Line #	Status	Type	Comments by submitter	Proposed changes by submitter	Resolution by drafting team and ECE secretariat
1	Closed	ge	The recommendation provides a strong framework for transparency and sustainability but does not explicitly address the financial and economic impact on developing economies, particularly those reliant on exports. Many developing countries depend on raw material exports, and the increasing focus on sustainability standards could inadvertently create trade barriers. If compliance costs are too high, smaller economies may struggle to compete in global markets, leading to economic marginalization.	Include an assessment of the economic implications for developing countries, especially regarding compliance costs and potential trade barriers. Solution Example: Create a global grant program or support fund to assist developing nations in implementing new sustainability and transparency requirements. Regional development banks or global financial organizations like the World Bank could oversee this, guaranteeing that funding is accessible to lessen the strain of transition.	Amended to reflect comment. Language added to Recommendation a)
1	Closed	ge	The recommendation lacks a distinction between data (in claims and disclosures) that concern inherent properties of the product (i.e. what is IN the product, including potential contaminations) that can influence the further handing and impacts from the product, and extrinsic properties (such as origin, production methods, upstream sustainability impacts) that are NOT reflected in the product composition or properties and therefore cannot influence the further handing and impacts from the product. From this distinction, it should be obvious that the recommendation is only relevant for inherent properties. Without making this distinction very explicit, the recommendation may be misunderstood to be relevant also for extrinsic properties. Using the recommendation for extrinsic properties can lead to serious misinformation, e.g. misleading purchasers to make decisions based on extrinsic properties that are irrelevant because they cannot be influenced by the purchase.	Add a description of inherent and extrinsic product properties and a clear warning that the recommendation is not relevant for extrinsic product properties (see also comment for section 2.1.4.). See also suggestion from other comment:Replace the misleading text in column 1 whit a text along the lines of: "For value chain actors to invest in being more sustainable or more transparent, material incentives need to exist. This can be implemented in the form of contracts with buyers that are willing to pay a premium price for a product with better sustainability performance than the marginal market supply. Such contracts require mechanisms to guarantee that the improvements are real, that the claims are not made for a larger product volume than actually produced with better sustainability performance, and that the production volume is submitted to a public registry. For buyers, improvements can be made by shifting between products with different sustainability performance of their marginal market input (secondary data), or by shifting to suppliers of the same product with different performance, as documented by the above mechanism (primary data). For inherent properties that are not directly visible to the buyer, information tools that can trace the relevant product properties are relevant. For extrinsic properties, what is relevant is the market information or contractual guarantee that the desired improvement has happened or will happen, while traceability through the supply chain is not relevant."	Amended to reflect comment, with some modifications. These concepts are now addressed in Part II. Chapter I - Supporting Instrument Implementation Challenges; Part II, Chapter II.C Trust and Conformity Design Principles; and Part II, Chapter II.E Business Incentives Design Principles.
1	Closed	ge	The recommendation uses generic definition of DPP, which has the same name as ESPR defined DPP. The differences of the two are not visible anywhere and may create confusion	Could you clarify the differences and similarities of UNTP DPP and EU DPP?	Amended to reflect comment. Description of the (UN) DPP added in the Glossary.
2	Closed	te	Governance must ensure "one organization – one vote"	Add"- ensure that no single company or stakeholder group exercises undue influence"	Amended to reflect comment. Wording added in Part II, Chapter II.G Governance Design Principles recommending the use of a consensus based approach with a simple majority vote when consensus cannot be reached.
3	Closed	ge	UNTP uses GPL, mostly not acceptable for industrial companies to contribute.	Change to a permissive license with no copyleft.	UNTP has been moved to an Annex as one example of a supporting instrument.

12	Closed	ed	Transparency at Scale	<The title of the document is not comprehensive and engaging enough. I recommend to add one of the following subtitles>Transparency at Scale driving a circular economy; <Strictly transparency is about discoverability, accessibility, disclosures BUT the whole document is about trustworthy information to support purchase choices of customers and consumers to support a circular economy. Another suggestion>Transparency at Scale for reliable sustainability information. <As the Digital Product Passport as displayed in the scope section, it	Amended to reflect comment. Trasparency at scale: Fostering sustainable value chains.
56	Closed	ge	Shift the focus of the recommendations, from aiming at increasing the number of transactions, to increasing the quality and transparency of transactions.	Its principal focus is on facilitating sustainable national and international transactions, through the simplification and harmonization of supporting processes, procedures and information flows, ~~and so contribute to the growth of digital and sustainable global commerce.~~	Amended to reflect comment.
60	Closed	ed	Participation in UN/CEFACT is open to experts from United Nations Member States	Participation in UN/CEFACT is open to designated1 experts from United Nations Member States <Foot note to be added, background information see UNCEFACT ODP>1designated as an expert by a Head of Delegation of a Member State to UN/CEFACT.	No changes made. This is a standard paragraph (and the one above) that sits on all UN/CEFACT documents.
64	Closed	ed	and tools	and guidelines<tools might be interpreted as software>	Amended to reflect comment. Used the term instruments when not referring to software.
65	Closed	ed	and implemented globally	and globally implementable	No changes made, as the current wording captures the intended meaning.
79	Closed	ed	usable tools	usable instruments	Amended to reflect comment, replaced when relevant.
80	Closed	ed	collaboration	reuse	No changes made, collaboration is the intended meaning.
86	Closed	ed	deliverables	outputs	Amended to reflect comment. Replaced consistently deliverables with outputs, which refer to tangible results of projects/tasks.
89	Closed	ed	medium and smalle economic actors	medium and smalll sized economic actors	Amended to reflect comment, changed to: Small and medium-sized
109	Closed	ge	Suggest adding ", provenance" after " "Product sustainability"	Should be "Product sustainability claims, provenance and corporate sustainability disclosures form the basis for evaluation of progress against sustainability targets."	No changes made but the concpet of provenance has been added elsewhere in the document.
109	Closed	ed		Sustainability information forms the basis<Claims are about sustainability information, likewise sustainability disclosures (which is strictly about transparency)>	Amended to reflect comment. Sustainability information has been more clearly defined in the document.
110	Closed	ed	Therefore,, if the trustworthiness of suchclaims and disclosures cannot be relied upon	Therefore, if the trustworthiness of sustainability information cannot be relied upon<Aligns with suggestion for 109. The introduction should go yet into claims and corporate disclosures>	Amended to reflect comment.
110	Closed	ed	",,"	Delete one ","	Amended to reflect comment.
110	Closed	ed	Consider rephrasing this sentence to emphasize the value of trustworthy claims and disclosures in supporting meaningful progress, rather than focusing on the negative consequences of unreliable information.	Therefore, ensuring the reliability and quality of such claims and disclosures is essential to accurately track progress and reward effective sustainability practices.	Amended to reflect comment.
113	Closed	ed	policy action	add foot note for policy action for examples: e.g. The Netherlands Authority for Consumers and Markets (ACM), The European Union Green Claims Directive (GCD), United States Environmental Protection Agency (EPA) Scientific Integrity Policy.	Amended to reflect comment.

114	Closed	te	verifiable integrity" is ambiguous: do you mean the correctness of in the claims, or the integrity of the submitted dataset?	Remove or provide explanation	Amended to reflect comment and removed.
114	Closed/Duplicate	te	"verifiable integrity" is ambiguous: do you mean the correctness of in the claims, or the integrity of the submitted dataset?	Remove or provide explanation	Addressed, duplication from another contributor.
126	Closed	ed	' at the end of the sentence is not necessary		Amended to reflect comment.
132	Closed	ge	Include Multilateral Environmental Agreements (MEAs) in the list of relevant international and regional policies and legal instruments, especially the Basel Convention.	and the OECD/Food and Agriculture Organization 141 (FAO) Guidance for Responsible Agricultural Supply Chains, Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal; and the UNECE Convention on	Amended to reflect comment, reference added.
133	Closed	te	What is meant by "regional policies"? The term is ambiguous but I am no technical expert. If this represents, trade blocks such as European Union, this should be made clearer.	Suggest adding footnote to a definition such as "Regional policy is defined as a policy derived and enforced via a supranational governance authority, such as but not exclusive to the European Union, that has jurisdiction to enter into agreements on the matters at hand."	Amended to reflect comment. The term was defined in the Glossary of Terms as it appears multiple times.
139	Closed	ge	Missing reference to OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.	Delete all references to OECD sector-specific guidance as their content is covered by the reference to the OECD MNE Guidelines (recommended), or add reference to OECD Minerals Guidance.	Amended to reflect comment, reference added.
144	Closed	ed	A footnote should be added to the UNECE convention as there is a footnote for every other convention		Amended to reflect comment, reference added.
145	Closed	ge	Reference to global policymakers missing	Consider adding reference to international organizations and global standard setters for which the recommendation is of equal relevance.	Change made to reflect the comment.
147	Closed	ge	none	Replace with:"I. Legislate the level of sustainability of their economies' products through greater…"	No changes made. This is a voluntary instrument, so a softer language is more appropriate. The Recommendation does not provide guidance how to write a laws and/or legislate. It recognizes that legislation could be one of the approaches that a policy maker uses to create an enabling environment for adoption.
147	Closed	ge	The recommendation focuses exclusively on products, while sustainability requirements are increasingly also being defined for services (e.g. the responsible use of AI).	Consider referring to products and services throughout.	Amended to reflect comment. Services are relevant and added it to the Glossary (Sustainability Claim)

147	Closed	ed	Consider a more inclusive and targeted language for the objective I. 'Demonstrate the increase sustainability' might speak more to a private sector audience than to policymakers.	~~Demonstrate the increased sustainability of their economies' products~~ Strengthen national economies and promote international sustainable trade through greater transparency…	Amended to reflect comment.
152	Closed	ge	Due diligence needs to be defined to mean human rights and environmental due diligence.	Add" to address human rights and environmental impacts" behind "risk-based due diligence". Add "global" between "value" and "chain".	Amended to reflect comment.
154	Closed	ge	*'for law abiding actors'* redundant?	EB: Replace with: "III. Create a legislative level playing field."	The term "law abiding" has been removed.
154	Closed	ed	The phrase "law abiding actors" is not commonly used in this type of instrument as a standardized or widely accepted term. Consider other alternatives, such as the suggested change.	Create a level playing field for ~~law abiding~~ compliant actors.	Amended to reflect comment.
155	Closed	ge	Point IV implies that traceability could reduce TBTs. This would need to be substantiated.	Rephrase or delete.	Amended to reflect comment. TBTs are technical barriers to trade. Reference moved to footnote.
156	Closed	ge	BH: The reference to 'increasing technical barriers to trade due to product sustainability concerns' represents an assumption (not justified by any of the preceding text?)	EB: Replace with:"…in their countries, in the context of product sustainability concerns."	Amended to reflect comment.
156	Closed	ed	for products produced in their countries	for products domestically produced<better readability>	No changes made. Conflicts with another comment.
159	Closed	ge	none	EB: Replace with:"…conformity of products with national or foreign sustainability requirements	Amended to reflect comment.
159	Closed	ge	Excludes reference to global standards, UN conventions or LBIs.	Add "or global" before sustainability requirements	No changes made. The target of the recommendation is explicitly national and regional policy makers.
165	Closed	ed	Instead of "Sustainable Practices" change to "disclosure practices"		Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
167	Closed	ed	Suggested rephrasing for "implementation of sustainability".	Replace sustainability by "sustainable production and consumption practices"	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
169	Closed	te	"cryptographically verifiable sustainability information" is technically not possible: how could an information provided by an economic actor be "cryptographically verified"? You can only verify it by analyzing the product.	"…that include digital sustainability information that uses unambiguous terminology"	Amended to reflect comment.In response to multiple comments on this Chapter, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.

169	Closed/Duplicate	te	"cryptographically verifiable sustainability information" is technically not possible: how could an information provided by an economic actor be "cryptographically verified"? You can only verify it by analyzing the product.	"…that include digital sustainability information that uses unambiguous terminology"	Amended to reflect comment.In response to multiple comments on this Chapter, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
169	Closed	ed	Decrease the jargon to increase accessibility.	Products are accompanied by digital product passports that include digital, ~~cryptographically~~ verifiable sustainability information that uses unambiguous terminology.	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
171	Closed	ed	"These product passports are easily accessible…"		Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
171	Closed/Duplicate	ed	Retrievable should be replaced with accessible	"These product passports are easily accessible…"	Amended to reflect comment.In response to multiple comments on this Chapter, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
171	Closed	ed	Points II and VIII means the same.	Consolidate in one point.	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Chapter 1.2.4 A Vision for the Future.
172	Closed	te	Remove after "e.g."		Amended to reflect comment with some modifications. In response to multiple comments on this section, we have updated the language to Chapter 1.2.4 A Vision for the Future.
172	Closed/Duplicate	te	Login in to a system should be a possibility	Remove after "e.g."	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
173	Closed	ed	'is' should be replaced by 'are'		Amended to reflect comment.
173	Closed	te	Remove clause III.		Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
173	Closed/Duplicate	te	It is not explained why green washing or asocial washing is "rare" due to easier detection, see 169	Remove clause III.	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.

