

# BUSINESS REQUIREMENT SPECIFICATION TEXTILE AND LEATHER HIGH LEVEL PROCESS & DATA MODEL (BRS TEXTILE & LEATHER HIGH LEVEL V1.0) Template for comments and observations

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Date submission:	30 December 2020
Submitted by:	V. Cram-Martos

Please make all comments using this template.

Please propose suggested changes in order to make the Draft align with your comments (only those with proposed changes can be fully considered).

Ref. (leave blank )	Draft version number	Line numbers	Type of comment <sub>1</sub>	Comments	Proposed changes	Working Group Observations (leave blank)
		110-111	ed		Change “in improving” to “to improve”	Done
		118	ed		Change “focusses specific attention to tackling” to “focusses specific attention <b>on</b> tackling”	Done
		130	te and ed	The proposed title for the new RDM uses here the term “Sustainability Development” which sounds odd in English. Looking further, in the diagrams it is “Sustainable Development” (as in the Sustainable Development Goals) which makes more sense.	Change “Sustainability” to Sustainable”	Done

		144-146			Change, “With harmonization often comes simplicity which results in the avoidance of the creation of different information entities having the same semantic meaning.” To “With harmonization often comes greater simplicity which makes it possible to avoid the creation of new/different information entities having the same semantic meaning”	Done
		150	te	You must have traceability in order to support claims – so it cannot be an “eventual” afterthought – so “eventually” should be deleted. In addition, the information for traceability and transparency is not always the result of a “business transaction” it may just be	Delete “, eventually,” Preferably delete “business transactions” and replace with “actions” or “activities” or “events”. If that is not possible, at a minimum, delete “business”	Deleted “eventually,” replaced “business transactions” with “business data exchange structures (messages)”

				an event/action/activity in a process that creates this information.		
		155	ed	“Nonetheless” is synonymous with “In spite of what was just said” and this sentence is just an addition, it is not an “in spite of” action.	Replace “Nonetheless” with “In addition”	Done
		198	ed		Replace “base” with “basis”	Done
		201		If the titles of either of these documents is changed the graphic here will need to be changed		Done
		235		Which separate document are we referring to here? The BPA report?		Sentence reads as follows: “More detailed information for each generic process is available on the UNECE website.”  A footnoted added.
		248	ed	“Slaughter” is a verb, not a noun	Change “Slaughter” to “Slaughterer” (or “Slaughterhouse”)	Done
		248	te	In the graphic: Change “Service Suppliers” to “Other Suppliers” because transport and warehousing are also services. Then move “Suppliers” from under “Product Guardians” to under “Other Suppliers”. While it is true that suppliers handle products that they do not change (chemicals, fertilizers, animal feed, packaging, etc.) they do not have possession of the products being traced or verified like a	In the graphic: Change “Service Providers” to “Other Suppliers” because transport and warehousing are also services. Then move “Suppliers” from under “Product Guardians” to under “Other Suppliers”.	Done

				product guardian does and what they supply is used, primarily, in transformation or packaging processes		
		251	TE		Remove “Trader” from “Agent / Trader”. Replace definition as follows: A person or company who has been legally empowered to act on behalf of another person or an entity	Done
		251	ED		In the line “Effluent Treatment Party”, “Laboratory Party” and “Waste Disposal Provider” revise the beginning of the description as follows: “A person, company or body...”	Done
		251	ED		In the line “Subcontractor” revise the beginning of the description as follows: “A person or company that signs...”	Done
		251	Te and ed	Change the definition of “finishing provider” because finishing includes many more processes than those listed (See <a href="https://www.britannica.com/topic/textile/Textile-finishing-processes">https://www.britannica.com/topic/textile/Textile-finishing-processes</a> or <a href="https://www.textileschool.com/211/definition-and-classification-of-fabric-finishing/">https://www.textileschool.com/211/definition-and-classification-of-fabric-finishing/</a> )  Also, we are using the term “fabric” or “textile” instead of “cloth” because in English	Replace the current definition with: “A person or company whose trade is the dyeing, bleaching, washing or other treatment of fabrics to improve their appearance or performance.”	Replaced

