R07

Disclosure Guidance Consultation Response

Date: Consultation closed 19 September 2025

Respondent: Anonymous

Organisation's Role in Gold Supply Chain: Industry Association

---

Q1. What best describes your organisation's role in the gold supply chain?
Industry Association

Q2. Are you responding on behalf of an organisation?
Yes
If yes, please specify:
Anonymous

Q3. How clear are the proposed amendments to the Disclosure Guidance (DG3), including the new public disclosure requirements?
Very clear

Q4. Is the distinction between public disclosures (DG3) and confidential reporting to LBMA (RGG9) clear?
Yes

Q5. What operational or commercial impact do you anticipate from publicly disclosing the following?
No major impact expected

Q6. Do you anticipate any legal, reputational, or security risks in publicly disclosing the identity of local exporters and refiners in red-flag locations (as defined by OECD FN59)?
If yes, please describe the nature of the risk:
In some cases, this level of visibility might put producers at risk in terms of security

Q7. Do you foresee any technical or practical challenges in applying the OECD FN59 definition and lists (e.g. EU CAHRA, Dodd-Frank, AML lists) to determine red-flag locations?
There is some flexibility in defining what is red flag from one company to another

Q8. Is the proposed implementation date of 1 January 2026 for DG3 feasible for your organisation?
If no, what alternative timeline would you suggest?
N/A in our case

Q9. What support would help you meet the DG3 disclosure requirements effectively?

- Template for OECD FN59 disclosures
- Case studies or sample reports
- Clarification of definitions (e.g. 'local exporter', 'recyclable gold')
- Webinars or briefings

Other (please specify below):
Combination of different support activities / tools

Q10. Do you support LBMA's objective of increasing transparency for red-flag and high-risk sourcing locations?
Strongly support

Q11. Further comments or suggestions on the proposed disclosure amendments or their implementation:
No