174	Closed	te	IV. is an unproved claim	Remove clause IV.	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
174	Closed/Duplicate	te	IV. is an unproved claim	Remove clause IV.	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
175	Closed	te	V. is an unproved claim	Remove clause V.	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
175	Closed/Duplicate	te	V. is an unproved claim	Remove clause V.	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
178	Closed	ed	and data	and product information	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
178	Closed	ge	Consider elaborating further on data point or add a separate one on data (please see the proposed text in proposed changes).	Trusted and interoperable data on product sustainability improves understanding of environmental pressures, enables stronger connections between environmental, social, and economic data ecosystems, and supports a more holistic approach to addressing complex sustainability challenges.	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
182	Closed	te	Verification is not possible, but customers can inform themselves with the information	"…stakeholders can get informed about a product's sustainability claims with a single click"	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.

182	Closed/Duplicate	te	Verification is not possible, but customers can inform themselves with the information	"…stakeholders can get informed about a product's sustainability claims with a single click"	Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
184	Closed	ge	Consider a more inclusive and targeted language for the objective I. 'Demonstrate the increase sustainability' might speak more to a private sector audience than to policymakers.	The purpose of Recommendation No. 49 is to help national and regional policy makers 184 ~~demonstrate the improved sustainability of their economies~~ strengthen national economies and promote international sustainable trade	Amended to reflect comment, language changed.
185	Closed	ge	none	EB: Replace with:"…legislate the level of sustainability of their economies in those areas related to the…"	No changes made. Recommendation No. 49 is voluntary.
188	Closed	ge	Include interoperability and accessibility	It aims to do so by helping make the sustainability information about products complete, trustworthy, ~~and~~ comparable, interoperable, and accessible.	Amended to reflect comment, language changed.
189	Closed	ed	for the quality of their data	delete, redundant	Amended to reflect comment, language changed.
189	Closed	ge	Consider being more specific when talking about data quality. "More accountable" sounds abstract. Please check UNEP's Global Environmental Data Strategy framework	At the same time, it supports information providers—such as those developing digital product passports—in adopting best data governance practices to enhance accountability for data quality.	Amended to reflect comment with some modifications.
190	Closed	ed	looks to support	aims to support (more formal)	Amended to reflect comment.
191	Closed	ed	Cost and complexity of what?	Add "of sustainability data exchange" behind "cost and complexity".	Amended to reflect comment.
191	Closed	ge	Not only laws and regulations, and not only sustainability reporting is of relevance here.	Rephrase into: "facilitating their ability to conform with voluntary and mandatory sustainability requirements."	Amended to reflect comment with some modifications.
192	Closed	ge	Another paragraph is suggested between line 192-193	"It also aims to facilitate the monitoring of non-market actors and their intervention in supply chains, by improving provenance transparency across value chains."	Amended to reflect comment.
194	Closed	ge	Include mention of the fact that raw material can be virgin or recycled	transparency regarding sustainability in global value chains from the origin of raw materials (virgin or recycled) to finished products, to …	Amended to reflect comment.
195	Closed	ed	and reintegration of materials into new value chains.	and reintegration of materials into new value chains.and the reintegration of materials into either the same or new value chains.	Amended to reflect comment.
199	Closed	ed	the resulting patchwork of sustainability requirements	the resulting abundance of sustainability requirements	No changes mande. Suggested to keep as it may be easier to understand for non-native speakers and is commonly used term in the UN system.
201	Closed	ed	It's companies, not countries, that trade	Add "producers from" before low-income countries.	Amended to reflect comment, with some additional language.
201	Closed	ge	The risk of reduced participation is not only related to SMEs or companies in developing countries. I suggest adding 'including'…	[…] and the related costs for multiple conformity processes and systems, risks reducing the participation of many, including SMEs and low-income countries in global markets	Amended to reflect comment, added.
204	Closed	ed	it looks to ensure	it aims to ensure	Amended to reflect comment.

204	Closed	ge	The challenge of implementation is not only related to SMEs or companies in developing countries. I suggest adding 'including'…	by many, including SMEs and low-income countries.	Amended to reflect comment, added.
210	Closed	ge	scope	<The document is balancing between sustainability claims, verifiable credentials, digital product passports, sustainability information, corporate disclosures. It does not make it clear that sustainability information, in whatever form, must be offered as a verifiable credential. The four "vehicles" for carrying sustainability information are: DPP (Digital Product Passport)DCC (Digital Conformity Credential)DTE (Digital Traceability Event)DFR (Digital Facility Record) In the Scope section, Fig. 1.3.1, Scope of Recommendation No. 49, focuses on DPPs and traceability logs as the 'vehicles' for sustainability information. Strictly speaking, 'Transparency at scale' depends on the availability of discoverable and linkable data. Trustworthy data, obtained through verifiable credentials, is an important byproduct—but not the primary driver. In other words, transparency and trustworthiness are distinct concepts. Not all actors in the ecosystem can provide data as verifiable credentials, but this capability is expected to grow over time. If this distinction is correct, it should be made clearer.	Amended to reflect this comments and several other comments related to this section.
212	Closed	ed	Add at the end "at all levels of the value chain with those who need/ have the right to know"		Amended to reflect comment.
215	Closed	ed	to reach sustainability objectives	to fulfill industry and regulatory requirements	Amended to reflect comment. Included definition of sustainability requirements.
215	Closed	ge	sustainability information – what does that mean?	Include a definition	Amended to reflect comments. Definition added.
216	Closed	te	Qualify better statements below, by adding some additional text. Transparency at scale: Having sustainability information accessible across different jurisdictions, industries, product segments, and steps in the value chain to reach sustainability objectives.	Transparency at scale: Having sustainability information accessible across different jurisdictions, industries, product segments, and steps in the value chain to reach sustainability objectives, while safeguarding business confidentiality and adopting a "one-up one-down" principle in data visibility.	Amended to reflect comments, with some modifications.
217	Closed	te	Whose "objectives" is this referring to? Requires clarification.	Propose something along the lines of "objectives of governments or regional entities."	Amended to reflect comment with some modifications.
218	Closed	te	Replace reference in footnote 10 by more authoritative source	Consider referencing the definition of Circular Economy used in the EU's Circular Economy Action Plan, or in the OECD MNE Guidelines (Chapter 3, point 73, pp 36-37).	Amended to reflect comment, reference replaced.
218	Closed	ge	"Circularity economic model" definition. Is Circular Business Model meant	Include a definition and may be an example, e.g. life-cycle extension pattern	Amended to reflect comments. Models was removed as it is misleading.

218	Closed	ge	Please replace the reference to Circular Economy (currently from Wikipedia) to refer to UNEP language or EMF . Main point being that in the current definition the focus of circularity seems to be recycling. This can be misleading. In fact and I quote from the source below: Circularity is built on the overall guiding principle of ''Reduce by design''. Applied from the earliest stages of design of products and services, "Reduce by design" aims to reduce the amount of material, particularly raw material consumed during production and/or during use. Circularity builds upon value retention loops, as follows: • ''User-to-user'' value retention processes, where a product or component remains close to its user and function [Refuse, Reduce and Re-use] • ''User-to-business'' value retention processes, where a product or component is upgraded and producers involved again [Repair, Refurbish and Remanufacture] • ''Business-to-business'' value retention processes, where a product or component loses its original function [Repurpose and Recycle] Source: https://www.oneplanetnetwork.org/sites/default/files/from-crm/enhancing_ndcs_thru_circ_economy.pdf	Other relevant sources: UNEP Circularity Platform: Circularity | UNEP - UN Environment Programme (https://www.unep.org/circularity) EMF: What is a circular economy? | Ellen MacArthur Foundation (https://www.ellenmacarthurfoundation.org/topics/circular-economy-introduction/overview)	Amended to reflect comment. The definition follows the one of the European Parliament. It has been replaced with the following one (from UNEP). The Circular Economy is one of the current sustainable economic models, in which products and materials are designed in such a way that they can be reused, remanufactured, recycled or recovered and thus maintained in the economy for as long as possible, along with the resources of which they are made. In such a model generation of waste, especially hazardous waste, is avoided or minimized, and greenhouse gas emissions are prevented or reduced (From UNEP LEAP).
221	Closed	te/le	…"visibility of the entire value chain…" is inacceptable as such information discloses trade secrets. Moreover, it is still debated whether supply chain disclosure is permissible from a competitive law perspective as this may influence market behavior. Additionally, the visibility would contradict the following line 223 requirement of data sovereignty.	Strengthening the resistance of value chain processes to disruptions by ensuring a clear understanding of risks and performance attributes of the entire value chain.	Agreed. Langauge has been removed and updated throughout the document to reflect the issue raised by the commenter.
221	Closed	ge	"Strengthening the resistance of value chain processes to disruptions" transparency is not a resilience instrument. Resilience is strengthened in the prepare phase. The sustainability data as focussed in Rec. 49 will not help for resilience.	Would delete, because it is not in the focus	Removed to reflect comments.
227	Closed	ed	with the help of security technology (verifiable credentials) and	with the help of multiple security techniques such as used by verifiable credentials and <verifiable credentials are not per se a security technology, it uses security mechanisms>	Amended to reflect comment, with some modifications. Based on multiple related comments, we have removed any references to specific technologies, such as verifiable credentials, from the Recommendation, and instead focused on concepts and principles for supporting intruments.

227	Closed	ge	Not limit security technology to 'verifiable credentials'	of security technology (including verifiable credentials) and the	Amended to reflect comment, with some modifications. Based on multiple related comments, we have removed any references to specific technologies, such as verifiable credentials, from the Recommendation, and instead focused on concepts and principles for supporting intruments.
230	Closed	ed	Ad-hoc data discovery:Facilitating the ad-hoc discovery of product and company sustainability information related to claims and disclosures.	Ad-hoc data discovery: Facilitating the ad-hoc discovery of product and company sustainability information.< related to claims and disclosures is not relevant for this definition, it unnecessarily restricts its scope.>	Amended to reflect comment, with some modifications.
233	Closed	ge	In addition to having Figure 1.3.1 illustrating the scope of Recommendation No. 49, it would be good to include a narrative recap of the scope that the recommendation will cover. It is clear what the recommendation will NOT cover, less so for what it will cover.	Include narrative explanation of Figure 1.3.1 to facilitate understanding of the scope of the Recommendation.	Based on multiple comments, Figure 1 has been updated to better reflect the scope of Recommendation 49. Tables 1 and 2 describe what is in and out of scope.
234	Closed	te	The purpose of supporting instruments with which verifiable sustainability information is issued, discovered, and exchanged by different actors along the value chain should not be limited to facilitating the circular economy and value chain resilience.	Add "…and promote sustainable consumption and production practices" behind "…resilience".	Based on multiple comments, the concept of supporting instruments has been moved to Part II, which includes a description of their purpose, challenges and design principles.
234	Closed	ed	In Figure 1.3.1 in addition to Data Issuance, it's important to add data provenance	Data Issuance and Provenance (Fig. 13.1)	Amended to reflect comment with some modifications. Figure 1 has been updated to reflect various comments
236	Closed	ed	Replace the word 'passport' with 'information'	This allows users to discover digital product information and recyclers to access material compositions	Language has been updated based on multiple related comments.
238	Closed	ed	ofthe owner, data quality and soverignty is ensured	of the owner, data quality and soverignty are ensured	Language has been updated based on multiple related comments.
239	Closed	ed	'is' should be replaced by 'are'		Amended to reflect comment.In response to multiple comments on this section, we have updated the language to Part I, Chapter I.A.4 Envisioning a future of transparency and accountability.
241	Closed	ge	Fig 1.3.1 Specific concepts are listed here. Other possibilities are excluded, and openness and neutrality are ignored.	We request a revision of the framework. Specific methods and principles must be removed. It must be shown that approaches can and must work alongside and with each other.	Amended to reflect comments. We have updated the diagram to address the comments. Language has been added throughout to reflect the compatibility of centralized, federated and decentralized systems, and the need to bridge between them to achieve interoperability and global scaling of data exchange. References to specfic technologies have been removed, and replaced with design principles.