				the plural of “cloth” i.e. “clothes” is generally used to refer to items of clothing and almost never to refer to multiple fabrics – and so use of the term “cloth” when it eventually needs to be used in plural can be confusing.		
		251	ed	Change the definition of Customer. “It currently says “A person or company who buys goods or services from another company.” IF it is a person, then it cannot be “another” company, so “another” should be deleted.	Delete the word “another” from the definition of Customer.	replaced by “a”
		251	TE		Add a line “Trader” with the following definition: “A person or company who buys and sells goods.”	Done
		251	ed	Slaughter” is a verb and “Slaughterer” is a noun	Change “Slaughter” to “Slaughterer” for entry 15	Done
		251	TE		Add a line “Wholesaler” with the following definition: “A person or company that sells goods in large quantities at low prices, typically to retailers.”	Done
		260	ed		Revise the description of “A.16 Consumption information” as follows: Keeping record of inputs/outputs in order to compare predefined and actual consumption of materials and resources (including energy	Done

					consumption and water use), product or product batches.	
		260	ed		In the definition of A.20 Production process information, revise the second sentence as follows: “Inputs/outputs of these machines/devices and related resources (including production materials, energy and water), products, product batches, production cycle and operational and requested parameters are exchangeable.”	Done
		265-267	ed		Replace text in these lines beginning with “For effective” with the following: “For effective traceability, it is necessary to record data about the five W’s - What, When, Where, When, Why (includes How) for value chain events. Traceability is established by value-chain partners storing this information, and retrieving it, from a common place, such as an EPCIS database, a blockchain or a cloud application. Once assets are traceable it is possible to retrieve additional, relevant information; for example, about sustainability.”	Replaced
		271	te	Do not understand why “Consumer” is in this diagram, nor why it is in yellow		Deleted “Consumer” box
		305	ed		Change “API” to “APIs”	Added

		310	ed		Replace “including energy and resource use,” with “including energy consumption, resource use,”	Done
		311-313	te, ed	“Sustainability” in any case ever since the SDGs, has not “traditionally” been limited to resource usage -and even before the SDG, pollution levels were important. Also, issues like human and labour rights are completely forgotten here	Replace text with “In the past, measuring sustainability has sometimes focused on environmental and resource-related factors such as materials and energy consumption, water use and pollution levels. Other factors can also affect sustainability performance including respect for human and labour rights as well as operational data (e.g. employee headcount and salaries, hours of operation, production levels and facility productivity).	Replaced
		319	ed	In this illustration there are a few mistakes as noted to the right	<ol style="list-style-type: none"> <li>1) Replace “Retunable Asset Instructions” with “Returnable Asset Instructions”</li> <li>2) Replace “Finshing treatments” with “Finishing treatments”</li> <li>3) Replace 1 of the 2 instances of “social aspects” in the lower right corner – maybe with “Employment conditions”</li> </ol>	Typos are corrected; 2nd instance of “Social aspects” replaced with “Labour conditions”
		325 and 326	te	These 2 tables should be identical to the tables in the Guidelines which were revised as a result of the public review	Replace with the revised tables from the Guidelines	Done
			ed		Change “-batch” to “product batch”	Replaced in the text throughout

		356-357	ed		Insert a blank line between these two lines	Done
		357	te	Is this correct “In the information entities below the sustainability related information entities have been listed”? From a logical standpoint one can have “boxes inside of boxes”(information entities inside of information entities”) but it might be clearer if the two types of information entities had different names.	Consider changing text to match the diagram title and to read, “Below, the key traceability entities are listed with their associated sustainability information.”	Replaced
		361-363	te	I have no idea what “common with a vertical approach” means in this sentence.	Redraft to read, “To avoid numerous information entities which are “similar but different,” the following three generic information entities are used extensively throughout the Textile and Leather Data Model. This allows codes to be used to distinguish between, for example, different characteristics”	Replaced
		364	te	The first entity under Tolerances is “information” this is very vague and not codable, so I was wondering if this is a mistake and it should not say something like “Type Tolerance”		“Information” is a valid data type. No action taken.
		377	ed		Replace “regarding” with “for”	Done
		384	ed		Replace “Traceability is tracing” with “Traceability is the ability to trace”	Done
		393	ed		Replace “on class level (type) or instance level” WITH “at a class level (i.e. by type) or an instance level”	Done

