

Compilation of comments received under the public review 20 October-20 December 2020 on Policy Recommendation:
Enhancing Transparency and Traceability for Sustainable Value Chains in Garment and Footwear

Date submission:	21 October 2020
Submitted by:	Ian Watt (NeXTRADE World Pty. Ltd.; UN/CEFACT International Supply Chain PDA)

Ref. (leave blank)	Draft version number	Line numbers	Type of comment ¹	Comments	Proposed changes	Working Group Observations (leave blank)
001		NA	ED/TE	The proposed ‘inset paragraph’ cross-industry value chain traceability that we could add at the front of the Policy/Recommendation document, to generalise the policy/Recommendation	Add: Whilst the textile and footwear traceability project benefitted from focussing on the use cases (AS-IS and proposed TO-BE) within the apparel industry the principles involved in addressing end-to-end traceability and support of the UN Sustainable Development Goals have application to the cross-industry value chains	Included in the box on the cover page

¹ Here and below, types of comments: ge = general; te = technical; le = legal; ed = editorial
(This document is inspired by the ISO/IEC/CEN/CENELEC electronic balloting commenting template/version 2012-03)

Date submission:	28 October 2020
Submitted by:	UNIC-ICEC (Maurizia Contu)

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
002		286	TE	“why quality? is that any link with traceability?”		Replaced “quality” with “composition”
003		289	TE	On “by disclosing the names and addresses of suppliers’ factories”: “This is impossible! The privacy of commercial sensible data has to be preserved.”		This is not a mandatory requirement; the Policy recommendation is only encouraging based on the already existing practices such as Open Apparel Registry (OAR) and Clean Clothes Campaign Transparency Pledge Comment; no action
004		315	GE	Sustainability of material is a very complex topic related to technical issues. Therefore we should be aware of the difficulties of introducing such an objective in this project.		Objective is support to R&D, not the actual sustainable materials. Comment; no action.
005		334-337	GE	“Key aspect!”		Comment; no action.
006		457	ED	“to be intended as unambiguous, univocal”		the suggested adjectives are covered by the word “unique”. No action.

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
007		NA	TE/GE	Table 2.1, row C2 Traceable asset, on the paragraph “A traceable asset can be transformed...”: having a unique (=unchangable) ID along the supply chain is very difficult. It is better to keep the connection of different IDs along the supply chain, if they change.		Addressed
008		465	TE	ISO/TS 17033 is the standard for ethical claims to be mentioned	Add mentioning of the ISO/TS 17033	Added a footnote: ISO/TS 17033:2019 Ethical claims and supporting information – principles and requirements.
009		504-505	TE/ED	the parallel for leather industry is tracking the single leather		Added “, or from a slaughterhouse a single-leather hide” after “a bale of cotton”
010		534	TE	every data that is to be tracked needs to be allocated to the product. As regards some aspects, specifically environmental ones, you cannot track generic system data referring them to the product without any allocation.		Added a sentence: “This information is linked to the unique IDs established for traceability and can be located by going back through the links in a value chains traceability system.”
011		NA	TE	Table 2.2 Traceability Information, on “Origin”: specify criteria: Origin of raw hides and skins is where the animal is slaughtered, origin of finished leather is where the substantial transformation phases are done (EN 16484)		Added “and/or other origin criteria” after “region”

Date submission:	20.10.2020
Submitted by:	Inditex

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
012		NA	GE	We suggest to include the roles and responsibilities expected to be held but the different stakeholders, group by activities: brands, retailers, manufacturers, certification bodies,		Roles of individual actors vary greatly depending upon circumstances; we would like to avoid being prescriptive in a high-level policy document. On the other hand, we will consider including such examples in the executive guide to be developed.
013		NA	GE	We think that it is necessary to clarify the meaning of claim. A claim does not have to be public, it can be a corporate objective or a legal requirement. Likewise, we suggest to reduce the use of sustainable claim in the policy and guidelines content and use just claim. There are a lot of claims that rely on traceability but are not related to a sustainable issue.		The word “sustainability” was removed where appropriate.
014		NA	GE	We suggest to be specific about the fact that the scope of traceability should embed the whole value chain, from fibre to final product, and from then until end-of-use and end-of-life. This is also very important taken into account		Covered by paragraph 12 (lines 143-146) and 27b (lines 283-287) No action

				<p>the legislation we are facing in Europe. Member States have to ensure separate textile waste collection by 2025 but no mandatory rules about how is going to be tackled have been issued. Textile collection might be done only by "authorized collectors" in each member state, to guarantee traceability of the textile and to achieve mainstream volumes of separate textile collection. The EU should establish controls and even "green lists" of collectors, sorters and recyclers outside the EU area to identify those companies within the textile industrial fabric with adequate recycling practices, correct environmental management of the waste generated by the process. recycling - avoiding landfill disposal, uncontrolled incineration, etc. Exports of post consumer textile by traders / intermediaries who cannot guarantee the final destination of garments might be banned. Traceability of sorting and final destination (reuse, recycling or others) might be guaranteed.</p>		
015		70-74	GE/ED	<p>We suggest deleting the negative adjectives and talk about impacts</p>		<p>Changed the wording to read: "Consumers, governments and civil society are demanding responsible business conduct and are calling upon the industry to identify and address actual and potential negative impacts in the areas of human</p>

						rights, the environment, and human health.”
016		89-95	GE/TE	To include all processes not only the ones included in the list, either the ones that are suppose to be labor intense		Added “such as” to stress that these are examples.
017		89-95	GE/TE	Could be interesting to hightlight that textile retailers rely on complex and global supply chains, with the vast majority of the textiles sold in the EU being produced in third countries.		Already covered by the paragraph 5, EU being a high-income region; in addition, the Recommendation is universal and cannot highlight specific regions (EU) No action
018		NA	GE/TE	The box with definitions: We suggest to complete this with something similar to: “And/or compliance with current policies by supply chain members”	Add: “And/or compliance with current policies by supply chain members”	Added “Traceability and transparency are important to ensure compliance with policies by value-chain participants” at the end of paragraph 8 (line 117)
019		439-443	GE	Due Dilligence: Could you please be more specific in this point? Does this mean that DD may include traceability requirements for all agents involved? (for example management systems, external certifications, ...)		Revised paragraph 40 to reflect the comment: “Value-chain actors in the garment and footwear industry need to perform due diligence and exercise responsible business conduct in order to ensure that their products or services are made or provided in a way that does not harm the environment or result in unacceptable social

						conditions including human rights violations.”
020		242-246	GE/ED	We suggest to be more specific about the concept of data privacy. Does this refer to a compliance point of view? Because could appear as opposite to transparency with the current wording.		Revised as follows: “Compliance with data privacy and security principles and regulations is a critical aspect, and is of particular concern for brands, traders, and companies in the high-value segment of the market who often consider information about specialized providers to be an important competitiveness factor.”
021		247-251	GE/ED	We suggest modifying the last sentence. We rely in current certification models, but we think they need to be evolved. So, we think that better than giving this example it would be to point out the importance to balance cost and control. In addition, talking about certified materials makes appear the reliability of other shared data less important.		Done; the paragraph revised as follows: “Quality data and controls have associated costs. At the same time, the credibility (and legal acceptability) of claims depend on the accuracy, reliability and authenticity of data shared as well as the strength of the controls validating materials, products and production processes, and the proofs showing compliance with sustainability requirements. As a result, value-chain actors need to carefully balance costs, data quality and controls in order to keep them all at acceptable levels.”

