justify in the affirmative based on the likely overwhelming evidence to contrary. Perhaps a focused study on the current perceptions would help determine the actual perception better.

“The Commission says it declines to propose aligning the Guides with international standards that prohibit use of the term “cultured” to describe synthetic diamonds. Although the Commission strives to harmonize its guidance with international standards*whenever possible, such standards are not necessarily based on deception or unfairness. In contrast, the FTC Guides are based solely on deception. Therefore, to advise against any use of a term, the Commission would have to find that it would be deceptive under any circumstance. As discussed above, however, the consumer perception evidence demonstrates that the term “cultured diamond” can be effectively qualified.” So to repeat, whatever the original reasons were to deny the term cultured seventy years ago today is much different situation. FTC writes the rules in an effort to protect reasonable consumers and protect the market at a reasonable and equal measure. Too work and achieve a balance between the two forces. To that end the FTC depends on the consensus of the Trade Associations to promulgate the rules made. The Trade associations, foreign and domestic, are trying to help and set these common standards. The proof is in the fact that both the FTC and the Industry find it remarkable that TheGuides are so highly valued while most other industries have not seen it as so and their guides have been deleted one after one.

Most reasonable consumers have little to no knowledge of the industry or what they are buying past its appeal and, usually, cost. And this industry values TheGuides because from its beginning there are is a repeated history of a lot of deceptive deals done for profit, fame, and ignorance, on both sides of the aisle with low information sellers who really have no clue what they sell and reasonable consumers who don't have a chance to stay informed on these ongoing market developments. TheGuides set the baseline for everybody. Without TheGuides there would be no such thing as deception within the USA and the FTC will have failed its original charter and purpose adding another to the dustbin of history with the other promulgated Industry Guides.

Laboratory made diamonds are not like cultured pearls and Section 23.23(3) states the lab-created gemstones are physically identical to their natural counterparts. Laboratory-created gemstones are created using their own-type “seed” which is not like the insertion of a dissimilar bead or irritant that cores every cultured pearl; and this seed is also manufactured by the synthetic diamond producer; it is not a natural “seed.” Additionally, Cultured pearls do not physically replicate natural peals because the bead is not of the pearl and it comprises well over 90% of the whole while the initial diamond seed is not physically different; the “seed” is actually another synthetic diamond; and it is an extremely small synthetic diamond itself. Cultured in a definitional sense appears to be a deceptive use of accepted terminology for synthetic manufacture of gemstones. Consumers want to have confidence in the products they buy. The emerging market for this product has many strong indicators such that it is, and will be, openly accepted by certain segments of consumers with proper marketing. Most evidence suggests that the need for inclusion of cultured in description of Lab-grown diamonds is moot with unadvised consequences.

Man-made Diamonds have a huge market potential which if properly promoted (think “a diamond is forever” etc) will be tapped as their ability to mass produce increases. Man-made diamonds huge market potential also means a huge potential for consumer deception. The desire of a certain diamond manufacturer to lobby the US government for its use of the word cultured is confounding considering this materials obvious and well-built non-deceptive market attractions. Consumers and Industry would be best served to ensure things like the briefly accepted diamond lasering treatment which was not recognized as a gem clarity treatment but was instead seen as just another normal diamond inclusion under the definition of flawless. Laboratory created diamonds are Conflict free, Eco-friendly, and increasingly Sustainable.

Further, recent manufacturing developments of synthetic diamonds has created the ability to replicate the most desirable, valuable, and rare diamond type, Ila, which found in nature lacks impurities, has high clarity, and is white in color. Natural type Ila diamonds (treated or not) comprises only 2% of all mined diamonds worldwide; they are less than approximately one in a million.^{[4][5]} The ability of synthetic diamond manufacturers to now mass produce what nature cannot do often, i.e. manufacture mass produce Ila-type diamonds of flawless (FL and IF is coming while VVS to SI2 is reality) top color (colorless: D-clarity is coming and G-clarity is reality) diamonds, leaves a lot of room for market share expansion and potential consumer deception if the makers are not able to market the product on its own merits. These new CDV diamonds are sold at a cost (currently) of ~20-30% less than their natural treated diamond alternative and counter-part^[6]. In many ways the technological advances within the lab-created diamond sector is a win for consumers who accept the broader-reaching benefits that this sustainable industry product represents.^{[7][8]}