		395-6	ed		Replace “In other words, of which materials, products are inputs to the product batches which are produced” With “In other words, to identify which materials or products are the inputs to the product-batch outputs from a process.”	Replaced
		402	ed		Replace “the link between the traceable asset and the logistics unit is important” with “the link between traceable assets and the logistics unit(s) which contains them is important”	Replaced
		403-404	ed		Replace “such as placing products on or from logistics units to other units.” with “such as placing products into, or taking them out of logistics units as well as combining and separating logistics units themselves (for example putting a pallet logistics unit inside of a container logistics unit).”	Replaced
		412	te		In the footnote: replace “EPCIS” with “Event-”	Done
		413	ed		Change “API (Application Programming Interface)” to “APIs (Application Programming Interfaces)”	Done
		424	ed		Change “translate” to “transform”	Done
		427-430	Te/ed		Replace as follows: “The ISO/IEC standard enables automatic data collection via barcode	Done

					formats and different kinds of labels and electronic product codes such as RFID and QR labels and allows users to share information via traceability systems.”	
		431	ed	No need to put a new acronym in the title	Change “UIDs” in the title of this graphic to “Unique IDs”	Done
		434	te	What needs unique IDs depends upon the product, the level of traceability and what is being traced so you would not give unique IDs to everything listed.	Change “should be” to “can be”	Done
		448	ed		Change “could” to “can”	Done
		449	ed		Change “the use of particular code lists for which data elements will be described” To “the use of specific code lists for individual data elements will be described”	Done
		454	ed and te	It is more than “can be” – Assets <u>need to be</u> tagged, traced and information made available electronically.	Replace “can be tagged, traced and the information can be made available in electronic format.” WITH “need to be tagged, traced and the information made available in electronic format.”	Done
		454-456	Ed and te	One could meet all of the previous requirements (tagging, tracing and electronic information) and still end up implementing mass balance instead of product segregation. So this statement is not true.	Replace “These systems will use <i>Product Segregation</i> which is the preferred model for a traceability system. Product Segregation can be implemented both for bulk	Done

					commodities and for identity preservation.” WITH “ <i>Product Segregation</i> is the preferred model for traceability systems and can be implemented both for bulk commodities and for identity preservation.”	
		462-464	te and ed	The description of identify preservation forgets to mention the single most important aspect of this model which is no mixing of products from different producers. This is corrected in the proposed replacement text	Replace “Identity preservation requires segregation of the certified material from the non-certified materials throughout the supply chain to provide traceability from a specific source (for example a farm) to the final consumers.” WITH “Identity preservation requires segregation of the certified material from the non-certified materials throughout the supply chain with no mixing of materials from different producers. This is needed in order to provide traceability all the way back from the final consumer to a specific source (for example a farm)”	Done
		467-468	te and ed	In the current text it says that the problem is “assets with different sustainability characteristics” being merged “other assets” where “other assets” are not defined.  I am almost sure that what was meant is that the problem is assets with “different sustainability characteristics” being processed	Replace “If not, then assets with different sustainability characteristics are processed and merged with other assets.” WITH “If not, then assets with different sustainability characteristics risk being accidentally (or even deliberately) processed and merged together, thus defeating the objective of product	Done

				and merged together. So there is a proposed new wording to the right with a little additional explanation.	separation and making sustainability claims untrustworthy.”	
		470	ed		Replace “cotton, green electricity other methods” WITH “cotton and green electricity, other methods”	Done
		481-482	ed		Replace “it requires a well-defined administration and process design in order to implement a Mass Balance model.” WITH “implementing a Mass Balance model requires a well-defined administration and process design.”	Done
		495	te	Book and Claim, and this illustration, seem to be confusing to people based on feedback from the Guidelines so we inserted additional explanation after the illustration into the Guidelines and it may be useful to do the same here.	Insert the following paragraphs at this point: “Under the book and claim model there is no physical relationship between the amount of sustainable inputs included in a product and the amount of sustainable content that is claimed. Instead, the producer of the goods purchases sustainability certificates to cover the difference between the amount of actual sustainable input in the product and the amount that the producer wants to claim. These certificates are then used to reward farmers who produce an equivalent amount of	Added