022		294-299	GE/ED	We suggest to delete the example given in the last sentence as we think that there is not a good one.		Sentence containing the example removed (lines 297-299).
023		344-349	GE	We suggest to include the recommendation that these commitments should be established after a dialogue involving industry stakeholders, as mentioned in bullet 28.		Replaced “Governments” with “stakeholders” in the line 345; the consultation with stakeholders is described in the previous paragraph (28).
024		NA	GE	<p>Guidelines: "1. We would like to add a general mention about the approach of the project to the logistics challenge (including transportation and customs), as we consider very important bearing in mind that the transport industry is also working on their own challenges about traceability, and not only for a focus on the retail and leather products, but with a general scope. It is also important to bear in mind that the rules and information shared differs between each model of transport, as well as the information shared when doing the customs clearance, and even may be different between countries.</p> <p>We should assure that our approach is fully aligned with all the traceability projects in the logistics sector, specially regarding the consolidated cargo, where non retail goods may be mixed with textile/leather ones... in such situation, the most common for SMEs, will unlikely be able to obtain the right</p>		Revised where appropriate.

				information, or the generation of IDs we're based on, unless we use the standards they're creating, or if we connect to the blockchain pilots the logistic industry is leading. We need to focus on the operational viability of the proposal, and we have big concerns that the approach followed in the Policy Recommendation is standing in a theoretical scenario, and we will face big issues when we need to move toward a operational phase."		
025		363-367	ED/TE	The importance of whom and how is well explained but we suggest to include explanation about the relevance of "when" and what is the time accuracy expected.		Added explanation in the first paragraph of the subsection "Events".
026		402-404	TE/ED	We suggest to complete the sentence with: "and other risks the agents may need to address"	Add "and other risks the agents may need to address" after "In order to maximise impact and make the best use of limited resources, traceability systems should be focussed on where there are risks of non-sustainable practices"	Added.
027		444-446	ED/TE	We suggest to complete the sentence with: Or the criteria that need to be traced (or to delete sustainability and leave just claims)	"Traceability systems can support sustainability claims " complete the sentence with: Or the criteria that need to be traced (or to delete sustainability and leave just claims)	Removed the word "sustainability".
028		447	ED/TE	Same comment as the previous one		Removed the word "sustainability" in the lines 448 and 458

029		461-462	ED/TE	Have a verification process, carried out by auditors: We suggest deleting this and include other options as we consider that not all the verification processes rely on auditors.		“Carried out by auditors” replaced with “preferably carried out by third parties”
030		NA	GE	Table 2.1. Summary of key traceability system concepts On C3. Logistics unit See comment 024		Revised accordingly.
031		NA	ED/GE	Table 2.1. Summary of key traceability system concepts Under C8. Verification process, on “Verification is “confirmation of a claim, through the provision of objective evidence, that specified requirements have been fulfilled”. ¹⁴ In the context of traceability, the verification process is carried out by a verification (audit)...” We suggest to delete the word (audit) as verification body is enough.	Remove “(audit)”	Removed.
032		465-487	GE	Move the approach from sustainability claims forward to just claims whenever possible.		Revised where appropriate.
033		546-553	GE	See comment 024		Revised where appropriate.
034		NA	GE	Table 2.2. Traceability Information See comment 024		Revised where appropriate.
035		NA	GE	Table 2.2. Traceability Information We miss sustainability information related to circularity		This is covered by information on product composition and the “Waste/end of life” under environmental information.

036		574	GE	Please specified what means facility in this context. In our understanding a facility is a company (party) that can encompass several location (location).		Facility is a production site, not a company. See definition under “Unique ID” No action
037		673-674	TE/GE	For this purpose, the minimum information to be associated needs to be established.		The guidance on minimum set of information to be provided is included in the Table 2.2. No action.
038		701-702	ED/TE	On “for claims about processes or organizations (for example, no use of child labour)”: Please indicate that the traceability models that are explained below are related mainly to sustainable fiber claims or other commodities like green electricity. They are not suitable to trace processes and organizations.		The traceability models apply to any type of known product characteristic including those related to processes and facilities / organisations No action.
039		743-756	GE	We would like to share our doubts related to mass balance as traceability model. For us ir more that a trace asset is related to		Noted. However, it is not always possible to apply other models. No action.
040		798-810	GE	We consider that the need for timestamp "requirements" is no necessary and if we agree it is, needs further explanation		Added a footnote: “The event time, and optionally the time zone, for all relevant activities through all stages of the product’s life cycle” to explain “timestamp”.
041		816-822	GE	Transporte: Bad example for an entry/exit point (ports and customs)		The example is made simple on purpose.

						No action.
042		823-829	GE	We consider that this is not a good example because it is very simple (one shark has a determined number of fins). But in garment manufacturing the entry will be xx meters of fabric that can be cut and result in yy number of pieces of fabric to be assembled to the final garments. In addition, the leftovers of this cutting process need to be traced for circularity purposes. So we think that it is better to include this type of examples.		Example replaced.
043		848-854	GE	We miss any reference to additional verification methods: - For trace makers, non-audit third party is involved but technical analysis needs to be conducted. - Block chain technology may need or not the additional verification processes.		Added “testing for” before “physical markers”.
044		860-871	GE	On paragraphs 99/100: We suggest talking about audit in general and not about audit agency (the audits can be conducted internally)		Word “agency” removed where appropriate.
045		890	GE	We suggest to indicate that both risks has to be assessed but not at the same time in the same certificate.		Removed “both environmental and social”; the focus of this point is using scientific basis for evaluation.
046		892-893	GE	Ok, but just if we are tracing materials		Noted. No action.
047		NA	GE	We would like to confirm that we fully agree with the approach that social and		Noted.

				<p>environment risks need to be taken in consideration. For that reason, a unified criteria to measure product's sustainability performance (social and environmental) is key to trigger sustainable consumer choices. The industry has already worked on existing standards to manage its global supply chains and consider both environmental, chemical and social impact (e.g. the Higg Index, ZDHC), and it is willing to collaborate with policymakers continue to advance this process.</p> <p>At Inditex we welcome the European Commission's ambition to define a Product Environmental Footprint (PEF) methodology and a LCA simplified approach, as a tool to substantiate green claims. We are convinced that a common methodology based on leading industry standards can accelerate the transition towards more sustainable products.</p> <p>Nowadays there are not enough LCA data to build private labelling schemes based in LCA (under the PEF work we have requested to the EC for more than 800 missing LCA). So the only option in the interim intermediate period, is to sustain the green claims on third party certifications such as the Textile exchange standards.</p> <p>Claims about social sustainability must also be substantiated. We consider appropriate to address social aspects</p>		No action.
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				through the product lifecycle as part of sustainability principles and requirements. We support the development a new cross-sector standard methodology to calculate social performance and impacts .This methodology would build on al-ready existing data capture systems such as the SLCP. We must focus our efforts on promoting common methodologies, as a basis for transparency, both in the measurement of environmental impact and in the measurement of social impact in a cross-sector comparable way. The different tools that can be used to implement the methodology should be freely adopted, chosen, developed by each agent.		
048		918-924	GE	We consider that it is necessary to define what is the meaning of cost estructure. We do not understand it.		Replaced “structure” with “allocation”
049		948-949	GE	Custom clearance: are you refering toinclude traceability aspects in current systems like (AEO)?		The measures of facilitating customs clearance based on traceability are decided by each Customs administration and they may or may not involve AEO.
050		957-959	GE	We agree with last sentence but we suggest to also appoint that duplicities are a risk that need to be managed.		This paragraph is about incentives; there are other paragraphs on management of risks. Apps being simple and easy to use is not necessarily making it easier to cheat.

						No action.
051		972-1028	GE	On section E. Supporting role of advanced technologies New tech by themselves are not enough to fulfill traceability challenges. We suggest to appoint this in more detail		The section stresses the advanced technologies only have a supporting role. No action.
052		1072-1099	GE	On “2. Gender considerations”: We are aware and agree with the relevance of this issue but we consider that it is better to include it in a more strategic issue related to discrimination: gender, migration, etc...		Gender needs to be a separate issue in order to show the relevance of this work to the SDG 5. No action.

Date submission:	17.11.2020
Submitted by:	Carrie George / Everledger

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
053		265	GE	in the challenge section, there should be a mention of circular economy challenges, not just due diligence	There are limitations in meeting circular economy goals without traceability and full lifecycle management include aggregation of scrap material, resale of product, and full recycling of end-of-life products.	Added a paragraph under subsection “Challenges”

Date submission:	21.11.2020
Submitted by:	Paul Roeland / CCC

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
054		461	GE	“carried out by auditors” suggests too strong this should be “social auditing firms”, which have come under increased criticism. It also limits, as Table 2.1 correctly defines Verification agencies broader, including ministries, or PPPP. Replacing the subsentence with just “independent” in the main part, is more neutral. Table 2.1 provides definitions.	Have an independent verification process, which verifies that....	The text changed to read: “ Have a verification process , preferably carried out by third parties, which verifies that the data collected are accurate, aligned with the verification criteria and support the claims.”
055		778	ED	unless I don’t understand the method, I think the claim should be 25% sustainable, with 100 kg sust. vs 300 kg unsust	in the image: “Claim 25% Sustainable”	Figures are correct. Added text to explain the Figure 2.6

Date submission:	08.12.2020
Submitted by:	Emily Franklin / Fashion for good

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
056		277- 278	TE	Will this be linked to the latest update from the EU on non-financial reporting?		This is a global and not regional document. No action.

