BRITISH HALLMARKING COUNCIL
Established by Parliament to oversee hallmarking in the UK

Consumer and Competition Policy Directorate
Department for Business, Energy and Industrial Strategy

BY EMAIL

27 September 2021

Dear Sirs

Reforming Competition and Consumer Policy
The British Hallmarking Council's comments on the consultation

About the British Hallmarking Council

The British Hallmarking Council (BHC) supervises the hallmarking activities of the four Assay Offices in the UK to ensure there is adequate provision of hallmarking in the UK. It is an executive Non-Departmental Public Body established and governed by the Hallmarking Act 1973. Enforcement of hallmarking law is the responsibility of the Trading Standards Service and the BHC works with Trading Standards at national and local level to promote enforcement of hallmarking law.

The BHC's response to the consultation on Reforming Competition and Consumer Policy

The BHC's response relates to consumer law enforcement. The issues set out here relate most closely to Questions 74 and 75 of the White Paper but also cover wider issues of concern for consumer law enforcement.

1. Trading Standards resourcing
The BHC is extremely concerned about the progressive reduction in Trading Standards resourcing. The Trading Standards service is responsible for enforcement of hallmarking law, which is a vital protection for consumers. A purchase of jewellery may be one of the most expensive purchases a consumer makes and this area is subject to increasing levels of fraud and malpractice. The hallmark gives the consumer the necessary protection but this is only effective if there is adequate enforcement alongside the law. The Trading Standards Service needs to be appropriately resourced and co-ordinated to ensure its ability to protect consumers and the jewellery industry from criminal activity.

2. Online trading
The challenges to the jewellery industry and enforcement of hallmarking and general consumer law have been heightened by the rapid growth of digital markets, social media and structural changes following the UK's exit from the EU. We believe it is essential that

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Trading Standards officers have the powers to require that non-compliant material on the internet is taken down and cross border enforcement networks established to deal with serious consumer fraud.

3. Information for consumers
Information and advice for consumers to enable sound purchasing decisions is needed and must be visible and readily accessible.

4. Cross border transactions, particularly online
Consumers remain particularly vulnerable to non-compliant cross border transactions and a dedicated helpline should continue to be maintained to offer advice, guidance and support.

5. Information for business
Timely and accessible business information is crucial to ensure businesses remain compliant. We are impressed by the CTSI business companion service and would like to see that extended to hallmarking and the jewellery industry.

Yours faithfully

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