					<p>sustainable inputs (which will be used to produce other products).</p> <p>This is shown in the illustration above where a production plant receives inputs, of which 25% (100 kilos) have been sustainably created. Because the producer wants to claim that 50% of their product is sustainable, they purchase (book) certificates for another 25% (i.e. another 100 kilos). The money paid for the certificates is then paid to a farmer who proves that he has created 100 kilos of sustainable inputs (for use in other products). This creates a financial incentive for producers to make sustainable inputs and sell them at prices that are competitive vis-a-vis non-sustainable inputs.”</p>	
		497-501	te and ed	<p>In my view, the drafting misses a key point on why having the traceability information makes the sustainability information “retrievable”. Have tried to explain this in the proposed text.</p>	<p>Replace, “Each business partner in the value chain should record and provide the key data elements answering the 5 W’s (What, When, Where, Why, When). Once traceable assets can be traced, the relevant sustainability information behind these traceable assets are retrievable, when business</p>	Replaced

					<p>partners make their sustainability data available when requested.”</p> <p>WITH</p> <p>“Each business partner in the value chain needs to record and store in a common data source the key data answering the 5 W’s (What, When, Where, Why, When). This establishes traceability. At the same time that they collect and register data on the 5Ws, business partners need to store, in their own database, associated sustainability information (for example, product test results or facility inspection reports)..</p> <p>Then, when sustainability information is needed, the traceability information allows the information requestor to identify who has the needed sustainability information and then they request it directly from the relevant business partner – who, in this context, has control over the access to this more detailed information.”</p>	
		505	ed		Delete the word “made” from this line.	Done
		507	te and ed	The current sentence does not explain what the list below it is, nor why/how one should differentiate.	Replace “Differentiate between document equivalent and business process driven snippets” WITH “These exchanges will need to accommodate	Added with a “:” at the end

					both document equivalent and business process driven data snippets and should differentiate between them. Examples of some of the technical solutions for both types of exchanges are listed below.”	
		508	te and ed	One should not forget to mention XML	Insert below this line “eXtensible Markup Language (XML)”	Added “such as UN/EDIFACT and UN/XML” after Traditional Electronic Data Exchange (EDI)
		509	te	There is a small explanatory text for all of the technologies listed except for this one (Process-driven data exchange snippets). Therefore, this one should either be deleted or some explanatory text written (as well as the text for XML).		Added a subsection 5.15.1.2 Process-driven data exchange structures (CCBDA data structures, documents and snippets of documents) The exchange of information is moving away from a document-based approach towards a process-driven approach where only the information needed for a process to continue is exchanged. This is because, very often, the applications of trading partners need to process only a part of the

						<p>information found in a standard message. A message is a container for information exchanged between trading partners and is structured according to a standard (rules) for a business data exchange structure. It is this structure that allows an automated identification of a message's information contents. The UN/CEFACT CCBDA (Core Component Business Document Assembly) methodology specification supports both approaches. It can be employed wherever business information is being shared or exchanged among and between enterprises, governmental agencies and/or other organizations. The specification is developed to identify</p>
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						how to construct a message for use within a particular business process. A message can be a complete document, such as an invoice, or a mini document (a snippet) as a result of a query.	
		525-527	ed			<p>Replace “Today new requirements regarding the exchange of data have emerged. The reason for this is often the need for instant, trustful, shareable and light weight information. Assumably, a hybrid form of document-oriented information exchange and fragmented, on demand information will exist.” WITH “Today, new requirements have emerged for data exchanges. The reasons are often the need for instant, trustworthy, shareable and/or light-weight information. As a result, it is fair to assume that, in the future, hybrid forms of document-oriented information exchange and fragmented, on demand, information will exist.”</p>	Replaced
		531-537	ed & te	Drafted to clarify a few points – I used change marking in the revised version to the right so you can more easily identify where changes were made		<p>Replace “Forwarding or retrieving information from a step forward or backward (traditional way) is an option, but is not very efficient for getting an</p>	Replaced