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
057		288- 291	TE	Which organisation do you propose takes ownership of this? There are a lot of NGOs working in this space e.g. OAR.		It is not the role of UNECE to assign responsibilities to actors. No action.
058		976	TE	you could more broadly say 'physical tracer technologies' - there are isotopic tracers, fluorescent tracers among others that should be equally represented in this document.		Added "physical tracer technologies"
059		992	ED		Add "of" after "use"	Addressed.
060		NA	TE / ED		Table 2.3. List of advanced technologies that can support traceability and transparency, Column 1: move "Product DNA labelling" after "Near-Field Communications (NFC) labels" Add: "Optical fingerprint markers" at the end Add a row: Column 1: "Isotopic and microparticle analysis" Column 2: "Matches the microparticles present in a commodity with those present in a soil sample of a particular region. This technology is useful for verifying origin of a natural fibre in the textile industry."	Replaced "Product DNA labelling" with "Physical tracer technologies".
061		NA	GE	Box 2.3, on the word "pilot" in the title: If you want an example of a completed project for traceability, I am happy to		This would be more appropriate for a policy brief that is still under development.

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				provide a blurb on our Organic Cotton Traceability Pilot as well!		No action.
062		NA	GE	Table 2.4. Matrix of criteria for selecting technology-based solutions tools for traceability On “Technology solutions that do not create “lock-ins” which make it difficult to change systems or suppliers” (last row): You may also want to include that digital platforms, such as blockchain, should be physical tracer agnostic meaning that they can incorporate any physical tracer onto the platform.		It is covered by the text on the right side and the paragraph following the table where it refers to not specifying the use of any particular technology. No action.

Date submission:	11.12.2020
Submitted by:	J. David Raja, Expert-UN/CEFACT

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
063		221	GE	Adoption of Operation Technology to connect the legacy manufacturing assets and cloud based data analyst application to acquire shop –floor insides are increasing providing the basics for fast and accurate day to day decision making increased use of simulations tools is	Adoption of Operation Technology to connect the legacy manufacturing assets and cloud based data analyst application to acquire shop –floor insides are increasing providing the basics for fast and accurate day to day decision making increased use of simulations tools is	This is not directly related to traceability or transparency for sustainability data. No action.

				giving entrepreneurs the power of experimenting with alternatives and select what is most beneficial, both for product design as well as for manufacturing process	giving entrepreneurs the power of experimenting with alternatives and select what is most beneficial, both for product design as well as for manufacturing process	
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Date submission:	14.12.2020
Submitted by:	Secretariat

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
064		5	ED	“What happened with the discussion about changing the title to “Traceability and Transparency””	Swap “Transparency” and “Traceability”	Done
065		5	ED	“This should really be ”in” and not “for””	Replace “for” with “in”	No action.
066		9	ED	Same as comment above	Swap “Transparency” and “Traceability”	Done
067		9	ED	Same as comment above	Replace “for” with “in”	No action.
068		67	ED	Same as comment above	Swap “Transparency” and “Traceability”	Done
069		67	ED	Same as comment above	Replace “for” with “in”	No action.
070		75-76	ED/TE	I don’t think it is enough to only say that companies can better “manage” human	Add “and reduce” after “manage”; replace “before “and” with “as well as” before “address”:	No action.

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				rights violations, adverse environmental impacts, etc.	“By creating enhanced visibility in value chains, companies are better equipped to manage and reduce such impacts, as well as address financial, operational and reputational risks.”	
071		84	ED	« high, low and middle-income » already includes ALL countries (including those with transition economies), so you cannot say “as well as” since that would mean “and in addition”	Replace “as well as” with “including”; add a comma after “in transition”: “High, low and middle-income countries, including those with economies in transition, are deeply...”	No action.
072		110	ED		Add “their” before “fibres”: “8. In this context, downstream actors must increase their knowledge of where their fibres...”	Done
073		112	ED	«actual» in French means «current» but it English, in this context, it means their “real” capacity (as opposed to claimed capacity) which is not what I believe you want to say	Replace “their actual” with “the current”	Addressed.
074		112	TE	It is both upstream and downstream actors, not just downstream	Add “of both downstream and upstream actors” The text will read as follows: “At the same time, there is clear evidence that the current capacity of both downstream and upstream actors to perform...”	No action.
075		119	TE	« guarantee » is a really strong term and there is always someone who figures out how to cheat	Replace “guarantee” with “also support”	“Guarantee” replaced with “support”

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
076		121	ED		Add “:” after “that”; add “use of” before “new resources”; remove “used”: “...towards circular economic models that: Reduce the use of new resources, Reuse products...”	Replaced.
077		NA	ED	On the box with definitions: “If the entry on «circularity» in the box below is a quote, put in the quotation marks and take out the change I made. Also for the entries on “transparency” and “sustainability” – if they are quotes put in the quotation marks”		These are definitions compiled from the respective sources, but not exact quotes. No action.
078					On the box with definitions, Circularity, replace “such” with “the”: “Circularity of a production process refers to the ability of the process...”	Done.
079		128	ED		Replace “entailed by” with “resulting from”: “...people and the planet resulting from corporations...”	Done.
080		129	ED		Replace “,” with “.” before “Thus”	Done
081		129	ED		Add “s” at the end of “imbalance”	Done
082		129-130	GE/TE	On “Recommendation aims at reducing the imbalances between upstream and downstream actors”: I am not at all convinced that the recommendation does this. It actually puts even more decision power in the hands of downstream actors by giving		No action.

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				them full transparency into supply chains and thus allowing them to dictate conditions in sub-contractors – This may be a good thing, but it definitely does not reduce imbalances.		
083		130-131	ED		Add “the” before “empowerment”	Done
084		168	ED		Remove a comma after “take action”	Done
085		231	ED		Replace “which” with “to”	Done
086		252	ED	The next paragraph also starts with “In addition” making it too repetitive.	Remove “In addition” at the beginning of the sentence.	Done
087		253	TE/ED	Data entry and product labelling are the foundations of traceability and then the other validation activities come on top of that – not the other way around	Replace “aimed at” with “for data entry, product labelling and”: “...and technologies for data entry, product labelling and performing various...”	Done
088		254-255	TE/ED		Remove “and related data entry and product labelling” after “value chain”	Done
089		256	ED		Replace “Technological advances” with “Technologies”	Done
090		259	ED	Supply chain when used as an adjective as in “supply-chain actor” should be hyphenated	Add a hyphen “supply-chain”	Done
091		269-270	ED	This is better English than “act in the following action areas”	Replace “...that Governments “act in the following action areas:” with “...that Governments take action in the following areas to:”	Done

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092		295	TE	On “UN/CEFACT standard”: There is more than one now and the correct names should be put in a footnote (they are too technical for the main text)	Add “s” at the end of “standard”	Done
093		296	TE		Add a footnote after “garment and footwear” with the name of the standards that are out for public review	Added a link to the page with BRSs
094		325-331	ED		You might want to rethink the numbering because i) meaning 1 under i meaning the letter i looks strange	Will be checked with the editor
095		353	ED	“What happened with the discussion about changing the title to “Traceability and Transparency””	Swap “Transparency” and “Traceability”	Done
096		353	ED	“This should really be “in” and not “for””	Replace “for” with “in”	No action.
097		365	ED	Added this to cover the 5 Ws	Add “, with what inputs” after “how”: “...where, by whom, how, with what inputs and when the product is made.”	Done
098		368	ED		Change font to italic for the word “ecosystem”	Done
099		370	ED		Change font to italic for the word “ecosystem”	Done.
100		403	ED	There are « risks » in everything, so focusing on everything with a risk would mean not “focusing”	Add “the greatest” before “risks”: “...where there are the greatest risks of...”	Done
101		418	ED		Add a comma before “or”; remove “a” before “groups” “in order for assets, or groups of”	Done.

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
102		428	ED		Remove “a” before “key”; add “s” at the end of “factor”: “...traceability are key enabling factors.”	Done.
103		430	ED	Just to avoid using « support » twice in the same sentence (with two different meanings) and three times within two adjacent sentences.	Replace “support must also be” with “assistance should be”	Done.
104		459	TE/ED		Split the bullet point by adding a paragraph and “• Identify the events where data must be collected” before “as the traceable assets”	Done.
105		NA	ED	Table 2.1 Summary of key traceability system concepts Why did we put “C” in front of these numbers? I would just put the numbers	Remove Cs before numbers in the table	Done.
106		NA	ED		Table 2.1 Summary of key traceability system concepts, Row C4. Identifiers (IDs), paragraph 5: add “s” at the end of “input”; remove “quantities”: “(to be sure it matches the inputs)”	No action.
107		NA	ED		Table 2.1 Summary of key traceability system concepts, Row C5: add “.” After “C5”	Done.
108		NA	TE		Table 2.1 Summary of key traceability system concepts, add a row, where the first column would read: “C6. Events <i>At which points are data collected in the value chain?</i> ” and the second column would read:	Done.