241	Closed	ge	He framework picture is the first step. But it is dictating specific concepts which would lead to immense adaptation of other existing business networks: -Having for each step a passport – leads to unnecessary cost -Having a wallet-oriented principle for data collection instead of allowing other ones – like company or community oriented centralized data management systems -Government centric approach instead of using existing decentralized national quality infrastructure -Event driven traceability is too narrow for other existing approaches By-ship-pay approach supports just company to company interaction. Sustainability tracking needs other approaches to.	Revise the framework, by taking out specific methods and principles, show coexistence of approaches, integrate concepts and instruments of typical quality infrastructure systems	Amended to reflect comments. We have updated the diagram to address the comments. Language has been added throughout to reflect the compatibility of centralized, federated and decentralized systems, and the need to bridge between them to achieve interoperability and global scaling of data exchange. References to specfic technologies have been removed, and replaced with design principles.
242	Closed	te	Fig. 1.3.1 Scope of Recommendation No. 49	Fig. 1.3.1: Missing: final product manufacturer, AEO does not have a definition and/or roles, please add in text and/or Annex., Align with actors on line 613, see comment on 613 too.	Amended to reflect comment.
243	Closed	te	recommendation should be industry and vendor agnostic, the following aspects are not within the scope of Recommendation No. 49 and its supporting instruments:	<Confusing with statement on line 248, The stated scope includes allowing the use of any relevant data carrier scheme related to Recommendation No. 49. However, since 'data carriers' are not within the scope of Recommendation No. 49 at all, this text is redundant.>	Amended to reflect comment.
245	Closed	te	This could be misunderstood to mean data exchange with consumers is outside the scope of Rec.49, while it should support B2C DPPs and the verification of sustainability claims by consumers	Delete or limit to technology for better customer experience	Amended to reflect comment. Language deleted.
245	Closed	te	Involvement of customer is crucial for sustainability and in particular for circularity. Standardise interface to customer is a key here	Integrate Customer perspective	Amended to reflect comment. Language deleted.
247	Closed	te	The mention of specific technologies contradicts the required technological openness and neutrality.	The mention of specific technologies must be removed everywhere. In particular, other technologies exist and are excluded by a conclusive list. Furthermore, future developments are prevented and excluded.	Amended to reflect comment.
247	Closed	te	Why data carriers are out, what is the rational.	Explain the reason, why it is out of scope.	Amended to reflect comments, text added for clarity.
247	Closed	te	Even data carriers are out of scope there are mentioned several times in the document, e.g. in line 669	Try to be consistent, keep out, then not mentioning this in other chapters	Amended to reflect comments. Removed the list in 669.
247	Closed	te	RAIN is a specific technology, even it has a standardisation slot in ISO. Even taking this an example to have a better illustration of the topic, this is problematic from the perspective of technology openness. All technologies which are directly connected to identification and management are highly sensitive. Just mentioning provides a not acceptable advertising which has to be sorted out from those kind of documents	Remove those mentioning of specific technologies in all cases. Especially when there exist others in parallel.	Amended to reflect comments. Language has been added throughout to reflect the compatibility of centralized, federated and decentralized systems, and the need to bridge between them to achieve interoperability and global scaling of data exchange. References to specfic technologies have been removed, and replaced with design principles.
251	Closed	ed	the verification of (open source) software implementations of the instruments covered by this recommendation	the (open source) software implementation verification related to the instruments covered by this recommendation	Amended to reflect comment with some modifications
251	Closed	te	Why there are still software development issues in the rec 49	All software technologies should be kept out of the Rec. 49	Amended to reflect comments. References to any specific software has been removed.
252	Closed	ed	Software development: Except for core definitions and the verification of (open source) software implementations of the instruments covered by this recommendation.	Software development: Except for data definitions and the verification of (open source) software implementations of the instruments covered by this recommendation.	Langauge has been updated for clarity.

254	Closed	ge	Industry-specific vocabulary. To exempt industry-, authority- or regulation- specific vocabularies from the scope the Rec 49 risks to jeopardize its ambition for setting interoperability across supply chains integrating different economic actors.	Proposal: Either integrate cross-sectoral semantics and its governance following the example of Core Component Library (CCL) and Buy-Ship-Pay (BSP) or delete this paragraph.	Amended to reflect comment, text changed and BSP reference added.
255	Closed	te	Since industry extensions to the UNTP are envisioned and already been developed (for agri-food and CRM), it seems like an undue restriction to limit the provision of industry-specific terminologies and data requirements to the industries or to national and regional policy makers.	Add language to refer to the possibility for industry-specific extensions to the core UNTP.	Based on multiple comments, all references to UNTP have been moved to an Annex as an example of a supporting instrument that aligns with design principles in Part II.
257	Closed	ge	….was defined by the battery industry and many relevant stakeholders…. incorrect statement	….was defined by the research consortium "Battery Pass"* (thebatterypass.eu) and many other stakeholders under the governance of DIN/DKE, footnote *This project received funding from the German Federal Ministry for Economic Affairs and Climate Action by resolution of the German Bundestag under grant agreement No 16BZF335.	Amended to reflect comment.
259	Closed	ed		between "the" and "vocabulary" delete the double space	Amended to reflect comments.
266	Closed	ed	Add the following sentence (or similar) to link the objective of implementing Rec 49, to the increased availability of reliable data for science-based decision making. "[…]by increasing the availability of data to drive responsible and sustainable decisions.	The implementation of Recommendation No. 49 and its supporting instruments by national and regional policymakers around the globe has the potential to directly benefit multiple value chain actors in sectors that are critical for the green and digital transformation, by increasing the availability of data to drive responsible and sustainable decisions.	Amended to reflect comment. See Part I, Chapter I.C, Table 3.
269	Closed	te	This list misses main CE stakeholders like repairers, sorters, refurbishers,…		Amended to reflect comment.
269	Closed	ed	any other stakeholders reliant on trustworthy product information.	any other stakeholders <extra part is one of the instruments: redundant>	Partly amended to reflect comment.
271	Closed	ge	The benefits from implementing the recommendation actually represent the benefits of implementing the UNTP, without naming it. It is unclear why the UNTP is first mentioned only at the level of the actual recommendations (Section 1.6, recommendation b) and explained only at the very end of the document (Section 2.4).	Consider presenting (or at least referencing) the UNTP in the Introduction (Section 1.1) as the instrument developed by UN/CEFACT to support Rec. 49 and achieve transparency at scale.	Amended to reflect comment with some modifications. In response to multiple comments, the section on UNTP has been moved to an Annex where it is described as one potential supporting instrument.
273	Closed	ge	Share digital, reliable, high-integrity data. The first step is to digitize the data/Information in a machine readable and understandable representation based on a set of harmonized and horizontal semantic representation. The supporting instruments do not provide a clear instruction how to get there.	Provide a paragraph how to generate machine readable and understandable representation of physical products based on 1) ID, 2) Data Carrier, 3) semantics, and 4) interoperability facets according to ISO 19941:2017	Amended to reflect comment, and clarifications made, but those concepts are described in Part II, Chapter II.

273	Closed	ge	There is additional benefit arising from delivering transparent conformity outcomes in the form of trade facilitation and the reduction of technical barriers to trade, as noted in the UN/CEFACT DPCCE BRS: "The WTO TBT Agreement6 provides a framework for the acceptance in an importing economy of the results of conformity assessment procedures arising in an exporting economy. The basis of acceptance is that the importing economy is satisfied that assurance of conformity with applicable technical regulations or standards is equivalent to that achieved by the importing economy's own procedures (Article 6.1)…Additional guidance may be found in the supporting document WTO G/TBT/547. 6 https://www.wto.org/english/docs_e/legal_e/17-tbt_e.htm 7 WTO G/TBT/54 Guidelines on Conformity Assessment Procedures, 19 March 2024	Reference WTO TBT Agreement in the context of listing benefits arising from transparent conformity outcomes (namely, trade facilitation and the reduction of technical barriers to trade)	Amended to reflect multiple comments on this section of the document.
273	Closed	ge	Stress the importance of harmonized terminology to promote the benefit of globally comparable information	"Share digital, reliable, high-integrity data with clear and comparable terminology"	Amended to reflect multiple comments on this section of the document.
273	Closed	ed	It would be helpful to have consistency in the data language across the document. In 3 different parts where data is mentioned, different data characteristics are used: -Page 8 (187-188): data is complete, trustworthy, and comparable -Page 9: data transparency, sovereignty, discoverability and traceability -Page 11: data is digital, reliable, high-integrity with clear terminology All these points are important for data, but some of them are duplicative and they are not clearly defined.	It would be helpful to see what exact characteristics you are looking at when you talk about data improvements. For the Global environmental data strategy, we focused on the following areas: – Data governance encompasses the overarching framework of policies, institutions, principles and practices that define how environmental data is collected, shared and used. This includes measures to ensure fair, ethical and secure data management. – Data quality and provenance addresses the tools and approaches needed to ensure that the global environmental data ecosystem produces sufficient good quality data to meet the needs of governments, businesses and other stakeholders. – Interoperability focuses on ensuring that environmental data from different sources can be easily integrated, compared and used across locations and institutions. This includes harmonizing data formats, protocols and standards, balancing standardization with flexibility. – Accessibility and affordability addresses the financial, technical and institutional barriers that prevent stakeholders from finding, accessing and using environmental data. This includes navigating concerns about sensitive data and developing open, user-oriented platforms. – Capacity-building focuses on the need to strengthen infrastructure, expertise and institutional frameworks to ensure that all stakeholders, including in low-income countries, can	Amended to reflect multiple comments on this section of the document.
276	Closed	ed	Use of the term sector and industry, such as in:industry-specific vocabularies	<term sector and industry are used throughout the document. A sector may include different industries. Please check the document on correct usage of sector and/or industry.>	Amended to reflect comment. The term "industry-sector" has been adopted throughout the document.

277	Closed	ge	Increase trust of supply chain actors. The information captured by the claims is not trust worthier by verifiable claims than with other concepts. The key challenge is to ensure that the original data represents the reality accurately	Add paragraph how to record accurate information first, then talk about verification.	Amended to reflect multiple comments on this section of the document.
279	Closed	te	Item 1 is confusing. To my knowledge, in practice, supply chain problems don't arise from 'claims' being altered but by the substantiating certificates being altered. I stand by my comment in a previous submission that Section 1.4.2 seems to mix up two different concepts: that is, the 'claim about a product' vs the 'evidence substantiating a claim' (such as certificates).	1. Reword such that it is clear what we actually mean by verifying a claim, eg: Verify claim integrity: by ensuring that claims are substantiated by reliable and verifiable evidence. 2. We should also be concerned by the certificates used to substantiate a claim are not misrepresented or altered, so there should be an additional item: Verify evidence provided in support of claims: by establishing that any certificates provided in support of claims can be reliably linked to the product of interest and ensuring that any such certificates have not been altered after issuance.	Amended to reflect multiple comments on this section of the document.
280	Closed	ge	Verify claim issuers:… the provisions are questionable as disclosing economic relationships of entire supply chains as those could affect market / competitive behavior	In other words, a value chain actor with legitimate interests can reliably trace back a company or person that has issued a claim and e.g. the company's name, address, and business registration.	Amended to reflect multiple comments on this section of the document.
287	Closed	te	"For example, only accredited auditors of the Aluminium Stewardship 287 Initiative (ASI) can certify members against the ASI standards." Footnote: Aluminium Stewardship Initiative. Accredited Auditing Firms. Aluminium Stewardship Initiative. https://aluminium-stewardship.org/get-certified/accredited-auditing-firms. Accessed February 6, 2025. This text stands in opposition to ISO CASCO standards, which specify ISO 17011 as the applicable standard for Accreditation Bodies to meet. ISO 17011 is also the basis of the global Mutual Recognition Agreements and Multilateral Recognition Arrangements (ILAC/IAF). The Aluminum Stewardship Initiative is an industry scheme and is not accredited to ISO 17011 for the purpose of accrediting their third party auditors.	Delete the offending text and footnote. Of course, there is scope in UNTP for any/all forms of third party endorsement/authorisation, but giving no example is preferable to providing a single example that tramples the principles of ISO CASCO.	Amended to reflect multiple comments on this section of the document.
289	Closed	ge	I can understand the idea that a party to whom a certificate has been issued might be regarded as a 'certificate holder'. However, I do not believe that the idea of a 'claim holder' is useful or meaningful in the context of supply chains.	Delete item IV	Amended to reflect multiple comments on this section of the document.