					<p>overview across organization and across supply chain stages. The EPCIS standard, incorporated in the Textile and Leather Process &amp; Data Model, consist of a few information entities to be exchanged to a shared EPCIS-based repository for instant sharing and overview across organizations within the supply-chain. Additional information, such as contributing to more transparency may be exchanged using traditional EDI or using another technology such as API.”</p> <p>WITH</p> <p>“Forwarding or retrieving information from one step forward or backward in the supply chain (the traditional way) is an option, but it does not always work when the information is more than “one step away” and is not very efficient for getting an overview across organizations and across supply-chain stages. The EPCIS standard, incorporated in the Textile and Leather Process &amp; Data Model, consists of a few event information entities that are stored for exchange in a shared Traceability Repository by all business partners for instant sharing. This provides an overview across organizations within the supply-chain. Additional information, such as</p>	
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					that contributing to more transparency may be exchanged using traditional EDI or using another technology such as APIs.”	
		539			Replace “EPCIS” with “A repository”	Done
		540-541	Te and ed	One needs to identify relevant processes before identifying the relevant events, not after. I also have my doubts that events are different from activities so I put “events (activities)” but you could also put “activities/events” or, if they are different, “relevant processes and activities and within them relevant events”.	Replace “Important for a traceability solution is identifying the relevant events, capturing and recording event data, identifying the relevant processes and activities.” WITH “Important for an EPCIS traceability solution is identifying the relevant processes and within them relevant events (activities), and then arranging to capture and record event data.”	Done
		546	te	EDI and EPCIS are also different from one another and none of these (EDI, EPCIS or Blockchain) are a business application (the next sentence which says “Blockchain is not a business application.” implies that this is what differentiates it from EDI and EPCIS...). They ALL are just technologies that support applications so that is not what differentiates them.	Delete “It is different to traditional electronic data exchange (EDI) or EPCIS.” Note – if you decide to keep this text, it should be “different from” (not “to”)	Deleted
		551-552	te	The cryptographic hash is most commonly used for the verification of data, not its retrieval. Also, there are different ways for doing this and in private/permissioned blockchains where you do not have to pay (or you pay less) for	Replace “Retrieving data is done through a cryptographic hash of the data and a pointer to off-chain data” With “Retrieving and verifying data is most often done using pointers to off-	Done

				storing data on a blockchain, more data may be actually written to the blockchain than on a public blockchain where the more data you store or retrieve, the more you pay.	chain data and cryptographic hashes of the data.	
		589	ed		Change “manufacture” to “manufacturing” and delete the “the” at the end of the line	Done
		596	ed		Change “special” to “specialty”	Done
		618-624	ed		Merge the two bullet points as follows, and add the text as continuation of the previous paragraph. “In addition, there are some actors who can, but do not always, participate in all of the processes, such as the logistics service provider (transporter). To simplify the diagrams, those actors that could participate in all processes have been placed in a separate box in the upper right-hand corner.”	Done
		650	ed		Replace “A value chain where products, such as exotic skins” with “Value chains for products such as exotic skins”	Done
		658	te	The use case diagrams do not show the “flow of interactions” that is done in the activity	Replace “flow of interactions” with “processes”	Done