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
					“Events are those significant activities where data needs to be collected. Depending upon the activity/event, data collection may take place just before or just after the event, or at both times. It is important to identify events in order to put in place the infrastructure for collecting data. The most common classification of events is explained further below.”	
109		NA	ED		Table 2.1 Summary of key traceability system concepts: replace C6 with C7	Done
110		NA	ED		Table 2.1 Summary of key traceability system concepts, row “Entry and exit points”, second column, second sentence: Add “two” before “points”: “At each of these two points”	Done
111		NA	ED		Table 2.1 Summary of key traceability system concepts: replace C7 with C8	Done
112		NA	ED		Table 2.1 Summary of key traceability system concepts: replace C8 with C9	Done
113		NA	ED		Table 2.1 Summary of key traceability system concepts, last row: replace “supply” with “value” in the second bullet point	Done.
114		503-511	ED	This duplicates the text in paragraph 76 and this level of detail about the traceability models belongs in 76, not here	Remove: “The most appropriate traceability model will depend upon:” and the lines 504-511.	Done

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
115		531	ED		Add “from” before “bales”	Done
116		540	ED		Add a hyphen in “value chain”; remove “s” from “chains”; Replaces “outlines” with “outlined”	Done.
117		544	ED		Add “a” before “value chain”; add an apostrophe after “chain”; add “a” before “valuable”; remove “s” from “tools”: “Risk-based analyses of a value chain’s impacts are a valuable tool for identifying key...”	Done
118		551	ED	The original, “enhanced use by data management” makes no sense in English. If someone could tell me what they wanted to say, maybe I could fix it.	Replace “enhanced use-by data management” with “improved management of suppliers”: “...greater stock rotation, improved management of suppliers, reduced shrinkage and...”	Replaced with “enhanced management of suppliers”
119		554	ED		Replace “to be” with “that are typically”	Replaced with “that are collected”
120		558-559	ED		Remove lines 558-559	Done
121		NA	TE		Table 2.2 Replace “Sustainability related information” with “Sustainability-Related Risk Information Areas”; add text as follows: “The list below shows risk areas about which information may need to be collected.	No action Added “Information about many of these risks can be obtained through either certifications or inspections.” No action

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
					<p>Information about many of these risks can be obtained through either certifications or inspections.</p> <p>Information to collect regarding certifications and inspections is shown in the last section of this table. Other risk information varies widely, depending upon the risk and availability of data, some examples are underlined in the table below.”</p>	
122		NA	TE		<p>Table 2.2 Rename the subheading row: “Environmental Risk Areas”, “Human Rights and Labour Risk Areas” and “Health and Safety Risk Areas” respectively</p>	<p>Rename “Environmental related information”, “Human Rights and Labour Risk related information”, “Health and Safety related information”, Ethics related information”</p>
123		NA	TE		<p>Table 2.2 First column row under “Environmental Risk Areas”, replace text as follows:</p> <ul style="list-style-type: none"> • Hazardous chemicals • Pesticide and fertilizer use • Water use • Water pollution and wastewater management • Solid production waste • Air Pollution • Greenhouse Gas (GHG) emissions <ul style="list-style-type: none"> - Direct GHG emissions - Transport CO2 emissions • Use of non-renewable energies 	<p>Replaced with:</p> <ul style="list-style-type: none"> Hazardous chemicals Pesticide and fertilizer use Water use Water pollution and wastewater management Waste production and management End-of-life → <ul style="list-style-type: none"> - Durability - Recyclability - Reusability Air pollution

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
					<ul style="list-style-type: none"> • Soil degradation • Deforestation • Biodiversity and ecosystem depletion 	Greenhouse Gas (GHG) emissions→ - Direct GHG emissions - Transport CO2 emissions Use of non-renewable energies Soil degradation Deforestation Biodiversity and ecosystem depletion
124		NA	TE		Table 2.2 First column row under “Environmental Risk Areas” add two cells: 1) Product-Claim Related Risk Areas 2) <ul style="list-style-type: none"> • % Organic content • % Natural fiber content • % Recycled content • % Recyclable content • Biodegradability of product 	Done
125		NA	TE		Table 2.2 Second column row under “Human Rights and Labour Risk Areas”, replace text as follows: <ul style="list-style-type: none"> • Child labour • Forced/compulsory labour • Sexual harassment • Discrimination (women & minorities) • Exploitation of home workers • Working Conditions <ul style="list-style-type: none"> - Wages - Working times 	Replaced with: Child labour Forced / compulsory labour Sexual harassment Discrimination (women and minorities) Exploitation of home workers Working conditions → - Wages - Working times - Contracts (with workers and/or sub-contractors)

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
					<ul style="list-style-type: none"> - Contracts (with workers and/or sub-contractors) - Temporary employment • Trade unions and collective bargaining rights • Lack of social security 	<ul style="list-style-type: none"> - Temporary employment Trade unions and collective bargaining rights Recruitment practices Lack of social security
126		NA	TE		<p>Table 2.2 Third column row under “Health and Safety Risk Areas”, replace text as follows:</p> <ul style="list-style-type: none"> • Unsafe workplaces and work practices • Inadequate Personal Protective Equipment (PPE) 	Done
127		NA	TE		<p>Table 2.2 First column row under “Environmental Risk Areas” add two cells:</p> <ol style="list-style-type: none"> 1) Ethics 2) <ul style="list-style-type: none"> • Bribery and corruption • Land rights & community welfare • Animal welfare 	Done
128		NA	TE		<p>Table 2.2 Last but one row, replace as follows: “Sustainability Certificates or Inspection Reports (information about)”</p>	Done
129		NA	TE		<p>Table 2.2 Last row, replace as follows:</p> <ul style="list-style-type: none"> • Certificate Type • Certificate ID • Issue and expiry dates • Issuing agency ID (optional: name & address) 	No action

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
					<ul style="list-style-type: none"> Standards certified/inspected for (for example, environmental management standards) Claim, and is Claim approved or not Additional data (may include copy of actual certificate or inspection report) 	
130		590	ED		Replace “supply” with “value”	Done
131		617	ED		Add “in order” before “to perform”	Done
132		632	ED		Remove “and” after “goods”	No action
133		636	ED		Replace “the” with “a”	Done
134		653	ED		Remove “the identification of”	Done
135		668	ED		Remove “and”; replace “occur” with “occurred”	Done
136		NA	ED		Box 2.1 In “Chain of Custody”: Replace “supply” with “value” before “chains”	Done.
137		671-686	TE/ED	This is a duplicate of paragraphs 71 and 72 and I believe its location before the box is better than after it.	Remove lines 665-670 and 671-686	Done.
138		708	ED		Add “to ensure that” after “objective is”	Done
139		738	ED		Replace “supply” with “value”	Done

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140		740	ED		Replace “supply” with “value”	Done
141		747	ED		Replace “supply” with “value”	Done
142		774	ED		Remove “then”	Done
143		792	ED		Remove “in” before “in”	Done
145		NA	TE		<p>After the line 793 add the text as follows:</p> <p>6. Events Events are those activities where data is collected. Depending upon the activity/event, data collection may take place just before or just after the event, or at both times. This is determined, in large part, by the type of traceability event. The most common classification of traceability events is as follows:</p> <ul style="list-style-type: none"> • Aggregation [disaggregation] events: traceable assets are put together into a logistical unit or other traceable asset or are removed from a logistical unit or other traceable asset. For example, assets 1,2 and 3 are packaged onto pallet C [aggregation] and, later, asset 1 is removed from pallet C [disaggregation]. <p>In the case of aggregation there are input IDs (for assets being aggregated) and a unique ID for the aggregated total. In the case of disaggregation, the ID(s)</p>	Added

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					<p>of the “input(s)” removed from the aggregation total (with its ID) need to be registered.</p> <ul style="list-style-type: none"> Transformation events: Traceable assets are often inputs to a process that transforms them into a new traceable assets. For example, spools of thread that were assets with the IDs1, 2 and 3 are inputs to a process that weaves a new traceable asset: a fabric roll that has an ID X Transaction events: The traceable assets are associated with a trade transaction. For example, assets with IDs 1, 2 and 3 are used to fulfil a purchase order (or contract) with the ID X Object events: These are where traceable asset(s) participate in an event, that is not an aggregation, transformation or transaction event. For example, assets with the IDs 1,2 and 3 are transported by a truck with the ID A, or they are stored in warehouse that has the ID B. <p>It is important to identify events in order to put in place the infrastructure for collecting data.</p>	
146		794	ED		Replace “6” with “7”	Done
147		805	TE		Replace “location” with “event”	Done

