

Template for comments and secretariat observations

Date: 2023-07-14

Document: **DIS 59020**
Circular Economy –
Measuring and assessing
circularity

Project: TC
323 Circular Economy

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
TT		3.1.1		ed	The definitions under sub clause 3.3. are wrongly numbered.	Re-do the numbering to align to the references in the text or vice-versa.	
TT		3.3.22	Note 1	ge	Suggest that Note 1 be made more expansive to accommodate the action taken for reused content.	Rephrase as follows: Note 1 to entry: Minimal alterations include cleaning or minor adjustments and or minor repair.	
TT		5.5		te	It needs to be made clear that the first assessment forms the baseline for the organisation. Include as a Note.	Place note after first paragraph: The first assessment forms the baseline for the organisation.	
TT		7.4	Paragraph 1	te	Consider including additional words. The word renewable (using alternate sources of energy) be included, since renewable products can require the use of non-renewable resources. Regeneration for instance use in agriculture - restoring soil to improved conditions, cleaning water, etc Look at 59004 standard to reference the definitions.	Include the words: renewing, recycling It should be noted that the terms 'adding', 'contributing', 'retaining', 'regenerating', 'renewing' and 'recycling' can result in negative quantifications.	
		7.4	Paragraph 1		The phrase negative quantification may not be adequately understood and should be explained or defined.	Definition needed:	
TT		7.6	Paragraph 1	te	To ensure that the information is accurate, the data needs to be validated.	Include: All data must be validated by a third party auditor	
TT		7.6	Paragraph 7	te	Companies need to determine what they need to measure for validation. There may be need for guidance on setting up data acquisition, as well as, use of experts to propose what needs to be	Include as a note: Organizations should determine ability to measure existing processes accurately, to avoid wastage of resources when validating data.	

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² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

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					measured and what needs to be validated by a third party.		
				ge	The Issue of measurement is important so this is a critical area that must be addressed by the standard.		
TT		7.6	Box on pg 23	ge	Cite other examples for data acquisition that can be used as models.		
TT		7.7	Paragraph 4	ge	Collection of data and calculating may not be practical for small businesses/economies due to its complexity. Should a systematic approach be outlined as guidance?	Include as a new point: Collaboration, agreement and alignment for multi stakeholders must be adopted to avoid hurdles.	
		8.2	Figure 10	te	Make the figure circular as the assessment is an ongoing process based on the PDCA cycle.		
TT	pg 29	8.4.2 Example		ed	Remove dash and include a space: new bottles. The economic cost of a recycled and virgin glass and.....	to read: bottles. The economic cost of a recycled and virgin glass.....	
TT							
TT		8.4.8		ge	Consider that if these are the only circular actions that can lead to the creation of new jobs, should it be more expansive? The wording is too finite. Circular actions for repair, refurbish, remanufacture, recycle can create new jobs	Restate as follows: Circular actions including repair, refurbish, remanufacture, recycle can create new jobs	

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TT		A.3.5.	pg 40 , 4th paragraph	ed	Should this be one or two separate points? — a substance or material can — only be returned into the biosphere in compliance..... If it's two points then the first is incomplete; if one, then they should be joined.	Reword to: — a substance or material can only be returned into the biosphere in compliance.....	
TT		A.5.1.a		te	Include an example to provide clarity.	Include Example: Water needs for recycling products may outweigh the water available to the community and therefore have a negative impact on other users. Example: The use of washable tableware by restaurants, where there are over a certain number of diners, may result in increased water use.	
TT		B.4.2 and E.2		ge	Need to move away from energy recovery and landfill waste energy. Indicate that waste to energy is considered to be a last resort. Waste energy recovery is necessary but can be misconstrued or taken out of context. There needs to be planned obsolescence of plants, in the long term, in such a way that there is no increase in waste to energy recovery. Whilst it is a necessary component of the circular formula, over time, it should become less and less necessary and should be planned in the establishment of these facilities.		

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TT				ge	The same principle should be applied to landfill waste, as above.		
TT	g.1 c.				typo - represents	represented	

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