				diagrams, at best they show the “flow of processes” and even that would be better shortened to just “processes” as the flows may vary depending upon the value chain		
		825	te		Replace “7.3 Electronic Product Code Information Services (EPCIS)” with “Traceability Event”	Done
		828	te		Remove “& Transparency”	Done
		857	ed	In the definition for JSON	Replace “JavaScript Object Notation)” with “JavaScript Object Notation (JSON)”	Done
		857	te	<ol style="list-style-type: none"> <li>1) What we want to define here is a Use Case Diagram because a “Use Case” is just one of the ovals in a “Use Case Diagram”</li> <li>2) The definition given, which is for a Use Case Diagram, is in my view, less correct than the one I am suggesting. In particular, <ul style="list-style-type: none"> <li>• it says that a Use Case (which should be a “use case diagram) “is a list of actions or event steps” and in the use case diagrams we prepared (and I believe this is the general case) the use cases in the use case diagram are discrete processes not actions or event steps which are defined in the activity diagrams.</li> <li>• The current definition also says that use cases are “typically defining the interactions between a role (known in the Unified Modeling Language (UML) as an actor) and a system” and this is not the</li> </ul> </li> </ol>	<p>In the left column replace “Use Case” with “Use Case Diagram”</p> <p>Replace the existing definition in the right hand column with:  “A use case diagram ... depicts two types of elements: one representing the business roles [actors] and the other representing the business processes [use cases]... An actor in a use case diagram interacts with a use case... [and]... makes an impact on the functionality that you want to model..... A use case in a use case diagram is a visual representation of a distinct business functionality in a system.”</p> <p>For Footnote: adapted from “Elements of a Use Case Diagram”, Penn State College of Earth and Mineral Sciences,</p>	Done

				<p>case: use case diagrams only identify which actors interact/impact on which processes – they do not define the interactions – that is done in the activity diagrams and business process descriptions.</p>	<p><a href="https://www.e-education.psu.edu/geog468/l8_p4.html">https://www.e-education.psu.edu/geog468/l8_p4.html</a> (accessed 30-12-2020)</p> <p>ADD to this at the end  “Use Case Diagrams” were originally defined as part of <b>UML</b>, short for Unified Modelling Language, which is a standardized modelling language.  WITH the following footnote: For more information on UML see <a href="https://www.omg.org/spec/UML/About-UML/">https://www.omg.org/spec/UML/About-UML/</a> (accessed on 30-12-2020)</p>	
		NA	GE/ED	<p>The acronym “TT” is used many times in this document but the only place it is defined is in the last entry of the table at line 228 where it is “Traceability and Transparency” under “System Capabilities”</p>	<p>Do not use TT in the document, and spell it out where necessary</p>	Done
		4, 5 and 6	ed & tr	<p>The title of this document and the other BRS with the CCBDA information are too similar and easily confused. Please look to find title that more clearly distinguish between the two documents.</p> <p>Title of this document  “BUSINESS REQUIREMENT SPECIFICATION  TEXTILE AND LEATHER HIGH LEVEL PROCESS &amp; DATA MODEL  (BRS TEXTILE &amp; LEATHER HIGH LEVEL V1.0)”</p> <p>And the title of the second document is:</p>		<p>Replaced as follows:  Business requirement specification for traceability and transparency in textile and leather, Part 1:  High-level process and data model</p>

				“BUSINESS REQUIREMENT SPECIFICATION TEXTILE AND LEATHER TRACEABILITY AND TRANSPARENCY PROCESS & CCBDA DATA MODEL (BRS TEXTILE AND LEATHER PROCESS AND CCBDA DATA MODEL V1.0)		
		523	ed		Delete the word “any” from this line	Done

Date submission:	3 January 2021
Submitted by:	Gerhard Heemskerk

Please make all comments using this template.

Please propose suggested changes in order to make the Draft align with your comments (only those with proposed changes can be fully considered).