296	Closed	te	A reference to “Principles for Good Governance” does not exist in the OECD Due Diligence Guidance for Responsible Business Conduct (RBC), at least not under that name. The Guidelines reference the G20/OECD Principles of Corporate Governance (updated in 2023), which are a distinct framework focused specifically on governance (e.g., board responsibilities, shareholder rights, transparency). Or you may mean the work undertaken by the OECD to align certification schemes and industry initiatives with the OECD Due Diligence Guidance for RBC, as well as its sector-specific variants. These so-called OECD Alignment Assessments include a Credibility Assessment (previously known as the ‘Governance Assessment’) besides an assessment of an initiative’ standards and of their implementation. In addition, it is not clear how Rec. 49 and its supporting instruments can encourage the alignment of certification schemes with OECD and ISEAL credibility criteria or principles. Are these principles somewhere linked to or referenced in Rec. 49 and/or the UNTP?	Replace reference to OECD “Principles for Good Governance” by a reference to the credibility assessments as part of the OECD Alignment Assessments for certification schemes and industry initiatives. You may use this website as reference: https://mneguidelines.oecd.org/industry-initiatives-alignment-assessment.htm. Note that alignment assessments are currently only being undertaken against the garment and minerals sector Due Diligence Guidance of the OECD, for sector-agnostic certification schemes.	Amended to reflect comment. Referenced to "Principles for Good Governance" replaced by a reference to the credibility assessment as part of the the OECD Alignment Assessments for certification schemes and industry initiatives.
299	Closed	ed	1.4.2 Indirect Benefits	<this section Indirect Benefits is not the best one. The terms in the listed benefits shift from:sustainability information* sustainability disclosures* disclosuresdigital claims,sustainability claims* product sustainability digital sustainability information. Elsewhere in the document: corporate disclosure sustainability reports sustainability reporting non-financial reporting due diligence*, due diligence certificates due diligence schemes due diligence reporting , due diligence reports credibility reports <Use terms consistently. Include at least some of them in the annex. Some are marked above with *. The difference between sustainability information and disclosure is vague in the annex.> <Why does the verifiable nature of sustainability disclosures ensure that they are supported by evidence? It only increases confidence that they are backed by evidence, but it does not automatically guarantee it.>	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
304	Closed	ed	Sentence seems incomplete. Same for 309 and 313.	Delete colon behind “increased consumer trust” or complete sentence “by enabling the transparent verification of sustainability claims and disclosures….”	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
310	Closed	ed	simplifying manufacturers and suppliers entry into new markets	simplifying manufacturers' and suppliers' product entry into new markets.<it is about products entering the market>	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
317	Closed	ge	This should include a reference to economic resiliency and non-market players.	New paragraph: “Help monitor non-market interventions: by improving transparency of supply chains and their related provenance to help identify nodes of high risk to coercion or corruption due to non-market interventions, which threaten the prospect of an equal playing field.”	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
317	Closed	ge	This indirect benefit is controversial.	Include supporting evidence for the positive correlation between verifiable sustainability disclosures of products and consumers’ willingness to pay.	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.

320	Closed	ed	Unveil unsustainable behaviour: The verifiable nature of sustainability disclosures ensures that they are supported by evidence enabling regulatory bodies and consumer watchdogs to detect unsustainable behaviour, such as greenwashing.	Unveil unsustainable behaviour: The verifiable nature of sustainability information ensures that they are supported by evidence enabling regulatory bodies and consumer watchdogs to detect unsustainable behaviour, such as greenwashing.<The word “disclosures” is too restrictive. It leans heavily in practice to corporate disclosures. When using disclosures throughout this document, it is not clear on what level they are used (product, company, facility, process). Using sustainability information, together with its now updated definition in the annex is much more flexible. Either use prefixed disclosure or just sustainabiity information>	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
323	Closed	ge	Risk mitigation	Mechanisms need to be established how to identify risk of value chain disruptions while maintaining data sovereignty	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
326	Closed	ed	The implementation of Recommendation No. 49 provides businesses with robust, easier to discover sustainability claims about their products, improving access to capital, insurance, and financial services and can improve the reputation of a value chain actor.	The implementation of Recommendation No. 49 provides businesses with robust, easier to discover sustainability claims about their products, improved access to capital, insurance, financial services and value chain reputation.	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
327	Closed	ge	…claims about their products… is insufficient as many aspects root in corporate behavior e.g. respecting human rights, work conditions	… claims about their products and procedures…	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
329	Closed	ge	This is a bold claim. Will we really be able to define and establish what constitutes “sustainable business practices”, or should we not rather reference broadly accepted principles such as the OECD MNE Guidelines for Responsible Business Conduct or the UNGPs?	Consider softening the language of this claim to make it sound more balanced. This could help ensure it is more inclusive of widely accepted definitions and principles of “sustainable business practices” and avoids sounding too assertive.	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
340	Closed	le	The concept of "verify credentials" may be appropriate in contexts where a product or operator requires a specific permission or authorization—such as import licenses, certificates for food safety, animal health, or the handling of hazardous materials. In such cases, compliance is typically determined by a single authority, and the outcome is clearly defined (e.g., approved or not approved). However, in the context of market surveillance, "verify credentials" may not fully capture the complexity of the process. Market surveillance authorities often assess different aspects of a product based on their	The role of marked surveillance authorities and their capabilities needs to be revisited, analysed and streamlined.	Amended to reflect comment.
340	Closed	ge	What is meant by “register for due diligence schemes”	Define, incl. its relation to interoperable implementation, or delete.	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.

341	Closed	ge	The OECD and organizations promoting the UNGPs are likely to object to the claim that traceability and conformity verification are strong foundations for due diligence enforcement as they see other elements such as purchasing practices, stakeholder engagement as well as proper risk scoping and risk prioritisation as foundational for risk-based due diligence, while traceability is rather considered a tool to support implementation and enforcement.	Replace “Create a basis to build a due diligence enforcement framework:” by “Support enforcement of due diligence requirements”, and “provides a strong foundation” by “are useful tools”.	Amended to reflect comment. Indirect benefits have been updated and consolidated into Table 4.
350	Closed	le	There are different types of market surveillance authorities. In the European Union, some operate at a multinational level, overseeing compliance with EU laws and regulations. Their power is limited to the scope of EU legislation, which is binding for national lawmakers. This is typically the case for areas such as trade, and financial regulations. In such contexts, a mutual recognition of authority could potentially be functional, and the previous comment should be taken into consideration. However, market surveillance authorities also operate under national legislation, which varies from country to country. This is the case, for example, with building regulations in Europe. Compliance with building regulations in one country does not necessarily imply compliance in another. From a citizen's perspective, it would not be transparent which verifiable credential has authority over which part of the market. If a system of verifiable credentials is applied in this way, it would require strict and continuously updated governance. The system must clearly indicate which verifiable credential is valid for which market segment and for which product.	The role of national marked surveillance authorities and their power needs to be revisited, analysed and re-considered. A system as described in this document would need a strict governance of the area of authority and responsibility of national authorities across national borders. This and the issues mentioned in previous comment should be carefully revisited.	Amended to reflect comment.
350	Closed	te, ge	The document does not address how time limitations or validity periods for verifiable credentials are to be managed or implemented. In Norway, for example, there is a central certification system for companies eligible to participate in construction projects under public procurement. This	Recommendation 49 should introduce the principles that are intended to cover this and also document a careful assessment of the required technical infrastructure and costs for such a system.	Amended to reflect comment. See Part II for extensive description of design principles for supporting instruments.
358	Closed/Duplicate	ge	Several standards are referenced. Several aspects of those standards are hardly realizable in all industrial value chains e.g. traceability of batches even back to raw materials as blending will occur in the production chains. Strict implementation would disclose confidential business information such as bill of materials or supplier – customer relationships. Such disclosures are inacceptable and would harm free market mechanisms.	Consider real industrial practice and amend model at least by adding further solutions of accounting such as mass balance chain of custody.	Addressed, duplication from another contributor
358	Closed	ge	As far as sustainable value chains are concerned, the most widely referenced international standards are the OECD MNE Guidelines, the UNGPs and the ILO MNE Declaration.	Consider mentioning these international standards in Section 1.5.	These are already mentioned in Part I, Chapter I (a section which has also been expanded). This section reflects the international instruments that Recommendation 49 builds upon.
359	Closed	ge	“The creation and development of supporting instruments for Rec. 49 shall be based on international recommendations and standards.” However, here only UN/CEFACT and UNECE standards are referenced. Ongoing standardization activities by the established European and international standardization organizations should be referenced as well, such as the European Digital Product Passport developed by CENCELEC and JTC24. Otherwise there should be no referencing to specific standards.	We request to add a reference to ongoing standardization activities by the established European and international standardization organizations, such as the European Digital Product Passport, together with an acknowledgment that any DPP System will properly interface with the outcomes from such standardization activities. Otherwise there should be no referencing to specific standards.	Amended to reflect comment, language changed.

359	Closed	ge	This list of international standards could be significantly expanded-starting with ITU standards for DPPs and ISO circularity datasheet.	~~and~~ UN/LOCODE20, ISO 59040:2025 and ITU L.1070, ITU L.1071 for ICT goods.	Amended to reflect comment. Added in footnote: Examples of other relevant international standards include ISO 59040:2025 “Circular economy — Product circularity data sheet (PCDS)” or ITU L.1070 (11/2023): Global Digital Sustainable Product Passport Opportunities to Achieve a Circular Economy. Also to be noted the electronic business memorandum of understanding ebMoU between IEC/ISO/ITU/ UNECE, which is an agreement established in 2002 to promote interoperability and harmonization in electronic business standards.
362	Closed	te	EB: SPS is not about sustainability, it’s about animal health, public health and plant health. BSP eQuality might be relevant as a standard.	EB: Delete current reference to:UN/CEFACT e-CERT19 (and the associated footnote) Replace with: BSP eQuality	Amended to reflect comment.. Replaced e-CERT with BSP eQuality
362	Closed	ed	UN/CEFACT e-CERT	<I would rather refer to use UNCEFACT Digital Product Certificate Exchange https://unece.org/sites/default/files/2024-07/BRS-DigitalProductConformityCertificateExchange.pdf >	Amended to reflect comment. Replaced with the UNCEFACT Digital Product Certificate Exchange https://unece.org/sites/default/files/2024-07/BRS-DigitalProductConformityCertificateExchange.pdf >
365	Closed	ge	1.5 misses a reference to the standards developed by CENCELEC and JTC24 for the European Digital Product Passport.	Add a reference to the European Digital Product Passport together with a short acknowledgment that UNTP will properly “interface” the outcomes from that standardization activity	Amended to reflect comment. See Glossary description
366	Closed	ge	EB: The language in the chapter is not of a recommending style, it’s of a quite strong and dictating style referring to a specific supporting instrumental concept without paying attention to responsibilities of other international standard setting organisations.	EB: Replace section heading‘Recommendations’ with alternate heading ‘Actions’.	No changes made. Recommendations are a required element of a UN/CEFACT Policy Recommendation.
367	Closed	ed	Simplify jargon: Remove ‘agrees to’ and ‘that’ . And if these are not the only actions you hope governments may take to scale traceability, add ‘take actions to scale traceability, prioritizing (or including) those listed	The United Nations Centre for Trade Facilitation and Electronic Business (UN/CEFACT) agrees to recommends that national and regional policy makers to take the actions to scale traceability, prioritizing those listed below:	Amended to reflect comment.
372	Closed	ge	… establish a national traceability and transparency framework … Traceability is a costly, complicated and for some segments ambiguous.	Change to …. establish a national transparency framework …	Amended to reflect comment.

373	Closed	le	It may be better to define the meaning of 'risk-based', what are the risks?	Included the definition of "Risk-based due diligence is understood as "the process through which enterprises can identify, prevent, mitigate and account for how they address their actual and potential adverse impacts as an integral part of business decision-making and risk management systems.", in line with the OECD Guidelines for Responsible Business Conduct.	Amended to reflect comment. OECD definition of risk-based due diligence has been included.
378	Closed	ge	… of full supply chain traceability, …	Rewrite as follows: The policy should foster transparency in supply chains while leveraging macroeconomics. To foster collaboration, all supply chain actors shall be allowed to see the relevant information of their direct suppliers (one level up) and customers (one level down). Traceability shall only be used when required (e.g., the Supply Chain Act) and when it makes macroeconomic sense.	No changes made, as it conflicts with other comments in this section.
378	Closed	ge	Avoid the use of "full" supply chain traceability in this context as it might be encouraging language for extraterritorial policies- going beyond the jurisdiction of the country to issue and enforce the national policy. ESPR and the EU DPP for example, is limited to the entry into the EU market.	The policy should strike a balance between cost considerations and the logistical complexities of full supply chain traceability,	Amended to reflect comment.
382	Closed	le	What is the meaning of 'a community audit system'?		Amended to reflect comment. Definition added to the glossary.
382	Closed	te	While desirable, a community audit system (if understood here as a participatory approach where local community members are involved in monitoring and verifying the authenticity and compliance of products or processes within a supply chain) is not widely practiced yet, so it is unclear why it is presented here like a standard approach to traceability that could be considered sufficient in non-high-risk sectors.	Be more specific about the contribution of community audit systems to value chain traceability.	Amended to reflect comment. Definition added to the glossary.
385	Closed	ge	… their national traceability framework … This recommendation primarily promotes transparency. Name it as such.	Rewrite as follows: … their national transparency framework … (i.e. delete traceability)	Amended to reflect comment.
390	Closed	ed	and resistance to change in data exchange practices	and resistance to change existing systems (e.g. ERP). <if ok, add ERP in Annex, acronyms list>	ERP has been removed, and language has been added throughout the document to reflect the need to seek interoperability between centralized, federated and decentralized data sharing systems.
403	Closed	te	Recommendations shall be forumulated technoly and project agnostic.	Remove paragraph lines 403 – 413.	Amended to reflect comment, reference changed. UNTP has been moved to an Annex.
406	Closed	ge	Why this mention of "any other equivalent supporting instrument" when the objective should be to establish the UNTP as a common standard at scale?	Delete "or any other equivalent supporting instrument".	No changes made. Based on multiple comments, the document has been updated to focus on design principles for supporting instruments. UNTP has been moved to an annex as an example of a supporting instrument.