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
148		807	TE		Replace “activity” with “event”	Done
149		812	TE		Add “/events” after “activities”	Done
150		830	ED/TE		Replace “7” with “8”	Done
151		847	ED/TE		Replace “8” with “9”	Done
152		856	ED		Add a comma after “a claim”	Done
153		NA	ED		Box 2.2: Paragraph 1, line 4: add a hyphen “Open-Source” Line 6: add a hyphen “Open-Source”; add “a” before “variety” Paragraph 2, line 1: add a hyphen “open-source”	Done
154		1001	ED		Add “by” before “open innovation”; add “by” before “open-source”	Done
155		NA	ED		Table 2.3 List of advanced technologies that can support traceability and transparency Row “Blockchain”: add a “.” after “of data”; add “the” before “textile sector”	Done
156		1039-1040	ED		Remove “should also be approached since they” after “Policymakers”; add and replace as follows: “support inclusiveness by playing” after “can”	Replaced with: “Policymakers can play a catalytic role by supporting coordinated action through the establishment of multi-

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						stakeholder and multi-sectoral initiatives, including to facilitate the sharing of good practices and lessons learned in other high-risk sectors such as agri-food, timber and minerals.*
157		1048	ED		Add “, other,” after “stakeholders and”	Done
158		1065	ED		Replace “supply” with “value”	Done
159		1113	ED	The original “is proposing the use the traceability approach taking into...” makes no sense in English	Replace as follows: “...UN/CEFACT is proposing that the implementation of traceability take into account the different...”	Done
160		1126	ED		Remove “en” before “register”	Done
161		1153	ED		Remove “and” before “acknowledged”	Done
162		1156	ED		Replace “for” with “to support” before “traceability and transparency”	Done
163		1159	ED		Replace “comprises” with “includes”	Done
164		1174	ED		Replace “setting” with “designing”	Done
165		1204			Inserted “+”	No action

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166		1214	ED		Add “have” after “in order to”	Done
167		1231	ED		Add “m” after “who”	Done
168		1246	ED		Replace “of” with “in” after “transparency”	No action
169		1260	ED		Replace a semicolon with a “.” after “updated”. Start a new sentence with “Communicating”	Done
170		1270	ED		Replace as follows: “coordination among actors in our value chains...”	Done
171		1272	ED		Replace “supply” with “value”	Done
172		1276	ED		Add a comma after “next year”	Done
173		NA	ED		After line 1327, in the figure “Examples”: Under 2.1: correct the words “characteristics” and “throughout” Under 2.2: add an apostrophe after “suppliers” Under 4.2: replace “supply” with “value” Under 4.3: replace “supply” with “value” Under 7.1: add a comma after “technologies”	Done
174		1332	ED		Replace as follows:	Done

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
					“20. In addition to supporting product claims, enhanced traceability and transparency in value chains also allow more informed...”	
175		1336	ED		Remove a space before the full stop	Done
176		1336	ED		Add “may” before “concern”	Done
177		1356	ED		Remove “the” before “internal”	Done
178		1456	ED		Replace “supply” with “value”	Done
179		1483- 1486	TE/ED	I have tried to re-draft in order to make this more understandable to non-IT people.	Replace as follows: “UN/CEFACT Core Component Library is a registry/repository in which Core Components are stored. Core components are data definitions which are structured in order to be unambiguous and readable by computer systems. The Core Component Library contains definitions for all the Core Component Types, Basic Core Components, Aggregate Core Components, Basic Business Information Entities and Aggregate Business Information Entities. For a more technical description refer to the Core Components Technical Specifications version 2.01.”	Done

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					After the paragraph add a footnote: https://unece.org/core-component-technical-specification	
180		1487- 1488	TE/ED	Cannot find any reference to UMM or modelling in the document – but am leaving this as general information about UN/CEFACT tools		Done
181		1492- 1495		There is no reference to “use case” in this document, so no need to have this in the glossarymodellin	Remove the lines	Done
182		1505- 1512		There is no other reference to XML in this document, so no need to include it in the glossary	Remove the lines	Done

Date submission:	15.12.2020
Submitted by:	Secretariat

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
183		467	le	I suggest adding the definition of sustainability claims after the definition of claim.	“A sustainability claim is a claim that covers one or multiple sustainability dimensions (economic, environmental, social).”	Done
184		470	le	When developing sustainability claims consider the whole product life cycle.	I suggest adding the following text:	The points are valid, but the text is needs to be more concise and the part on

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
				<p>Hotspots analysis approach to identify the impacts within a product life cycle.</p> <p>Less data needed to be collected with the result also to allow SMEs to adopt a life cycle approach.</p>	<p>“Sustainability claims should consider, in a holistic perspective, the whole product life cycle, from raw material production to consumption and post consumption, and clarify the benefit or improvement that contributes to the sustainability hotspots of the product or specify which aspect of the product life cycle the benefit or improvement is related to. The identification of sustainability product’s hotspots assures to collect only the data needed to determine and communicate the sustainability information related to the hotspots. The reduction of data to be collected facilitates the adoption by SMEs of a life cycle approach.</p> <p>The development of harmonized common criteria, with an inclusive multi-stakeholder involvement, to ensure transparency, reliability and credibility of sustainability claims will build trust and show the way to sustainability to consumers and businesses. It will create the basis for equal and fair trade by making it possible for products to compete on a level playing field in the marketplace. The harmonized</p>	<p>verification criteria should be in the section on verification criteria. As a result, the following two changes are being made. the following text is inserted at line 470 after the words “due diligence.” and the current last two sentences of the paragraph are moved into a separate paragraph. “The aforementioned value-chain risk analysis should identify sustainability hotspots, taking into consideration the entire product life cycle - from raw material production to consumption and post consumption. When selecting claims to be made, these hotspots should be taken into account and the benefits from the claims clearly identified vis a vis both sustainability hotspots and life cycle phases.”</p> <p>The following text is inserted in the section on verification criteria immediately after line 846.”</p>

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					common criteria should be evaluated and reviewed, if necessary, through a collaborative approach and multi-stakeholder consultations.”	Verification criteria should be developed through inclusive multi-stakeholder involvement, to ensure the greatest transparency and credibility of the resulting sustainability claims to consumers and businesses. This process is described in more detail in Annex 1. Harmonized, common verification criteria, for example, across an industry, can reduce overall costs and provide a better basis for equal and fair trade in the marketplace; especially when claims are related to regulatory requirements or established industry norms for sustainability.”
185		470,471,472,473	le	I suggest moving these two sentences after the examples of sustainability claims in a new paragraph (after 46 and before h 47) related to the general requirements to be met by sustainability claims <i>“The contents of the claim should be accessible and may need to comply with legal requirements. Also, organizations that develop sustainability standards and</i>		After review it was decided to leave these two sentences where they are but in a separate paragraph 45 (see above) and to change the word “accessible” to “easily understood”

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				<i>guidelines often have rules about how they can be referenced in claims.”</i>		
186		After 487 and before 488	le	I suggest adding after paragraph 46 a new paragraph on requirements to be met by sustainability claims based on the analysis of various documents (ISO Standards, different Guidelines, EU Unfair Commercial Practice Directive and related Guidance, among others)	<p>I suggest adding the following text:</p> <p>“In order to protect consumers from misleading claims and ensuring a level playing field for businesses, sustainability claims should be accurate, relevant for the sustainability performance of the product and for consumers to drive more sustainable purchasing decisions, substantiated with appropriate evidence according to the type of claim being made and verifiable by third parties. <i>The content of sustainability claims should be accessible and may need to comply with legal requirements. Also, organizations that develop sustainability standards and guidelines often have rules about how they can be referenced in claims. (part already included in the Guidelines but in line n. 470.)</i></p> <p>Sustainability claims should go beyond regulatory requirements of the production country and of the consumption country and could implement the engagement of</p>	<p>Taking into account these points, the following three short paragraphs were inserted immediately before line 488</p> <p>““Sustainability claims should go beyond the regulatory requirements of the production and consumption countries. When feasible, they should also encourage consumers to have a more active role in reducing the negative impacts of products on the environment and society. In order to protect consumers from misleading claims and ensure a level playing field for businesses, sustainability claims should be accurate, relevant to the sustainability</p>