FTC proposes allowing synthetic diamond manufacturers to call this industry product “cultured” with qualification on behalf of a manufacturer request and against the recommendations of solid Industry Consensus. FTC says it basis this proposed ruling “to advise against the use of a term, the Commission would have to find that it would be deceptive under any circumstance.” [FTC Call p.110] and perhaps all Man-made Laboratory-created synthetic diamonds would all be best laser inscribed to avoid potential deception with their less prolific natural untreated diamond cousins. A request for manufacturers to laser their product prior to release will help prevent consumer deception all the way to the final sale. Because according to manufacturers of synthetic diamonds they are better than “real” ones of same composition. The request at this stage of the conversation is an end-run around the current well founded consumer protection regardless of how the term was denied at the beginning for these modern-era marketable synthetic gemstones.

^[1][\[www.professionaljeweler.com/archives/news/2004/111904story.html\]](http://www.professionaljeweler.com/archives/news/2004/111904story.html)

^[2][\[www.jckonline.com/2016/01/21/chatham-sounds-created-gems\]](http://www.jckonline.com/2016/01/21/chatham-sounds-created-gems)

^[3][\[www.jckonline.com/2016/02/19/everything-you-need-know-about-synthetic-and-simulant-diamonds\]](http://www.jckonline.com/2016/02/19/everything-you-need-know-about-synthetic-and-simulant-diamonds)

^[4][\[www.puregrowndiamonds.com/blog/just-our-type-2a-diamonds/\]](http://www.puregrowndiamonds.com/blog/just-our-type-2a-diamonds/)

^[5][\[https://www.puregrowndiamonds.com/blog/lab-grown-man-made-cultured-not-simulant-imitation-synthetic/\]](https://www.puregrowndiamonds.com/blog/lab-grown-man-made-cultured-not-simulant-imitation-synthetic/)

^[6][\[www.jewellermagazine.com/Article.aspx?id=3124\]](http://www.jewellermagazine.com/Article.aspx?id=3124)

^[7][\[http://2atechnologies.com/\]](http://2atechnologies.com/)

^[8][\[http://2atechnologies.com/2a-diamond-properties/\]](http://2atechnologies.com/2a-diamond-properties/)

*[\[http://www.gia.edu/gems-gemology/spring-2014-ulrika-hpht-synthetic-diamonds\]](http://www.gia.edu/gems-gemology/spring-2014-ulrika-hpht-synthetic-diamonds)

*[\[http://www.gia.edu/gems-gemology/spring-2016-labnotes-largest-blue-hpht-synthetic-diamond\]](http://www.gia.edu/gems-gemology/spring-2016-labnotes-largest-blue-hpht-synthetic-diamond)

*[\[http://www.marketwatch.com/story/jck-las-vegas---another-record-was-set-again-four-of-the-largest-lab-grown-diamonds-to-be-unveiled-by-new-diamond-technology-2016-05-26-102031947\]](http://www.marketwatch.com/story/jck-las-vegas---another-record-was-set-again-four-of-the-largest-lab-grown-diamonds-to-be-unveiled-by-new-diamond-technology-2016-05-26-102031947)

*[\[www.cibjo.org/download/DiamondCommissionReport.pdf\]](http://www.cibjo.org/download/DiamondCommissionReport.pdf)

*[\[www.cibjo.org/27-july-2015-cibjo-welcomes-publication-of-iso-international-standard-explicitly-stating-that-a-diamond-is-of-natural-origin/\]](http://www.cibjo.org/27-july-2015-cibjo-welcomes-publication-of-iso-international-standard-explicitly-stating-that-a-diamond-is-of-natural-origin/)