407	Closed	ge	The current text avails the UNTP to countries, but it might be useful to add language to ensure that if they do not opt for using the UNTP at least they use it as guidance to ensure interoperability and accessibility of information (it would be a loss for everyone if each country start developing their own frameworks while we know that value chains are global. If each country tracks different things, with different methods, it will not be possible to simply add up data, and it will defeat the main objective of reaching traceability at scale . You may consider even including an additional bullet to the list on lines 396-400 .	National and regional policy makers can use UNTP or any other equivalent supporting instrument, [add language here re respecting interoperability and accessibility of information] that mitigates the listed challenges and follows the implementation principles and concepts provided in the Guidelines in Section 2 of this recommendation.	Part II has been extensively modified to describe design principles of supporting instruments, including interoperability and accessibility of information.
407	Closed	ge	The recommendation should mention also other supporting instruments. For example, the Global Framework for Digital Product Information Systems that UNEP, ITU, UNIDO, Wuppertal Institute and WBCSD are co-developing can also be referenced, suggesting that there is a breath of instruments currently being developed and that once aligned, can facilitate traceability at scale.	The UN Environment Programme, the International Telecommunications Union, UN Industry Development Organization and other key partners are developing a Global Framework for Digital Product Information Systems (HYPER LINK: https://www.codes.global/resources/digitalization-for-circular-economy-initiative), aimed at providing guidance and harmonizing the data categories required for tools such as DPPs, along the life cycle of products. This framework could complement instruments such as the UNTP. The framework also looks at the high-level principles on governance and technological architecture that can facilitate participation of developing countries in the DPP ecosystem.	Part II has been extensively modified to describe design principles of supporting instruments. UNTP has been moved to an Annex as an example of a supporting instrument.
411	Closed	ed	By adopting a widely used supporting instrument for transparency at scale	By adopting a supporting instrument for transparency at scale <widely is what we hope, it is not yet realized>	Amended to reflect comment.
411	Closed/Duplicate	ge	To our knowledge, UNTP is not yet fully developed, so its use is not possible. Other existing SCM frameworks are not listed.	Please rephrase so that UNTP can also be used for support.	Amended to reflect comment, language changed.
411	Closed	ge	UNTP is not ready, how this can be widely used? Why other frameworks for SCM like SCOR are not mentioned	Rephrase in a way, that UNTP can be next to others a candidate for the support	Amended to reflect comments. Text modified as is was misleading.
418	Closed	te	National and regional policy makers also have an important role in establishing and maintaining registers of products, assets, facilities, and businesses, which are important to link discoverable credentials such as Product Passports or Facility Records to their product or facility identifiers.	Add “maintain registers of products, assets, facilities, and businesses” behind “issue permissions”, or mention the role of governments as registry operators in the paragraph starting with line 424.	Amended to reflect comment.
418	Closed	te	The mention of specific technologies contradicts the required technological openness and neutrality.	The mention of specific technologies must be removed everywhere. In particular, other technologies exist and are excluded by a conclusive list. Furthermore, future developments are prevented and excluded.	Amendments have been made throughout the document to address this comment.

418	Closed	te	Specific technologies like W3C standards are mentioned in the main text – because there exist other standards in parallel. This is in conflict to technology openness	Keep out any specific technology and put a list into an annex. The argument to have a practical explanation is not valid because: 1. For a policy recommendation technical specifics are not relevant 2. Those technologies are highly sensitive and are very much misinterpreted	Amendments have been made throughout the document to address this comment.
421	Closed	te	Ibid	Rewrite: National and regional policy makers generally define rules, issue permissions, and manage compliance. This role is enhanced when governments act as digital trust anchors and implement verification schemas based on international standards.	Amended to reflect comment.
422	Closed	ed	UNTP. “	UNTP.	Amended to reflect comment.
422	Closed	ed	Delete the reference to VC W3C as a specific endorsement of the standard in the recommendation. Despite VC standard being developed openly by a W3C Working Group composed of diverse stakeholders (governments, civil society, academia, companies), it is not an internationally recognized standardization body in the sense of ISO or ITU.	based on an internationally agreed implementation of a ~~the~~ globally recognized W3C standard for VCs, such as that provided by UNTP.	Amended to reflect comments. The reference was removed to align with other comments.
425	Closed	ed	verifiable government credentials	government-issued verifiable credentials	Mention of specific technologies have been removed throughout the document.
426	Closed	le	I am not sure that test/lab results would all be issued by governments		Amended to reflect comment
430	Closed	ge	Suggest the deletion of the entire section as it might be too burdensome for the vast majority of Member States.	verifiable way. ~~Regulators, such as~~ ...[deleted] Alternatively, suggest a progressive approach.	Amended to reflect comments. Language has been softened, and adjusted to specific functions of different government entities.
432	Closed	te	Ibid	Rewrite: … should issue registration documents enabling verification by verification schema based on open and international standards.	Amended to reflect comment.

434	Closed	ed	digital verifiable credentials	verifiable credentials <rest of this use is without digital, choose one form throughout the document>	Reference to verifiable credentials has been removed throughout the document in response to multiple comments.
436	Closed	te	Ibid	Rewrite: … should issue all permits and certificates enabling verification by verification schema based on open and international standards.	Amended to reflect comment.
436	Closed	te	EB: 'Competent' has been deleted as UN/CEFACT is not in the position to determine this on behalf of the SPS standard setting organizations Codex IPPC and WOAH, because SPS-certificate exchanges concern G2G exchanges to confirm compliance with the requirements of an importing	EB: Replace with:"II. Authorities, such as departments of agriculture, environment…"	Amended to reflect comment.
439	Closed	te	Ibid	Rewrite: … boundaries such that verification by verification schema based on open and international standards is possible	Amended to reflect comment.
445	Closed	te	Ibid	Rewrite: … permits such that verification by verification schema based on open and international standards is possible.	Amended to reflect comment.
447	Closed	ed	as virtual credentials.	as verifiable credentials. <why virtual?>	Amended to reflect comment.
448	Closed	te	Ibid	Rewrite: … entities to issue IDs and Certificates such that verification by verification schema based on open and international standards is possible.	Amended to reflect comment.
455	Closed	te	Ibid	Remove: such as the UNTP	Amended to reflect comment.
480	Closed	te	To avoid fragmentation, not all governments should establish their own benchmarks but rather adopt existing internationally agreed ones.	Add "or adopt existing" behind"establish".	Amended to reflect comment.
480	Closed	ge	"Establish sustainability benchmarks" it is not defined how to do that	Explain how to do benchmarks or keep it out	Amended to reflect comments.
481	Closed	te	Trade unions should also be mentioned as a stakeholder group to engage with to ensure proper labour rights due diligence.	Add "workers and their representative bodies" to the group of listed stakeholders.	Amended to reflect comment.

485	Closed	ed	fund contributions to the development of supporting instruments	fund contributions to the development and maintenance of supporting instruments	Amended to reflect comment.
493	Closed	Ed	BH: Redundant words	EB: Replace with:“Section 2 provides…”	Amended to reflect comment.
496	Closed	ge	This recommendation is to foster transparency at scale and not promote projects or dedicated technologies.	Remove: , and an overview of the UNTP	Amended to reflect comment.
498	Closed	ge	EB: A guideline or principle can contain recommendations, so it might be questionable to use guidelines the other way around	EB: Replace heading with: “From Recommendation to Reality: Implementing Transparency at Scale”	Amended to reflect comment, with some modifications.
505	Closed	ed	in achieving the benefits described in Section 1.	in achieving the benefits described in Section 1.	Amended to reflect comment with some modifications, language changed to achieve consensus with other related comments on this section of the document.
514	Closed	ge	Referring to my general comment on the lacking distinction between inherent and extrinsic properties, this section is a good example of the misunderstandings that can arise:It is stated that “The use of secondary data removes any incentive for suppliers to compete on sustainability performance” and for buyer to improve their performance based on differentiated supply. This is only true for inherent properties. For an extrinsic property, e.g. GHG emissions, secondary data on the marginal	Replace the misleading text in column 1 with a text along the lines of: “For value chain actors to invest in being more sustainable or more transparent, material incentives need to exist. This can be implemented in the form of contracts with buyers that are willing to pay a premium price for a product with better sustainability performance than the marginal market supply. Such contracts require mechanisms to guarantee that the improvements are real, that the claims are not made for a larger product volume than actually produced with better	Amended to reflect comment, with some modifications. These concepts are now addressed in Part II, Chapter I - Supporting instrument implementation challenges; Chapter II C. Trust and Conformity Design Principles, and 2.2.5 Business Incentives.
514	Closed	ed	2.1.2 replace “digital data requirements” with “transparency requirements		Amended to reflect comment.
514	Closed	ge	Implementation Challenges and Mitigation Strategies	Add the challenge of malicious behavior in value chains, how to detect such practices and involved actors, including international collaboration in doing so.	Amended to reflect comment.
514	Closed	ed	to align the products and services	to align the products <I do not think services are in scope>	This section of the document has been amended to reflect multiple comments.
514	Closed	te	2.1.8 Implementation costs must be kept to a minimum 1) Standards that have the following characteristics: • They are open, available free of charge** and with open participation in their maintenance. *** • Designed to minimise unnecessary change. For example, by supporting existing product identifiers and data carriers. • Are as simple and cheap as possible • Avoid vendor lock-ins.	1) Standards that have the following characteristics: • They are open, ~~available free of charge~~ and with open participation in their maintenance (?). • Designed to minimise unnecessary change. For example, by supporting existing product identifiers and data carriers. • Are as simple and cheap as possible • Avoid vendor lock-ins. • Normative standards developed for regulatory purposes	This section of the document has been amended to reflect multiple comments. These concepts are now addressed in Part II, Chapter II.
514	Closed	te	Account for data sovereignty 2.1.2 Interoperability across industry and national boundaries Interoperability requires a generic cross-industry and cross-border standard that can be extended to meet specific industry or jurisdictional	Interoperability requires a generic cross-industry and cross-border standard that can be extended to meet specific industry or jurisdictional needs while maintaining cross-industry and cross-border interoperability without compromising data sovereignty.	This section of the document has been amended to reflect multiple comments. These concepts are now addressed in Part II, Chapter II.
514	Closed	te	2.1.8 Implementation costs must be kept to a minimum 4) Standardised, cost efficient means to collect data from across the	4) Standardised, cost efficient means to collect data from across the value chain without compromising business confidentiality.	This section of the document has been amended to reflect multiple comments. These concepts are now addressed in Part II, Chapter II.