Ref. (leave blank )	Draft version number	Line numbers	Type of comment <sub>1</sub>	Comments	Proposed changes	Working Group Observations (leave blank)
			ED		Replace “brands” with “brand owners” where applicable	Done
		199	ED		Add “data” after CCBDA	Done
		228	TE		Replace the description in the lines “Business Process Role” and “Supporting Role”, respectively with: “Information Partners, Transformation Partner, Product Guardian, Validation/Verification Bodies, Other Suppliers /Service Providers” and “Farmer, Breeder, Finishing Provider, Slaughterhouse, Tanner, Recycler, Agent /Trader, Customer, Consumer, Supplier, Subcontractor, Inspector, Certifier, Laboratory Party, Manufacturer, Warehouser, Transporter, Brand Owner/Retailer,	Done

					<p>Exporter, Importer, Carrier, Freight Forwarder, Customs Import Agent, Customs Transit Agent, Customs Export Agent, Raw Fibre Treatment Provider, Spinner, Weaver, Finishing Provider, Waste Disposal Provider, ID Provider, Effluent Treatment Party, Traceability System Requestor, Traceability/Transparency Information Requestor, Repository Party.”</p> <p>Add “and repositories” after “databases” in the line “System Capabilities”</p>	
		251	TE		Remove “Chemical supplier”	Done
		509	ED/TE		Replace “Process-driven data exchange snippets” with “Process-driven data exchange structures (CCBDA data structures, documents and snippets of documents)”	Done
		612	TE		Replace “service/product suppliers” with “other suppliers / service providers”	Done
		661	TE		Replace “service providers/product suppliers” with “other suppliers / service providers”	Done

		701-815	ed	<p>The following entities in listed diagrams are accidentally missing though mentioned in the attached BIE excel file.</p> <p>7.1.1 Facility: <i>Event</i>  7.1.2 Location: <i>Geographical Coordinate</i>  7.1.3 Party: <i>Product, Batch, Material</i>  7.1.4 Process: <i>Event</i>  7.1.5 Product: <i>Classification, Event, Method</i>  7.1.6 Batch: <i>Event, Produce</i>  7.2 Inspection: <i>Characteristic, Standard, Inspection Result: Party</i></p> <p><i>Recommendation: adding missing entities or renaming of entities should be done after the harmonization process.</i></p>	Add ( <i>italic</i> ) entities to diagrams (were listed in BIE table)	Done
		845	te	Align the content of BRS with the decisions made on the naming of the data components by the Library Maintenance Focal Point	Remove “Colour Size Range” from the table	Done
		857	Ed	In the definition for CITES	Revise as follows: Convention on International Trade in Endangered Species of Wild Fauna and Flora, an international agreement between governments to ensure that international trade in specimens of wild animals and plants does not threaten their survival	Done
			GE/TE	Align the content of BRS with the decisions made on the naming of the data components by the Library Maintenance Focal Point		Done

Date submission:	Jan, 3 <sup>rd</sup> 2021
Submitted by:	Chiara MORELLI (Kering)

Please make all comments using this template.

Please propose suggested changes in order to make the Draft align with your comments (only those with proposed changes can be fully considered).

Ref. (leave blank)	Draft version number	Line numbers	Type of comment <sup>1</sup>	Comments	Proposed changes	Working Group Observations (leave blank)
	DATE: 3 November 2020 STATUS: Interim Draft v1	260 A-6	ge	Animal welfare should be included in the list of sustainability aspects taken into account	The manufacturing, marketing and use of garment, footwear and accessories, and its parts and components, taking into account the ANIMAL WELFARE, environmental, health, human rights and socio-economic impacts, and their continuous improvement through all stages of the product's life cycle	<p>The text in question is a quote and as such cannot be changed (quotation marks and the reference were put in footnote).</p> <p>There is a sentence about animals after this quote, it has been modified as follows: “Sustainability information also includes information about animal welfare and, where appropriate, measures to prevent the use of endangered species or illegally traded animals.”</p> <p>Added “See also Table 5-3 Sustainability Matrix.”</p>