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					<p>consumers encouraging them to have an active role in reducing potential negative impacts of products on the environment and society.</p> <p>The documentation that supports sustainability claims should be disclosed to consumers and all stakeholders, with the exception of confidential business information and other legally restricted information, to allow to trace how sustainability claims were produced and to assess the quality of the information.”</p>	<p>performance of the product and provide information that allow consumers to make more sustainable purchasing decisions.</p> <p>With the exception of confidential business information and other legally restricted information, the documentation supporting sustainability claims should be easily available to consumers and all stakeholders and be presented in a way that allows them to assess the quality of the information.”</p>
187		487	LE	<p>On examples on claims I suggest modifying the examples and have one claim on organic cotton and another claim on recycled content and reduce use of resources</p>	<p>1 Example of sustainability Claim</p> <p>“(From Brand Y) The cotton of this shirt contains at least 95% per cent of organic cotton certified against (XYZ standard) by a third party certified (Y Certification Body) for</p>	<p>Done with some minor language edits and the integration of one claim from table 2.5</p>

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					<p>ensuring responsible business conduct”</p> <p>2 Example of sustainability Claim</p> <p>“(From Brand X) The fabric of this denim is made from 40% recycled cotton certified by (YXZ standard) and is finished with a new process that uses 60% less water than our previous fabric against the YYY standard for reduced environmental impact”</p>	
188		1099	LE	I suggest removing the examples on gender equality because we don’t provide examples on each type of claims. We could probably explore the different types of claims in specific guidelines on claims in the garment and footwear sector that could be developed in a separate document as part of the project in order to support companies in making their claims	Delete table 2.5	Deleted table 2.5 and the sentence “Some examples of gender-related claims are given in table 2.5.” (line 1089)

Date submission:	20.12.2020
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Submitted by:	Secretariat
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Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
189		310	GE/LE	Since all the measures indicated in Section F, paragraph g (ii) (iii) (iv) are related to sustainability and/or circularity of production processes we believe this sentence should be moved at the beginning because of its overarching nature	We suggest moving the following text “for advancing the sustainability and circularity of production and consumption processes through” after the sentence in Section F, paragraph g after (i) Support research and development, and identify and scale-up innovative solutions:	Swapped i and ii under g)
190		312	GE/LE	We suggest being aligned with the new measures for textile adopted by the recent EU documents (EU Circular Economy Action Plan 2020; European Commission Implementation Report on Circular Economy Action Plan 2020; EU Council Conclusions More circularity - Transition to a sustainable society 2019)	We suggest inserting the following text in Section F, paragraph g (ii) incorporating criteria on product durability, reparability, recyclability and recycled content and increasing their resource efficiency	This list covers areas for R&D and innovation. Criteria are important and they are covered in the Guidelines in the table under “traceability information”. No action
191		314	GE/LE	We suggest being aligned with the new measures for textile adopted by the recent EU documents (EU Circular Economy Action Plan 2020; European Commission Implementation Report on Circular Economy Action Plan 2020; EU Council Conclusions More circularity - Transition to a sustainable society 2019)	We suggest inserting the following text in Section F, paragraph g (iii) by reusing, repairing, redesigning and recycling garment and textiles and deleting bullet point (v) “Recycling garments and textiles” because included in the new text added	Added “reusing and redesigning” after “recycling”
192		315	GE/LE	We suggest being aligned with the new measures for textile adopted by the recent EU documents (EU Circular	We suggest adding in Section F, paragraph g the following words	It is covered by the point on sustainability and circularity of production and

				<p>Economy Action Plan 2020; European Commission Implementation Report on Circular Economy Action Plan 2020; EU Council Conclusions More circularity - Transition to a sustainable society 2019).</p> <p>We believe that the text of the policy recommendation should refer not only to sustainable materials but also to circular materials and consider production processes.</p>	<p>“circular”, “and production processes” and so modifying the sentence as follow (iv) “creating more sustainable and circular materials, and production processes”</p>	<p>consumption processes; and later on – in the table on the sustainability information.</p> <p>No action</p>
193		316	GE/LE	<p>We suggest being aligned with the new measures for textile adopted by the recent EU documents (EU Chemical Strategy for Sustainability 2020; EU Circular Economy Action Plan 2020; European Commission Implementation Report on Circular Economy Action Plan 2020; EU Council Conclusions More circularity - Transition to a sustainable society 2019)</p>	<p>We suggest inserting the following text in Section F, paragraph g (v) “tracking and tracing the presence of hazardous chemicals</p>	<p>It is covered by the point on sustainability and circularity of production and consumption processes; and later on – in the table on the sustainability information.</p> <p>No action</p>
194		after line 316 and before line 317	GE/LE	<p>We suggest being aligned with the new measures for textile adopted by the recent EU documents (EU Chemical Strategy for Sustainability 2020; EU Circular Economy Action Plan 2020; European Commission Implementation Report on Circular Economy Action Plan 2020; EU Council Conclusions More circularity - Transition to a sustainable society 2019)</p>	<p>We suggest inserting the following text in Section F, paragraph g (vi) incorporating criteria on product durability, reparability, recyclability and recycled content and increasing their resource efficiency</p>	<p>It is covered by the point on sustainability and circularity of production and consumption processes; and later on – in the table on the sustainability information.</p> <p>No action</p>
195		after line 316 and	GE/LE	<p>We suggest being aligned with the new measures for textile adopted by the recent EU documents (EU Circular Economy Action Plan 2020; EU</p>	<p>(vii) making improvements in waste prevention and reduction, providing extended producer responsibility schemes and encouraging sharing of</p>	<p>It is covered by the point on sustainability and circularity of production and consumption processes; and</p>

		before line 317		Directives on Waste as amended in 2018))	information and best practices in waste recycling”	later on – in the table on the sustainability information. No action
196		after line 316 and before line 317	GE/LE	We suggest being aligned with the new measures for textile adopted by the recent EU documents (EU Circular Economy Action Plan 2020)	We suggest inserting the following text in Section F, paragraph g (viii) Supporting and developing product as service models Boosting the use of secondary raw materials	It is covered by the point on sustainability and circularity of production and consumption processes. No action
197		after line 323 and before line 324	GE/LE	We suggest being aligned with the new measures for textile adopted by the recent EU documents (EU Circular Economy Action Plan 2020; European Commission Implementation Report on Circular Economy Action Plan 2020)	We suggest inserting the following text in Section F, paragraph h (iv) Empower consumers and businesses in taking an active role in contributing to circularity	Added “to take an active role” to the point h.ii.

Date submission:	20 December 2020
Submitted by:	Melissa Rusinek

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
198		70-83	GE, ED	It might be helpful to parse out the distinction between traceability and transparency early on; albeit they’re parsed out later. They are almost used interchangeably here.	Traceability can elucidate supply chain risks and is an enabler for making select information transparent in a value chain. By creating enhanced visibility in value chains, companies are better equipped to manage such impacts, and address financial, operational and	Replaced “more transparent” with “traceability” The other aspects are covered later in the text.

				<p>Additionally, per our meetings, I agree with moving away from the word ‘consumers’. Broadly, citizens is the better term because we’re striving for responsibility, which impacts all citizens (including ecological citizens). But for our purposes, ‘customer’ might be best as it connotes a sense of customer service, at least. Rather than ‘consumers’ consuming for corporate profit.</p>	<p>reputational risks. Also, more-transparent traceable value chains allow companies to respond more effectively to unforeseen disruptions, conform with applicable laws and regulations, ensure product quality and safety, combat counterfeits, and protect cultural and industrial heritage.</p> <p>On the other side, greater Traceability is the enabling mechanism to be transparent with customers. This transparency empowers customers consumers to make better informed consumption choices, as they have more reliable information about the sustainability and circularity claims of products and processes. As a result, traceability and transparency have a strong potential to build trust among all industry actors.</p>	
199		132-141	GE	ISO 14000s. 14001, 1440, etc.	Harmonize with ISO 14001; I’d be happy to provide additional research if helpful.	<p>This is the list of intergovernmental processes and instruments.</p> <p>No action.</p>
200		421-426	GE	Norms and standards could include KPIs, so value chain partners can assess where on the traceability spectrum their supply chains are. Do they have 50% traceability, 60%, 100%, etc.		<p>KPIs are mentioned in the Annex I</p> <p>Added key performance indicators under “Commitment”</p>
201		437-438	GE	+ information (or data), assets	<i>Traceability system</i> refers to all of the practical assets , processes, procedures, information (or data) , and technology needed to create a functional system.	Added “data” before “technology”
202		402-406	GE	Risk-based analysis is mentioned several times throughout this paper; is there a Step-By-Step reference for	Introduce reference guide / established framework for conducting risk-based analysis early on.	Out of the scope of this document. OECD Due