514	Closed	te	2.1.2 Interoperability across industry and national boundaries To be successful, interoperability tools need to complement and not compete with regulated product passports and industry-specific product passports.	To be successful, interoperability tools need to complement and not compete with regulated product passports and industry-specific product passports. The key point to this is the reuse of the technical data tools regulated product passports require to fulfil regulatory purposes.	This section of the document has been amended to reflect multiple comments. These concepts are now addressed in Part II, Chapter II.
514	Closed	ge	The table of challenges and mitigation strategies should advocate for multiple standards for interoperability, one single standard might be too prescriptive in section 2.1.2 at this point in time.	2.1.2 Interoperability across industry and national boundaries Interoperability requires a generic cross-industry, cross-domain and cross-border standards that can	This section of the document has been amended to reflect multiple comments. These concepts are now addressed in Part II, Chapter II.
514	Closed	ge	2.1.6 Add the requirement of the metadata	Any data that is exchanged needs to have a human readable rendering and metadata.	This section of the document has been amended to reflect multiple comments. These concepts are now addressed in Part II, Chapter II.
515	Closed	ed	2.1.8 Change by adding the small passage in italics " For a viable business case to exist, the costs to implement and operate digital traceability and transparency systems – including auditing costs- must be lower than the value derived from the data .Again later on the right column in point 5) Standardized cost efficient means and methods for risk based due diligence for data assurance and reporting		This section of the document has been amended to reflect multiple comments. These concepts are now addressed in Part II, Chapter II.
520	Closed	ed	The subtitles are inconsistent. Some use adjectives, some use nouns. For instance: 2.2.5 Customizable and Modular and 2.2.12 Inclusive Governance	Consider using nouns, e.g 2.2.4 Interoperable -> Interoperability	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
526	Closed	le	Rephrase to allow for the possibility that some countries may wish to make this into a regulation? See suggested language	The implementation of Recommendation No. 49 is voluntary, leveraging incentives to encourage participation at the regional and national levels.	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting

528	Closed	le	Same as above. Delete 'compared to mandatory regulations'	~~Compared to mandatory regulations~~, This approach allows flexibility for businesses and organizations to adopt solutions tailored to their unique operational and jurisdictional contexts.	Amended to reflect comments. Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments. This langauge is reflected in Part II, Chapter II, G - Governance Design Principles.
531	Closed	ed	in Part 1	in Section 1 <we use "sections" throughout the document>	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting
534	Closed	ge	Global Standardization mention this also earlier, as part of the actions listed from line 367	Add this action among those in section 1.6	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
536	Closed	te	The objective should be alignment rather than harmonisation.	Replace "harmonise" by "align with" or "conform with".	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
540	Closed	ed	Supporting instruments should be based on open standards that are free of charge.	Supporting instruments should be based on open standards. <Add footnote: not all open standards are free of charge, such as ISO standards (see also comment for 2.1.8. page 20)>	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
548	Closed	te	Interoperability is defined in standards such as ISO 19941:2017 or ISO 11354-1:2011. Cite them and stick to their nomenclature.	Rewrite: … to enable interoperability. Interoperability shall be achieved according to ISO/IEC 19941:2017 in five facets: 1) transport (who is information exchanged), syntactic (how is information formatted), semantic (what is the meaning of the information), behavioral (what is the purpose and expected outcome of an exchange of information) and policy (what rules govern an exchange). This ensures …	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles that are reflective of the five facets of interoperability described in this comment.
558	Closed	ed	delay for the consensus of the umbrella system.	delay for the consensus reached by a centralized governance system.	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
563	Closed	ge	This recommendation is to foster transparency at scale and not promote projects or dedicated technologies.	Remove: and the UN Transparency Protocol (UNTP)	Amended to reflect comment. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments. UNTP has been moved to an annex as an example of a supporting instrument.
567	Closed	ed	Numbers for the subtitle are incorrect.	2.2.~~12~~6	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
589	Closed	ed	in its maintenance, continued development, and adoption.	in its development, maintenance and adoption.	Amended to reflect comment.

596	Closed	ed	Supporting instruments must allow due diligence verification of both companies and products across multiple contexts	Supporting instruments must enable due diligence verification of companies, including the sustainable production practices of their products across multiple contexts <due diligence is something at company level not on product level. The product is not verified/assessed but the processes.>	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
599	Closed	ed	that companies can demonstrate compliance with regulatory and market requirements, while products are assessed for traceability, sustainability, and ethical standards.	companies must demonstrate compliance with regulatory and market requirements, while products are assessed for traceability and sustainability, and corporations are evaluated based on ethical standards.<ethical standards relate to the due diligence of a company. The products made by a company inherit those aspects but are not assessed on them>	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
607	Closed	ed	in line with the above-mentioned principles	in line with the supporting instrument principles<clearer>	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
612	Closed	te	The DPP is only issued and stored by the economic operator and can be updated by supply chain actors.	Rewrite: is issued and decantrally stored by the primary producer / economic operator and can be updated by other supply chain actors such as recyclers, remanufacturers, etc. of the product.	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
613	Closed	ed	by the primary producer, recycler, or manufacturer of the products	by the primary producer, manufacturer, or recycler of the products. <more logic sequence aligned with figure Fig. 1.3.1 Scope of Recommendation No. 49 positioned on line 242>	Amended to reflect comments. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
613	Closed	te, ge	…. almost every value chain crosses industry boundaries…. a DPP represents a digital twin of a product. Information from the value chain, e.g. PCF scope 3.1, will contribute to the DPP content. However, the DPP is NOT a map of the product's value chain. The definition of value chain remains ambiguous throughout the document.	Clarify terminology of value chain. Does it mean upstream manufacturing chain or a product use life after being placed on a market? Consider consequences of value chain definition on economic practice.	Amended to reflect comment. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments. Definition of value chain has been included in the glossary.
614	Closed	ed	the DPP is a generic cross-industry and cross-border vehicle that can be extended to meet specific industry or jurisdictional needs while maintaining cross-industry and cross-border interoperability.	the DPP is a generic cross-industry and cross-border vehicle that can be extended to meet specific industry or jurisdictional needs while maintaining on core data level cross-industry and cross-border interoperability.<on core data level added>	Amended to reflect comment. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
617	Closed	ed	The meaning of the last sentence is unclear		Amended to reflect comment. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
618	Closed	ge	Provide an example of harmonized and comparable	Add: "The Global Battery Alliance is developing a set of sustainability indicators across salient risks and impacts, which can be used by DPP solution providers and companies issuing their own DPPS, to communicate on sustainability performance in a globally harmonized, comparable format."	Amended to reflect comment. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
619	Closed	te	Formulate it neutral and do not follow project results or dedicated technologies.	Rewrite: Digital conformity certificate enabling verification of conformity by verification schema based on open and international standards.	This section has been amended based on multiple comments. Please see Part II, Chapter II, C. Trust and Conformity Design Principles for updated language.

620	Closed	ed	for sustainability claims (products/facilities) and sustainability disclosures (companies).	for sustainability claims made about products or corporates (including facilities).	Amended to reflect comment. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
624	Closed	te	Ibid	Rewrite: Supply chain events: Supporting instrument to collect and send events along a supply chain to foster supply chain transparency.	Amended to reflect comment. Based on suggestions from multiple comments, Part II has been adapted into a set of design principles for supporting instruments.
624	Closed	te	Traceability events pose an unacceptable risk to revealing supply chain details that are trade secrets of economic actors	Remove clause on “digital traceablilty events”	Agreed. Removed. See Part II Chapter II.A Architecture Design Principles for updated language.
624	Closed/Duplicate	te	Traceability events pose an unacceptable risk to revealing supply chain details that are trade secrets of economic actors	Remove clause on “digital traceablilty events”	Addressed, duplication from another contributor.
627	Closed	te	Ibid	Rewrite such that not only one possible technology, in this case verifiable credentials, is displayed.	Amended to reflect comment.
627	Closed/Duplicate	ge	Verifiable credential centric approach would goes against inclusivity and technology openness and neutrality. See line 418-422	Individual methods may not be mentioned. Different and appropriate suggestions for data verification may not be excluded.	Amended to reflect comment, removed.
627	Closed	ge	Verifiable credential centric approach as proposed by using W3C standards would goes against inclusivity, technology openness as well as ignore other approaches for verification	There exist a bunch other principles and methods, can be digested in https://thebatterypass.eu/assets/images/content-guidance/pdf/2024_BatteryPassport_Conformity_Assessment.pdf	Amended to reflect comments. All references to Verifiable Credentials have been removed from the Recommendation. The Annex mentions them within the context of UNTP, as an example of an supporting instrument.
637	Closed	ge	Delete the reference to VC W3C standard. The white paper might not carry sufficient weight in the context of this recommendation.	mobile phone. ~~The World~~...[deleted]. A verifiable	Amended to reflect comments, removed.
640	Closed	te	VCs are inherently decentralized and, therefore, are an excellent fit for supporting instruments implementing Recommendation No. 49, i.e. digital product passports, digital conformity credentials and digital traceability events shall all be issued as W3C VCs	<The UNTP ‘pillar’ Digital Facility Record (DFR) is missing. Why is it not mentioned as an instrument? Line 620 states that conformity can be checked at the facility level. The existence of a DFR seems equally important as the existence of a DPP for a Digital Conformity Credential.>	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
644	Closed	te	Ibid	Rewrite this paragraph to promote semantic interoperability. As the rec 49 should be technology neutral do not focus on W3C vocabularies only.	Amended to reflect comments. All references to Verifiable Credentials have been removed from the Recommendation. The Annex mentions them within the context of UNTP, as an example of an supporting instrument.
676	Closed	ed	analog world. .	analog world.	Amended to reflect comment.
693	Closed	ge	Add reference to the Life Cycle Initiative for the word ‘life cycle’ to provide clarification on what is mean by life cycle	Add Source: What is Life Cycle Thinking? - Life Cycle Initiative (HYPER LINK: https://www.lifecycleinitiative.org/activities/what-is-life-cycle-thinking/)	Amended to reflect comments with a defintion added to the glossary.
704	Closed	ed	Digital Conformity Claims	Digital Conformity Credential <as it is used in UNTP>	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
717	Closed	ed	commercial secrets	confidential business information <keep in line with other usages>	Amended to reflect comment.

723	Closed	ge	Ibid	Remove paragraph 2.4 or present other projects such as gaia-x based stacks.	Amended to reflect comment. UNTP has been moved to the Annex. See Part II, Chapter II.B Interoperability Design Principles for reference to Catena-X, one of the Gaia-X stack implementations.
745	Closed	ed	1. An open standard, free of charge.	<open does not always mean free of charge. Will GS1 charge for usage of GS1 EPCIS 2.0 applied for DTE (Digital Traceability Events) instead of using equivalent standard in BSP? This should be sorted out.>	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
746	Closed	ed	2. Maintained via an open	2. Developed and maintained via an open	Amended to reflect comment.
746	Closed	ge	It has not be explained how the inclusive and consensus-based process works in detail. The github page shows very few contributors and committers, with “alias names”. The project has already bee forked, so multiple versions may be expected.	Move UNTP development to an organization with mature and internationally accepted policies and processes	UN/CEFACT is a UN standard setting body in the field of trade facilitation and e-business which operates based on UN policies, procedures and terms of reference (https://unece.org/trade/uncefact/policiesprocedures-and-termsreference), and in close alignment with ITU, ISO, IEC based on an ebMoU between the 4 organizations (https://assets.iec.ch/iecwebsite/partners/IEC-ISO-ITU-UNECE_MoU_e-business%7B2000%7Dv3.pdf). The UNTP project has over 412 members and works transparently and openly in line with the UN/CEFACT policies, procedures and terms of reference.
746	Closed/Duplicate	ge	It has not be explained how the inclusive and consensus-based process works in detail. The github page shows very few contributors and committers, with “alias names”. The project has already bee forked, so multiple versions may be expected.	Move UNTP development to an organization with mature and internationally accepted policies and processes	Addressed, duplication from another contributor
755	Closed	te	"The UNTP is based on a fully decentralized data architecture that is not dependent on any single technology or platform." Since EPCIS is a specific technology, this contradicts the aforementioned text.	We request that UNTP be moved to the appendix, which also mentions other approaches or does not mention UNTP.	Amended to reflect comment, The description of UNTP has been moved to an Annex. Langauge through the document has been updated to reflect other approaches.
755	Closed	te	“The UNTP is being based on a fully decentralized data architecture that does not depend on any single technology or platform” – EPCIS is a certain technology	Move UNTP to an annex, where other approaches are mentioned as well, e.g. AIAG IV&I	Amended to reflect comment, UNTP has been moved an the Annex.
756	Closed	ge	Suggest to define multiple standards for interoperability, one single standard might be too prescriptive at this point in time.	Delete: Instead, it will define the interoperability standards which 756 can allow thousands of independent systems to participate in a global value chain 757 transparency ecosystem.	Amended to reflect comments. Interoperability is explained in Part II, Chapter II.B and now also a term in the glossary.
759	Closed	ed	crosses industry boundaries and jurisdictional boundaries	crosses industry and jurisdictional boundaries	Amended to reflect comment.
761	Closed	ed	while maintaining	maintains, at core data level, interoperability <ore data level added>	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.