	DATE: 3 November 2020 STATUS: Interim Draft v1	319 Fig 5-6	ge	Animal welfare is a key sustainability element when it comes to leather and fibers of animal origin. Consumers have posed specific attention on how animals are treated during farming and slaughtering.	Please add a bubble for animal welfare in the Figure	Done
	v2PubRev	545-548	te	At Kering, we don't think Blockchain should be a component of a traceability system, nor we don't think it should replace and be different to traditional data exchange. We recommend a layer based approach of using blockchain to favour interoperability. The most powerful blockchains that exist are not "part of business applications", they exist by themselves and are out of control of any identified business as they rely on a decentralised network of anonymous participants. This characteristic is the reason why the data recorded on those blockchain is trustworthy, as it is truly unmodifiable and incorruptible. There is no identified person or business that can be corrupted to corrupt the data. Therefore I would not reduce blockchain to component of a business	Blockchain or Distributed Ledger Technology (DLT) are infrastructures and softwares that can be use to notarise information. The more resilient ones are the more decentralised ones, involving the biggest number of nodes of the network as corrupting the data would require corrupting each of the nodes. Traceability systems can be connected to those blockchains using a layer based approach to certify information by creating immutable proofs of existence of this information. In addition to proofs of existence, in combination with enterprise identity management, those blockchains can certify the provenance of this information and therefore become powerful tool to make the traceability more trustworthy. Blockchains rely on open source code and standards, which make	The text has been replaced with the following:  "Blockchains provide a distributed ledger that registers transactions in a highly-trustworthy, time-ordered manner. In simple words, they provide proof that transactions that have happened and that the data have not been altered. Like the EPCIS solution, events are captured and recorded. Retrieving and verifying data is most often done using pointers to off-chain data and cryptographic hashes proofs of data content.

				<p>application. At Kering we use public blockchains (like Bitcoin) for business applications. We are already doing for our high end watch brand Ulysse Nardin, and to protect intellectual property of our brands.</p> <p>The rest of the paragraph starting at “Blockchains provide a distributed ledger...” line 548 is exact.</p>	<p>them compatible in terms of philosophy of interoperability with traditional data exchange and models.</p>	<p>Traceability systems/applications can be connected to blockchains using a layer-based approach in order to create highly trustworthy proofs of the existence and content of selected information. In addition, in combination with enterprise identity management, blockchains can certify the provenance of information and, therefore, be a powerful tool for making traceability more trustworthy.</p> <p>There are many different public and private implementations of blockchain technology, each with different characteristics. The public versions use open-source code and are considered by many, for technical reasons, to be the most trustworthy.”</p>
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	DATE: 3 November 2020 STATUS: Interim Draft v1	651	Ge	For exotic skins it is more common to use killing facility instead of slaughtering	For example, some luxury brands may own the farms, KILLING facilities and tanneries for exotic leather production	Slaughterhouse is the globally recognised term for the leather industry and exotics are only a small part of this industry.  No action
	DATE: 3 November 2020 STATUS: Interim Draft v1	668	Ge	For exotic skins it is more common to use killing facility instead of slaughtering	Please change 2. Slaughter into 2. Killing	Slaughterhouse is the globally recognised term for the leather industry and exotics are only a small part of this industry.  No action
	DATE: 3 November 2020 STATUS: Interim Draft v1	747	Ge	Animal welfare can be considered a sustainability characteristic of the animal as well as the country of origin. The manufacturing country is sometimes less important than the country of origin of the hide. It seems not best represented in the figure within the Sustainability box at the bottom, which is much linked to the product	We may add a box with “animal welfare” (a second one with country of origin, if possible) in the top of the picture, linked to individual animal or at the same level	The capability to encode this information is there. Individual sustainability areas, such as “animal welfare” are not included in this diagram, because they are coded as a “sustainability characteristic” (see bottom of diagram).  The implementation Guidelines, which are not yet developed, will provide information about code lists to be used. For

						<p>sustainability characteristics it is our intention to suggest use of the codes found in the ITC Sustainability database.</p> <p>The same is true for country of origin which can be coded within the data for “country”</p> <p>No action.</p>
	<p>DATE: 3 November 2020 STATUS: Interim Draft v1</p>	844	ge	<p>As important as crop protection, we might add a line for animal welfare certifications</p>	<p>ANIMAL WELFARE CERTIFICATION Organization Certification Specified Inspection Result</p>	<p>Added “Animal Certification” Within this entity one specifies the kind of certification, in this case indicating animal welfare.</p>

<sup>1</sup> 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)