				how Supply Chain actors can analyze their SCs from a risk-based perspective? OECD? Some actors, especially SMEs, may not be equipped/sophisticated enough to know how to conduct a risk-based analysis of their operations or supply chain or partners.		Diligence Guidelines are already mentioned earlier. No action.
203		560-561	GE	Table 2.2 Product-related information: risks are mentioned at the bottom Same comment as above row; seems a bit random since risk-management is the overarching framework for analysis.	Remove “risks” in product-related information; or, add to all other categories in table.	Removed “Risks”
204		NA	GE, TE, ED	Table 2.2 Sustainability related information ¹⁶ Pertaining to environmental sustainability information Water consumption and pollution, CO2 generated, etc, CO2 is commonly measured as GhG equivalents in order to comprehensively quantify Greenhouse Gas Emissions.	-Propose to separate Water consumption & Water pollution into separate metrics; further delineate Freshwater & Marine water ecosystems. Propose change “CO2” to “GhG Eq.” -Energy Use (not just “energy”) + abiotic resource depletion + Light pollution +Eutrophication +Consider adding all Life Cycle (Sustainability) Assessment Environmental Impact Categories / ISO 1440 : https://ecochain.com/knowledge/impact-categories-lca/	Replaced CO2 with GHG emissions Replaced “Energy” with use of non-renewable energies The rest is too much detail
205		927-936	GE	Incentives	Reduction or removal of public subsidies for certain industries that do not have traceability plans. (Similar to EU watershed management	When you get past the upstream agricultural activities public subsidies

					<p>plans for its member countries; but sovereign governments obliging industry to come up with traceability plans, at least).</p> <p>Governments give a lot of public money in the form of subsidies to support industries, to tie these monies to traceability plans, at least, would be progress. This is a way of working <i>within the current system</i>. In addition, and in comparison to, requesting government create <i>new</i> and expensive traceability incentives.</p>	<p>do not have a large role in the textile and leather industries.</p> <p>No action.</p>
206		1378	GE	<p>Wow! To be honest, this was my first time reviewing this full draft. I'm flattered and honored my graphic was used!!! Thank you so much!!! <3 ☺</p> <p>Frans coined this work as the "supply circle" in response to my presentation in Paris. Those comments really inspired me because it's so simple. That's the point – transform supply chains into regenerative supply circles.</p>	<p>Figure A2.1 Circularity in textile and footwear value chains – shifting supply chains to supply circles.</p>	<p>The change would make the title too complex; and the diagram shows a circular supply chain and not the shift from existing supply chains to circular</p> <p>No action.</p>

							Date submission:	18.12.2020
							Submitted by:	International Fur Federation / IFTF
Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)		

207		141	GE	<p>As the policy recommendation includes animal welfare in its scope, a reference could be added to the OECD-FAO Guidance for Responsible Agricultural Supply Chains, which creates a voluntary international framework for the risk mitigation of animal welfare at farm level based on the work of the OIE.</p>	<p>[...]the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; and the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, and the OECD-FAO Guidance for Responsible Agricultural Supply Chains.</p>	Added
208		314	GE	<p>While recycling is spelled out in the list, repair and reuse are not. By mentioning these two elements, the policy recommendation will be better cover R&D work in the field of product design by covering two essential aspects that can increase the lifespan of a product. This will also create a stronger alignment with the ‘waste hierarchy’ adopted at EU level and favoring prevention of waste over recycling of waste, as illustrated below.</p> 	<p>(iii) Increasing the lifespan of products, including through repair and reuse.</p>	<p>Increasing the lifespan of products corresponds to the preparing for re-use in the EU hierarchy.</p> <p>No action.</p>
209		301-304	GE	<p>On the issue of incentives (see below) Textile Exchange are working on an Impact Incentives programme, which I am not sure if you are familiar with? It was discussed at their conference in November and we received a presentation on it this</p>		<p>Noted.</p> <p>No action.</p>

				<p>week. I would be happy to facilitate an introduction with Anne Gillespie of Textile Exchange as they have produced some very interesting material.</p> <p>https://www.impactincentives.org/</p>		
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Date submission:	20.12.2020
Submitted by:	Swedish environmental protection agency

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
210		1	ge	The scope is just for garment and footwear industry?! Why this delimitation? Why not include all types of household textiles like bedlinen, towels, tablecloths etc	Would be useful with a description of the scope and the delimitations done.	<p>The scope was developed to align with the OECD Due Diligence Guidelines on garment and footwear. The principles and elements of recommended traceability system and approach are applicable also to home textile.</p> <p>No action.</p>
211		245	le	In addition, challenges connected to GDPR could be of importance in terms of re-used products. In a second-hand setting data from the previous owner is desirable but could pose a legal challenge in the possibility of storing private data.	In addition, challenges connected to GDPR could be of importance in terms of re-used products.	The first sentence of the paragraph was changed to include reference to data privacy and security principles and regulations, thus covering GDPR.

212		360 1426	te	The text states that traceability allows identifying where assets are. Generally, this is the definition of Tracking, whereas traceability is about following a trail left behind. This could be an important distinction even though Track and Trace are often mentioned together. Tracking generally implies real-time data, whereas traceability does not necessarily imply this. Track and Trace is listed in the glossary, however without any definition.	Remove sentence beginning with “It allows...” and reformulate subsequent sentence.	Redrafted to reflect the suggestion.
213		516	te	The value chain is inconsistently labelled “textile and leather” instead of “garment and footwear”. Indeed, it could be argued that textile and leather is not in itself a value chain as there is no end customer in that context.	Either “textile- and leather-based value chains” or “textile and leather supply chains.”	Changed where appropriate.
214		524	Te	Similar to above.	Adjust to: “the main value chain stages for textile- and leather-based products”	Textile and leather products include and garment and footwear. No action.
215		1376	te	Similar to above.	Adjust to: “Circularity in textile- and leather-based value chains”	Done.
216			ge	Other value chains with textile- and leather-based products, e.g., automotive, health care, home furnishings, are not considered or		The scope was developed to align with the OECD Due Diligence Guidelines on garment and footwear.

				addressed in these guidelines. It would seem that in the least case, a recognition of other value chains would be warranted, regarding for instance potential opportunities or conflicts.		The principles and elements of recommended traceability system and approach are applicable also to home textile. No action.
217		526	ed	Raw material is described here as “cultivation and harvest / livestock raising and slaughter” which would seem to limit raw materials to being cotton, bast fibres and leather. In general, the use of examples throughout the guidelines are limited to cotton and leather. Very few if any examples of other materials are found: synthetics, man-made cellulosic (with ancient and endangered forests of key importance regarding traceability), and importantly, feedstocks from recycled sources.	The guidelines would benefit by encompassing a broader set of examples for raw materials and raw material stages, including oil fields and refineries, forests, pulp processing, bast fibres, retting, shearing, and material recovery streams.	Changed to Raw material production with no further specification
218		554	ge	The information about a product (the ID) is mutually important for the second and third life of a garment. Re-use should be promoted, and traceability information could also contain information about previous owner. Therefore, the possibility of adding data to the ID is of high importance.		Noted.

219	561	ed	Table 2.2, Traceability Information, column regarding Social: Included in Employment and Employment conditions, critical issues regarding recruitment policy, labour agents, recruitment fees should be included.	Employment & Employment conditions → - - - - Recruitment policy, use of labour agents, recruitment fees	Added “Recruitment practices”
220	818	ge	Using fur as an example suggests that fur-based products are included in the intended scope of the guidelines. Of course, fur-based products are within the context of garment and footwear, but nowhere else in the document is there any indication mention of fur-based products, and the otherwise use of “textile and leather” would exclude fur.	Clarify if the Garment & Footwear scope of the guidelines is intended for engagement of the fur industry.	The guidelines are relevant for the fur industry even if they are not part of their official scope. No action.
221	1005	te	Just a remark that there are possibilities and challenges with all these new but important technologies for traceability and transparency. It is therefore important to highlight and investigate aspects like energy use for these new technologies.	Consider highlighting also the challenge with extreme use of energy needed for blockchain technology. New report from EEA: Blockchain and the environment https://www.eea.europa.eu/themes/sustainability-transitions/drivers-of-change/blockchain-and-the-environment An energy-intensive technology undermining climate change mitigation or a game changer for the governance of sustainability transitions?	Addressed in the revised text under E. Challenges
222	1502	le	To enforce independent and trustworthy audits will be necessary to ensure that traceability and transparency can	The need for auditors and audits within the system maybe needs to be clarified even more?	This is covered under section C. Key traceability system concepts, Verification processes: the

				be achieved in all stages of the value chain. This will be one of the main challenges for the system. To achieve trust in the long run.		role of audit and certification, a) Audit. No action.
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Date submission:	18.12.2020
Submitted by:	Secretariat