764	Closed	ge	Be more specific on the open standards to be used	Adding specific references to the text, at least as an example.	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
767	Closed	ge	"Regional or industry-specific terminologies and data requirements for specific use cases and regulations should be interoperable with a common core of UNTP." Such common core or the boundaries that should be respected as well as an extension methodology should be further defined. A common core of a DPP System should be interoperable and avoid limitations with specifications being developed such as the EU DPP.	We request that the common core is technology neutral and defined, specifying the functional requirements that must be fulfilled by implementing profiles. The abstract common core should be focused on a minimum set of requirements to meet multiple sectoral/national legislations or industry-specificities.	Amended to reflect comments. Part II has been updated into a set of challenges and design principles that are technology neutral and define a minimum set of suggested guidance for implementers. UNTP has been moved to an Annex and represents one example of an implementation that addresses these challenges and principles.
773	Closed	ed	by their creators.	by their extension owners. <term as used on github UNTP>	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
775	Closed	ed	Figure 2.4.1 Industry specific extensions of UNTP	<we use in caption throughout document fig. and figure. Use one manner.>	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
783	Closed	ed	transparency information necessary to support value chain sustainability outcomes, including due diligence and corporate disclosures.	transparency information necessary to support value chain sustainability outcomes, including corporate disclosures.<Due diligence is just one of the corporate disclosures that exists. Or write "including due diligence reporting and other corporate disclosures.>	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
819	Closed	ge	There is a high level of dependency on UNTP website if it is meant to track all measures. You might consider other alternatives.	Additional measures of uptake and impact may also be captured through other channels, such as industry reporting, third-party platforms, or national tracking systems.	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
826	Closed	ed	DCC Digital Conformity Certificate. Conformity credentials are issued by	DCC Digital Conformity Credential. Conformitycredentials are issued by<terms used as within UNTP>	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
826	Closed	ed	Sustainability information is an umbrella term that includes, e.g.sustainability disclosure (companies), sustainability claim (products), and traceability information.	Sustainability information refers to data, reports, and disclosures about the environmental, social, and economic impacts of a company, product, or process. It helps consumers, businesses and other stakeholders to make informed decisions.	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II of the Recommendation provides design principles for supporting instruments.
826	Closed	ed	Guarantee of origin (GO)	<Delete. Term not used in the document>	Amended to reflect comment.
826	Closed	ed	CBAM	<Delete. Acronym not used in the document>	Amended to reflect comment.
826	Closed	ed	ESRS	<Delete. Acronym not used in the document>	Amended to reflect comment.
826	Closed	ge	Suggest to change the source used for the term 'Circularity' .	See suggestion for line 218 above	Amended to reflect comments.

827	Closed	ge	The term value chain is missing definition	Distinguish “value chain” in the sense of : -the consolidating events of manufacturing a product -use life of a product until its terminal removal from the market by recycling or deposition. Moreover, the termination shall lead to a cut-off reporting on this individual product and its attributes. Recycling shall be considered as alternative to mining and the recovered materials shall receive attributes from recycling process eg PCF and “recycled”, the latter is needed to specify recycled content in next generation DPP.	Amended to reflect comment, added definition in glossary: "The full range of activities or processes needed to bring a product or service from its conception to its end use and beyond. This includes activities such as design, production, marketing, distribution, and support to the final consumer. The value chain includes entities with which the enterprise has a direct or indirect business relationship and which either (i) supply products or services that contribute to the enterprise’s own products or services, or (ii) receive products or services from the enterprise." (OECD Due Diligence Guidance for Responsible Business Condct, 2018)
145,265	Closed	ed	policymakers	policy makers	Amended to reflect comment.
109-112	Closed	ge	We propose to strengthen the message on sustainability and replace the passage 109-112 with the passage in the next cell	“For sustainability to become a competitive advantage and a decision factor in the modern economy, product sustainability claims and corporate disclosures need to be trustworthy. Trust can start a virtuous sustainability race where companies invest on green solutions seeking premium returns that in turn fuel a new round of sustainable investments”	Amended to reflect comment, text changed.
110 ff.	Closed	ge	“Therefore, if the trustworthiness of such claims and disclosures cannot be relied upon, any perceived progress may be false, and ineffective practices may be rewarded without merit.” Negative Statement	Proposal: “suitable effective process and rules adapted to risks and sustainable objectives”	Amended to reflect comment. Language changed.
113 ff.	Closed	ge	“Recommendation No. 49 has emerged in response to an increasing demand for policy action to enhance the trustworthiness, accuracy, and verifiable integrity of such claims and disclosures.” - There is a reference required.		Amended to reflect comment. References to international and regional policy, legislation and guidelines are included in footnotes 1 and 2.
156-159	Closed	te	The document highlights reducing complexity and costs but does not specify how digital tools will be made accessible to SMEs in developing economies with limited infrastructure. Many SMEs in low-income countries operate with minimal digital capacity, making it difficult for them to integrate transparency measures without significant investment. Without targeted support, these businesses may be excluded from international supply chains.	Suggest adding capacity-building programs or financial support mechanisms for developing economies to adopt digital product passports and traceability systems. Solution Example: For SMEs in areas with poor connectivity, offer mobile-based solutions and subsidized digital infrastructure. Governments can work with foreign technology companies and donors to create affordable, user-friendly digital tools that will be more widely adopted by small businesses.	Amended to reflect comment. To be successful, supporting instruments need to complement, and not compete with, both regulated DPPs and industry-specific DPPs, and be applicable to a wide range of value chains models, such as federated value chains.
168-170	Closed	ge	Unambiguous terminology can itself be ambiguous	“that uses unambiguous terminology” => suggest adding a recommendation for “…and harmonized performance metrics”	Amended to reflect comment.
171-172	Closed	ge	How does challenge 2.1.7. “Business confidentiality, data sovereignty and privacy align” with the on line 171-172 “without needing to login to a system.”	Make clear how to allow differentiated access in line 171-172.We propose to replace “without needing to login to a system” [which is not true because some type of authentication will be required when accessing confidential data including logins] with “e.g. with a simplified on boarding process via digital identities that can be used for authentication when interacting/ accessing with DPPs without a need of a central governance”	Amended to reflect comment.

183-186	Closed	te	While the purpose is well-defined, the recommendation does not clearly outline how governments can integrate this framework with existing national trade and tax policies. Many fiscal policies are already designed to promote trade facilitation, and adding transparency requirements should not contradict or hinder existing economic incentives.	Provide a section on policy integration strategies, ensuring alignment with fiscal policies and trade facilitation efforts.Solution Example: Provide policy toolkits to help national governments align tax incentives for sustainable enterprises with transparency standards. To integrate sustainability initiatives with economic growth, policymakers should be urged to offer tax advantages or credits to companies who adhere to transparency standards.	Amended to reflect comment.
2.1.1 Complex dependencies and scalability	Closed	te	What exactly does "data should be kept decentralized" mean? This isn't clearly defined enough.	We request clarification regarding decentralized data held.	Amended to reflect comments. We have made this language more clear throughout the document and specifically in particular in Part II, Chapter II.B Interoperability Design Principles.
2.1.1 Complex dependencies and scalability	Closed	te	“Data should be held decentral”. Has to be defined more clear. Is meant, that an central data management will host any data of a product group and coming from all partners, then I would agree. If It is meant, that each product needs an own data storage like a wallet then I disagree, because existing efficient systems like (IMDS in automotive industry) would be excluded.	Clarify the notion of decentralized approach	Amended to reflect comments. We have made this language more clear throughout the document and specifically in particular in Part II, Chapter II.B Interoperability Design Principles.
2.1.11	Closed	ge	Reporting does not drive sustainability, action does. This means that companies need investments in assets and processes		Based on multiple comments, Part II has been updated into a set of challenges and design principles that are technology neutral and define a minimum set of suggested guidance for implementers. UNTP has been moved to an Annex and represents one example of an implementation that addresses these challenges and principles.
2.1.2 Interoperability across industry and national boundaries	Closed	te	“a generic cross-industry and cross-border standard that can be extended to meet specific”. This does not address the industry-specific needs required, nor does it incorporate federated approaches.	Federated approaches must be considered and be interoperable at all levels.	Amended to reflect comments. We have made this language more clear throughout the document and specifically in particular in Part II, Chapter II.B Interoperability Design Principles.
2.1.2 Interoperability across industry and national boundaries	Closed	te	“a generic cross-industry and cross-border standard that can be extended to meet specific”. Do not fit with required federated approaches and do not cover cross industry obstacles.	Introduce federated approaches on all levels of interoperability	Amended to reflect comments. We have made this language more clear throughout the document and specifically in particular in Part II, Section II.B Interoperability Design Principles.
2.1.4	Closed	ge	is very much supported by companies who can demonstrate sustainable practice. The investments into sustainable practice would be recognized.	no proposed changes provided	Based on multiple comments, Part II has been updated into a set of challenges and design principles that are technology neutral and define a minimum set of suggested guidance for implementers.

2.1.4 Business incentives for implementation	Closed/Duplicate	ge	4) Make monitoring tools mandatory, including the Digital Product Passport (DPP), which contains sustainability information on the supply of each product at every stage of the value chain. How can this be implemented without incurring immense costs, especially for SMEs?	How data for a final product is consolidated in a DPP must be more open than creating a separate DPP for each small part and each step in the value chain.	Amended to reflect comment. See Part II, Section I Supporting Instrument Challenges; Chapter II.E Business Incentives Design Principles for language that addresses this point.
2.1.4 Business incentives for implementation	Closed	ge	"Regulations should also foster the increasing use of primary data in sustainability claims and disclosures" this would not change the operations cost challenge of primary data collection and management.	Proposal: Invest into infrastructure for collecting and management of primary data with similar cost and complexity as it is with secondary data	Amended to reflect comment. See Part II,Chapter II.E Business Incentives Design Principles for language that addresses this point.
2.1.4 Business incentives for implementation	Closed	ge	"Increase process efficiency" Data transparency do not make a product cheaper and is not an efficiency approach at all	Delete this sentence	Amended to reflect comments. Based on multiple comments, Part II has been updated into a set of challenges and design principles that are technology neutral and define a minimum set of suggested guidance for implementers.
2.1.4 Business incentives for implementation	Closed	ge	"4) Make surveillance tools, including Digital Product Passport (DPP) mandatory that is designed to carry sustainability information about each products' shipment at each step of the value chain" this would lead to immense costs. Especially established SME Networks, as widely established in the last 40 years would suffering here.	Proposal: Based on risk, effort and existing supply network systems, a DPP can contain sustainability information across the value chain	Amended to reflect comment. See Part II,Chapter II.E Business Incentives Design Principles for language that addresses this point.
2.1.6 Digital maturity and unequal adoption	Closed/Duplicate	ge	"Keep it simple" is a good approach. But what are the concrete solutions? See line358 ff. UN/CEFACT is mentioned here – contradicts technological openness and neutrality.	We propose to identify concrete solutions and compare them, but without evaluating them or excluding other solutions.	Amended to reflect comments. Based on multiple comments, Part II has been updated into a set of challenges and design principles that are technology neutral and define a minimum set of suggested guidance for implementers.
2.1.6 Digital maturity and unequal adoption	Closed	ge	The text contains no solution and just "keep it simple" Just achievements of UN/CEFACT are mentioned in in chapter 1.5, line 358ff. – this is against technology openness	Proposal: provide a framework, where existing best practices are among each other's	Amended to reflect comments. Based on multiple comments, Part II has been updated into a set of challenges and design principles that are technology neutral and define a minimum set of suggested guidance for implementers.
2.1.7	Closed	ge	requires an intelligent, value chain overarching information model including chain of custody governed accounting methods		Based on multiple comments, Part II has been updated into a set of challenges and design principles that are technology neutral and define a minimum set of suggested guidance for implementers.