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
223		487	ed		Remove “good” on the second example of the sustainability claim. Replace the objective of the sustainability claim “sustainable sourcing” by one of the 8 ILO fundamental conventions , for instance “minimum age” (Convention 5) to make the example more concrete.	This example was deleted as part of other changes.
224		487	te		Considering the scope of the traceability approach to cover sustainability performance regarding claims on 1. Products 2. Processes and 3. Facilities/Organizations, consider adding one sample for each.	These three are now covered in the revised text.
225		526	te	Figure 2.1 is very generic and could be further detailed. Figure 2.1 can be kept as a simple overview of the value chain processes in garment and footwear. An additional figure could be detailed as per	Complement figure 2.1 with additional business processes as per the business process analysis carried out for textile and leather, possibly clustering the business processes twofold: upstream and downstream.	This is a valid suggestion, but its implementation would require significant additional work. Can be considered for a version 2.

				the textile and the leather business process analysis.		
226		1098	te		By complementing with small research, illustrate the examples of gender-related claims referring to existing verification criteria / international standards (e.g. equal remuneration Convention and /or Discrimination Convention of the ILO Fundamental Conventions) to make the examples more concrete	The table with the examples has been removed.
227		1099	ed		Remove the uppercase letter of the “C” of claims in the title of figure “Samples of gender-related claims”	The table with the examples has been removed.
228		1376	ge		In the glossary for the definition of circularity, consider replacing the current infographic of the Figure A2.1 Circularity in textile and footwear value chains by the infographic from the following reference UN Environment Programme (2020). Sustainability and Circularity in the Textile Value Chain - Global Stocktaking, Nairobi, Kenya - Figure 3: Representation of activities taking place in a circular textile value chain, p.14.	Done

Date submission:	18.12.2020
Submitted by:	Natalie Grillon, Open Apparel Registry

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
229		247	TE	Accuracy of data is also paramount concern, ie names and addresses of facilities being incorrect, incomplete, not able to be geocoded	“the accuracy, reliability and authenticity of data”	Added “accuracy”
230		258	GE	Blockchain computing power is also environmentally costly - it requires enormous amounts of energy	As well as costs, including environmental footprint, and available infrastructure	Added “and environmental impact” at the end of the sentence in question.
231		292-293	GE	For complete transparent access, this data should be published under open data standards	In line with international data protection norms and open data standards	Revised the sentence as follows: “This should be done in a timely, culturally sensitive, open and accessible manner, in line with international data protection norms and standards.”
232		561	GE	It’s not clear in the table under facility information whether the bullets pertain to location information or not, For clarity suggest adding Address and GPS coordinates to Facility Related information. Also suggest to add “type of facility” or “Type of production”	“ GPS Coordinates” “Address” “type of facility” or “Type of production”	Added “Address” and “Physical coordinates” under “Location”; Added “Type of facility” as a separate category
233		561	GE	Suggest to add Transparency Pledge Data Requirements to Social Sustainability Related Information		The table is the list of data to be collected, while the Transparency pledge covers what you do with the data. The latter is covered by the Recommendation (c)
234		589-590	GE	Suggest to reference availability of free and open IDs so as not to create additional barriers for interoperability	“there are many options for ID standards, some of which are free and available under open license. A number of which are shown”	The text replaced as follows: “There are many options for ID standards, some of which are free and available under

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
						open license. Examples of some ID standards are shown in table 2.3.”
235		614	GE	Suggest adding OAR ID as an example for Location ID - OAR open source database has over 51k apparel and footwear facilities with open OAR IDs, wide spread industry adoption for UUID for interoperability and use of the tool and the ID is completely open and free for all to access, obtain and use including the facilities themselves. Unlike a GLN, facilities do not have to pay.	OAR ID (Open Apparel Registry ID) - Location	Added a line to the table 2.3: “Open Apparel Registry ID (OAR ID) Facility”
236		951	TE	While open source is important, an open license on the data is also of tantamount importance. This facilitates data sharing, for free and open use, not just the software itself. Without an open license, data ownership and use is an open question. Please note the distinctions between “open source” and “open Data” https://digitalprinciples.org/principle/use-open-standards-opendata-open-source-and-openinnovation/ https://timreview.ca/article/757#:~:text=In%20an%20open%20source%20project,participate%20in%20the%20software%20development.&text=The%20output%20is%20also%20different,aims%20to%20change%20the%20software	The development and nurturing of open sourced and open licensed tools and data	Revised as follows: “The development and nurturing of open-source (see box 2.2) and open-licence tools and data”

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
237		1001	TE	Same as point above	“..in new technologies, open innovation, open data and open source software”	Revised as follows: “For instance, access is facilitated by support for training in new technologies, open innovation, open data, open-source software (see box 2.2) and the development of information infrastructure such as affordable Internet access and an active ICT services sector.”
238		1012	TE	Suggest “open” rather than transparent as "open" has specific		Added “open and” before “transparent”
239		1161	TE	Suggest to add open data as well as open source per comments above	“Research and open-source and open data technology solutions”	Added “open data” before “open source”

Date submission:	20.12.2020
Submitted by:	Lena Coulibaly and Francesca Poggiali, GS1

Ref. (leave blank)	Draft version number	Line numbers	Type of comment	Comments	Proposed changes	Working Group Observations (leave blank)
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240		NA	GE	<p>GS1 as a global, neutral, non-profit standards organisation welcomes the Policy Recommendation with the Implementation Guidelines “Enhancing Transparency and Traceability for Sustainable Value Chains in Garment and Footwear”. We take this opportunity to show our support and engagement towards UNECE and the stakeholders community involved in the discussions. We provide here following some general comments and we remain available for further discussions.</p> <p>We would like to provide supporting evidence regarding the importance of global unique product identification (as mentioned in Section 4, table 2.3 Examples of IDs).</p> <p>GS1 open standards for product identification and data sharing are already implemented by industry and many different economic operators, in 25 different sectors. The GS1 Global Trade Item Number (GTIN) is used by over two million companies and organisations around the world to uniquely identify trade items. In GS1 we strongly believe that supply chain transparency starts with unique identification. Another important element in today’s digital world is to enable the digital twin transition to allow data exchange along several</p>		<p>Added a footnote referring to EPCIS: ISO/IEC 1987:2017 Information technology — EPC Information Services (EPCIS) Standard under the subsection 6.Events.</p> <p>GTIN is already referenced in the table Table 2.3 Examples of IDs.</p>
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				<p>different partners in an interoperable, open and structured way. The link between the physical product and the digital one is made by the standards, by a common language now including also B2C.</p> <p>At this regard EPCIS (Electronic Product Code Information Services) enable automated processing and sharing of information between and across trading partners. EPCIS is a critical component for traceability systems. EPCIS enables trading partners to share information about the physical movement and status of products across supply chains. https://www.gs1.org/standards/epcis</p> <p>The GS1 Digital Link standard extends the power and flexibility of GS1 identifiers by making them part of the web. That means that GS1 identifiers, such as GTIN, are now a gateway to consumer information for improved supply chain traceability information and more. https://www.gs1.org/standards/gsl-digital-link</p> <p>One fundamental aspect regarding sustainable products relates to the need, expressed by industry in different sectors, to be able to share data based on a common semantic. That's why GS1 and W3C joined forces around a common vision which</p>		
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				<p>has been clarified into a document available here https://www.gs1.eu/news/a-standards-based-knowledge-system-for-the-circular-economy</p> <p>In summary, GS1 welcomes the work undertaken by UNECE and we remain available to support the community engaged in this effort through:</p> <ul style="list-style-type: none"> • unambiguous identification of products, places, assets and shipments through GS1 open standards • a globally recognised and effective standards management process • scalable approaches to data sharing for the transactions and events necessary to achieve traceability use cases • tailored training and partnering with NGOs and intergovernmental organisations to progress traceability capabilities <p>More information regarding the GS1 system is available here https://www.gs1.org/standards</p> <p>In case you need more information on how GS1 is supporting this effort please contact: Lena Coulibaly (Director Community Engagement, Apparel & General Merchandise, lena.coulibaly@gs1.org), GS1</p>		
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				Francesca Poggiali (Public Policy Director Europe, francesca.poggiali@gs1.org), GS1		
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