2.1.8 Implementation costs must be kept to a minimum	Closed	ge	1) "They are open and available free of charge." This excludes technologies and standards from ISO and CEN-CLC standards. Providers of DPP systems and standards will be relying on business models based on sales or other service fees. Established standardization organizations such as ISO, IEC, CEN and CENELEC sell standards and therefore cannot provide standards free of charge.	We request a revision to adopt a cost-oriented interoperability approach.	Amended to reflect comment. See Part II,Chapter II.E Business Incentives Design Principles for language that addresses this point.
2.1.8 Implementation costs must be kept to a	Closed/Duplicate	ge	"They are open, available free of charge" It is right, that those cost are not suitable for SME, but this would lead to the exclusion of technologies and standards coming from ISO and CEN CLC standards. Implementation costs are related to a lot other aspects of business	Needs to be revised according to an interoperability cost oriented approach. For having a small glue about implementation cost, in the link below there are some hints: costs for standards are very minor in comparison to the other aspects. Here costs can be reduced by having technology neutral reference implementation models. See link below: https://thebatterypass.eu/assets/images/value-	Amended to reflect comment. Changed have been throughout the document to address this comment.
215 ff.	Closed	ge	"Transparency at scale", the scale is not defined	Include the notion of scalability, which means that the operations cost and time for transparency goes nearly to zero	No changes made. This is defined in the Glossary of terms.
225-228	Closed	ge	Suggestion to mention independent audits and assurance against existing standards to make sustainability claims verifiable, and promote interoperability between the standards via harmonized metrics	Suggest to add "reliability of sustainability claims (for products) and disclosures (for companies) with the help of security technology (verifiable credentials) and the involvement of trustworthy actors, such as ministries and accredited bodies … and assurance of claims by independent 3rd party audits against	Amended to reflect comment.
243-260	Closed	ge	This section should also list the identifiers as not in scope to be also interoperable there.		Amended to reflect comment. See Part II,Chapter II.E Business Incentives Design Principles for language that addresses this point.
264-266	Closed	ed	BH: 'Implementation of' or 'Legislation based on'? Also, 'directly benefit' appears twice in this sentence and the first seems to be a typo'	EB: Replace with:Legislation based on Recommendation No. 49 and its supporting instruments developed by national and regional policymakers around the globe has the potential to create a level playing field from which multiple value chain actors in sectors that are critical for the green and digital transformation will directly benefit.	No changes made. Recommendation No. 49 does not have the goal to be the basis of a legislation, but rather to be the basis of supporting instruments that support becoming compliant with a legislation or a company goal. So the proposed formulation is: "Policies and legislation based on Recommendation No. 49 and its supporting instruments developed by national and regional policymakers around the globe have the potential to create a level playing field from which multiple value chain actors in sectors that are critical for the green and digital transformation will directly benefit".
277 ff	Closed/Duplicate	te	Several sectors today are working since many years based on self-certification schemes without involvement of a "certification issuer".	Replace "certification issuer" with "claim issuer"	Addressed, duplication from another contributor.
277ff	Closed	te	Several sectors today are working since many years based on self-certification schemes without involvement of a "certification issuer".	Replace "certification issuer" with "claim issuer"	Amended to reflect comment.

292 ff	Closed/Duplicate	te	It is not correct that introducing an additional reporting tool (DPP) reduces reporting efforts	Remove clause	Addressed, duplication from another contributor.
292ff	Closed	te	It is not correct that introducing an additional reporting tool (DPP) reduces reporting efforts	remove clause	Amended to reflect comment, laguage has been updated.
296 ff	Closed/Duplicate	te	The credibility of certification schemes is not determined by an electronic exchange of information, it is mainly driven by market acceptance due to their competences.	Remove clause	Addressed, duplication from another contributor.
296ff	Closed	te	The credibility of certification schemes is not determined by an electronic exchange of information, it is mainly driven by market acceptance due to their competences.	remove clause	Amended to reflect comment, clause removed.
299-319	Closed	ge	The indirect benefits mention increased consumer trust and market access but do not address the risk of trade restrictions on exports from developing economies due to new sustainability requirements. Without a balanced approach, stringent transparency standards may disproportionately affect smaller economies that lack the capacity to immediately comply.	Include a mechanism for developing countries to transition without facing trade disadvantages, possibly through phased implementation or financial assistance. Solution Example: Give early adopters of transparency measures priority market access and establish a grace period for compliance. Special measures for developing economies should be included in international trade agreements so they have time and money to adapt without facing trade penalties.	Amended to reflect comment. Added to Recommendations section.
403 ff	Closed/Duplicate	te	It has not been demonstrated how UNTP fits to existing initiatives like the EU Digital Product Passport, The EU Battery Passport or similar initiatives.	Add explanations how this will fit together	Amended to reflect comment. Differentiation made between UN DPP and EU DPP.
403 ff	Closed/Duplicate	ge	UNTP uses GPL, mostly not acceptable for industrial companies to contribute.	Change to a permissive license with no copyleft.	Addressed, duplication from another contributor.

403ff	Closed	te	It has not been demonstrated how UNTP fits to existing initiatives like the EU Digital Product Passport, The EU Battery Passport or similar initiatives	Add explanations how this will fit together	Amended to reflect comment. Explanatory language has been included in the Annex section on UNTP.
415-419	Closed	le	The document suggests governments act as digital trust anchors but does not address legal frameworks and data sovereignty concerns for developing nations. The establishment of a universal digital trust framework may pose challenges in jurisdictions with differing data protection laws and weak institutional capacity to enforce digital security.	Recommend adding legal guidelines and case studies on implementing verifiable credentials within different legal systems. Example Solution: Create a multi-stakeholder framework that enables developing countries to implement adaptive compliance measures according to their level of technology and legal readiness. To ensure that regulations are adapted to national circumstances while maintaining the interoperability of international regulations, legal professionals from international organizations can provide technical assistance.	Amended to reflect comment.
421-422	Closed	te	Is it necessary to require national and regional issuers to change their credential formats?	Define required characteristics for a secured data model and enable the document to comply with any data model that meets the defined characteristics. For example, the document should define a credential profile that includes a minimum set of properties, like signatures, link to semantics repository, link to trust anchors...	Amended to reflect comments.
434, 627	Closed	te	Verifiable credentials. Supporting instruments must focus on ensuring the verifiability of claims and disclosures stored in decentralized systems.	<On line 434 is written that government entities and so forth: ...should issue registration documents as digital verifiable credentials. The question is: what happens when government entities do not issue verifiable credentials, but the framework for data transparency is built around verifiable credentials? See also comment on line 210.>	Amended to reflect comment, the defintion of Verificable Credentials was added in the glossary and their description improved within the text.

446-447	Closed	Ge	EB: Reference to “Customs authorities should issue… official documents… as virtual credentials” seems to me a WCO responsibility and I have doubt whether this would be anticipated as appropriate language for settling something like this with WCO (similar to SPS).	BH: Soften language relating what Customs authorities should be doing	Amended to reflect comment.
453-480	Closed	ge	The recommendation promotes industry adoption but does not consider the cost burden on SMEs in compliance and reporting. SMEs, which form the backbone of many developing economies, often lack the financial and technical resources to meet new transparency requirements. If implementation is too expensive, it may lead to market consolidation favoring larger corporations, reducing competition and innovation.	Propose subsidies, incentives, or regional cooperation frameworks to support SMEs in meeting transparency requirements. Solution Example: To reduce costs and improve collaboration, SMEs should create a shared digital compliance platform. Governments and business groups could collaborate to create a digital compliance hub where SMEs can receive technical assistance, share compliance costs, and access pre-approved templates. This would ensure broad participation and reduce barriers to entry.	Amended to reflect comment., language added.
51, 58	Closed	ed	Global Commerce	Global Trade <use much frequently in UN documents>	Amended to reflect comment. Replaced commerce with trade.
521-522	Closed	ge	EB: Language style for implementation adapted to recommendation style [BH: especially reference to comply’]	EB: Replace with: The following are basic principles that supporting instruments would need to fulfil for a successful implementation of Recommendation No. 49”	Amended to reflect comment.
534-538	Closed	ge	Global standardization should not only identify common principles across jurisdictions, but ensure compatibility with existing technical standards and avoid the creation of new ones.	Add a new section, or extend the global standardization based on the comment.	Amended to reflect comment.

567 ff	Closed/Duplicate	te	Governance must prevent any kind of vendor lock-in	Add "- ensure that no single company or stakeholder group exercises undue influence" This comment proposes a new bullet point in section 2.2.12	Addressed, duplication from another contributor.
567 ff	Closed/Duplicate	te	Governance must ensure "one organization – one vote"	Add "- ensure that no single company or stakeholder group exercises undue influence"	Addressed, duplication from another contributor.
567ff	Closed	te	Governance must prevent any kind of vendor lock-in	Add"- ensure that supporting instruments and used open standards are not leading to any kind of vendor lock-in to any participating party"	Amended to reflect comment. See table 2.2.2 for updated language.
609-618	Closed	ge	Insert a definition for the European Digital Product Passport (European DPP) – see next column. Then update the definition of the UNTP DPP in reference to the European DPP. Some suggestions in the next column also	According to the ESPR: The [European] digital product passport is an important tool for making information available to actors along the entire value chain and the availability of a digital product passport is expected to significantly enhance end-to-end traceability of a product throughout its value chain. Among other things, the digital product passport is expected to help customers make informed	Amended to reflect comment. Used input for definition in glossary.

633 ff	Closed/Duplicate	ed	Remove technical details to keep the document on a consistent level of details that is relevant for the target group	Remove 633…643	Addressed, duplication from another contributor.
633 ff	Closed	ge	The UNTP recommendation, in conjunction with the external sources referenced on page 25, states that it supports some W3C and ISO standards on unique identifiers, namely those dealing with the DID and with solutions that have been implemented in GS1 identifiers. What the recommendation doesn't state at all is the pertinent Identification Link standards IEC 61406, Part 1 (2022) and Part 2 (2024). Since the EC SReq requires a technology-agnostic DPP system, I think these IEC standards should also be considered by UNECE.	Include IEC 61406-1 (2022) and IEC 61406-2 (2024).	Based on multiple comments, UNTP is now included in an Annex as an example of a supporting instrument. Part II, Chapter II of the Recommendation provides design principles for supporting instruments.
633ff	Closed	ed	Remove technical details to keep the document on a consistent level of details that is relevant for the target group	Remove 633…643	Amended to reflect comme, with some modification. All mention of Verifiable Credentials has been moved to the Annex section on UNTP. In reponse to multiple comments, Part II, Chapter II of Recommendation 49 has been updated to a set of design principles that are technology agnostic.
677 ff	Closed/Duplicate	ed	Remove technical details to keep the document on a consistent level of details that is relevant for the target group	Remove 677..712	Amended to reflect comment. In reponse to multiple comments, PartII, Section II of Recommendation 49 has been updated to a set of design principles that are technology agnostic.
677ff	Closed	ed	Remove technical details to keep the document on a consistent level of details that is relevant for the target group	Remove 677..712	Amended to reflect comment, with some modification: In reponse to multiple comments, PartII, Chapter II of Recommendation 49 has been updated to a set of design principles that are technology agnostic.
692-694	Closed	te	Rewrite as follows for more accuracy	The footprint (e.g. carbon, environmental) of finished product is derived from the footprints of all the transformations of the product that took place during its lifecycle in the value chain"	Amended to reflect comment.

723 ff.	Closed	ge	UNTP is still very prominent and extensively explained in the entire document. Whilst UNTP is under development, the integration leads to unnecessary dependencies	Shift UNTP to an annex as a candidate	Amended to reflect comments.
767-768	Closed	te	Extension methodology defines that the UNTP common core is extended (with an 'is a' relation), without explicitly defining the common core or the boundaries that should be respected.The UNTP common core may present interoperability challenges with the EU DPP specifications. Although the UNTP offers extensions to facilitate the inclusion of national or industry-specificities, we are concerned that the common core could impose limitations on itself.A single, strictly defined core will not be compatible in all jurisdictions; therefore, flexibility is required.	Define the abstract common core, specifying the functional requirements that must be fulfilled by implementing profiles.The abstract common core should be focused on a minimum set of requirements to meet multiple sectoral/national legislations.Common core implementation details will construct a profile, where UNTP's current approach is a profile.	Amended to reflect comment.. UNTP has been moved to an Annex and PartII, Chapter II now focuses on a set of principles to guide supporting instruments.
Glossary	Closed	ge	The entry "sustainability" in the glossary rather explains the SDGs rather than sustainability in a value chain context that one would expect in a recommendation on sustainable global commerce. There is a footnote number at the end of the entry (as in several other entries of the glossary) with the corresponding footnote missing.	Replace by a sustainability definition that refers to the integration of environmental, social, and economic considerations into international trade and business operations. Delete footnote numbers or add footnote texts.	Amended to reflect comment. The definition included is "Sustainability in the context of value chains means that all activities, throughout a product's life cycle, take into account their environmental, health, human rights and socioeconomic impacts, and their continuous improvement."
	Closed	ge	Recommendations	Add recommendation on the need to prioritize, start with value chains / verticals where the largest impact can be expected.	Amended to reflect comment and added to the recommendations.
	Closed	ed	Make surveillance tools, including a Digital Product Passport (DPP) mandatory that is designed to carry sustainability information about each products' shipment at each step of the value chain.	Mandate surveillance tools, including a Digital Product Passport (DPP), designed to carry sustainability information about each product's shipment at every step of the value chain.	Amended to reflect comment.
	Closed	ed	They are open, available free of charge and with open participation in their maintenance.	They are developed and maintained collaboratively, without requiring specific hardware or proprietary software for their implementation, and are preferably available free of charge.	Amended to reflect comment.

	Closed	ed	Data should be held decentrally,	Data should be stored in a decentralized manner.	Amended to reflect comment. with some modification.
	Closed	ed	the data in a product passport	the data in a digital product passport	Amended to reflect comment.
	Closed	ed	to use them. .	to use them.	Amended to reflect comment.