



Title BES 6001 Public Consultation Comments
Date September 2022
Revision 1.0

BES 6001 Framework Standard for Responsible Sourcing, Version 4.0

BRE Response to Public Consultation Comments
September 2022

BRE Global Ltd (BRE) have reviewed and updated the BES 6001 Framework Standard for Responsible Sourcing.

A draft version of version 4.0 of BES 6001 was put out for public consultation from 08 November 2021 to 31 January 2022. Once this feedback had been reviewed, a second draft was put out for consultation from 19 May 2022 to 19 June 2022.

The comments have now been compiled and listed anonymously in the table below, along with the BRE responses.

Every effort has been made by BRE to respond to the comments received, and minor revisions have been made to the standard as and where necessary.

BRE would like to thank all those who participated in this public consultation process.



08 November 2021 to 31 January 2022 Consultation Period				
	Section	Type	Proposed change	BRE Response
Type of comment: G = general T = technical Ed = editorial				
1	Generic	Editorial	BS EN ISO 14001:2015 & BS EN ISO 9000:2015 Definitions to be revised in line with most recent ISO standards (e.g., 2.18. Organisation).	Definitions have been updated.
2	Generic	Editorial	Section 2.13: freely and publicly available means that the relevant sustainability information shall be effectively communicated, made freely and publicly accessible on-line (e.g., web page, statement in policy, Annual Report or Sustainability Report) AND shall be available in other formats (e.g. printed) if requested. It needs to be readily available to employees, contractors, and other workers on site as well as to all interested external stakeholders in a format and languages that are appropriate to stakeholders.	Definition confirms information must be available in an appropriate format to <u>all</u> stakeholders.
3	Generic	Editorial	Section 2.36: ISO 9000:2015 - 3.6.13. Definition to be described in detail	Definitions have been updated.
4	Generic	General	FOREWORD: To provide a clear and quantifiable route to obtaining credits within the Materials sections of the Code for Sustainable Homes and with most popular Green Building certification schemes (such as BREEAM, LEED and DGNB). Increase: • added value of BES 6001 in international Green Building certification schemes • transparency on BES 6001 scoring in Green Building certification schemes (through a publicly available calculation algorithm).	Foreword amended to include Green Building certification schemes.
5	Generic	Editorial	Section 2: Include definitions for Tier 1 and Tier 2 suppliers. Missing definition for these two categories. Using clear definitions helps to prevent misunderstanding.	The reference to Tier 1 & Tier 2 has been removed and therefore they no longer require defining.
6	Generic	Editorial	Section 2: Define or eliminate "biome".	Definitions have been updated.
7	Generic	Technical	Missing Guideline for BES 6001 application. Clarification supplementary information should preferably be set out in a Guideline for BES 6001 application – publicly available for construction products manufacturers. Thus, increasing BES 6001 rollout.	The Guidance Document for BES 6001 is available via GreenBookLive: GreenBook Live: BES 6001 The Framework Standard for Responsible Sourcing . The guidance document (once updated) will continue to be published on GreenBookLive along with the final version of BES 6001 V4.0
8	Generic	General	Align waste definitions with new (draft) circular economy terms and definitions as below: 3.11.1	Waste definition remains unchanged.



			<p>pre-consumer waste material, resulting from a production process which has to undergo a recycling or recovery operation, or contains contaminants that need to be removed before it can be further used or processed, [SOURCE: Brussels, 21.2.2007 COM (2007) 59 final COMMUNICATION FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN PARLIAMENT on the Interpretative Communication on waste and by-products]</p> <p>Note 1 to entry: included is processing waste that has been substantively adapted/reformulated prior to reprocessing, excluded are by-products (3.1)</p> <p>Note 2 to entry: substantively adapted and reformulated prior to reprocessing refers to:</p> <ul style="list-style-type: none"> • unintentionally produced material which is sorted and re-mixed with other compatible material or virgin materials before being reintroduced into the process or which has to be reformulated with the addition of new additives and compounds resulting for example in new granules or feedstock which then can be reintroduced into the new process. • unintentionally produced material which has to be disassembled by separating layers, before being reintroduced into the process. <p>[SOURCE: Adapted from EN ISO 14021: 20168, definition 7.8.1.1 a)]</p>	
9	Generic	General	Section of scoring methodology missing. This was section 5 in the BES 6001 v3.1 standard. Scoring methodology required for transparency of scoring.	This consultation was on the content of the standard. The final version will be shared with the scoring included.
10	Generic	General	Is there a way of mapping other management system requirements (e.g., EcoVadis, FSC/PEFC, etc.) to certain requirements of BES 6001 to ease the certification burden? Organisations are under a lot of pressure to have a number of certifications for products, so if there is any way requirements could be transferred from one to another this should be implemented.	BRE will continue to work to ensure that BES 6001 is recognised in sustainable product and building schemes.
11	Generic	General	The direction and purpose of the changes are not clear and insufficient information has been made available to offer an explanation or justification for the changes. At present, too many unknowns exist, resulting in multiple options being possible, thus resulting in multiple comments being raised for each clause (particularly sections 3.2 & 3.3). Reference is made to Tier 1 & 2 suppliers without any definition of these new classes/tiers, or examples of how the tier system would be applied to different industry sectors. An additional layer of definitions in relation to traceability has been introduced under 3.3.1. This is contradictory with regard to the linked sections 3.3.2, 3.3.3 & 3.3.4 of the standard, and to the initial overriding definitions	This consultation was on the content of the standard. The final version will be shared with the scoring included. Several amendments have been made to the content of the standard and the associated guidance document will be made available to provide more in-depth clarification of the requirements.



			<p>given within section 3.3 (page 19 main introduction). A greater emphasis has been placed on auditing suppliers in terms of following up on all supplier's information (or lack thereof) rather than being able to discount small percentages as irrelevant. This has been taken to the extreme in terms of section 3.3.4. External verification is more prevalent within section 3.4 but is inconsistent in its application. The scoring system is not included within the draft, thus making it virtually impossible to assess the impact of the draft changes relevant to existing certification grades (i.e., pass, good, very good or excellent). A further draft (after inclusion of the consultation comments) should be circulated for comment with this critical section included, allowing further review.</p>	
12	Generic	General / Technical	<p>3.3.2 - 3.3.4: Consider how such requirements apply to SMEs that follow already established stewardship schemes that are embedded into national standards (e.g. UKWAS for forestry) that deal with legal, environmental, management, people & communities & workers and sustainability issues in a sector specific manner for the supply of raw materials to larger industry.</p> <p>Certification to the management systems throughout the standard is biased to larger organisations that can justify the time and expense for their complex operations, whereas smaller (SME) organisations will not be able to justify the time and cost for so many management systems being managed and certified.</p> <p>The wood sector has a large proportion of SMEs and has its own forest stewardship standards that material suppliers follow and are certified to. However, to also be certified to other management systems is not always justifiable especially for small forest owners where it is sometimes difficult to find them with the forestry specific certification, let alone much more complex management systems in place and certified.</p> <p>As an example, in the UK the UKWAS standard serves the wood sector well for its specific needs regards sustainability and forest stewardship resulting in the supply of sustainable and ethical wood. We acknowledge that BES 6001 covers more aspects than UKWAS will but there will be issues of raw material supply to the larger businesses that are likely to be certified to BES 6001 where suppliers have too many burdens in terms of management system requirements and certification.</p>	<p>Clarification regarding equivalent methods of obtaining credits/equivalent standards have been outlined where necessary in the standard and guidance document.</p>
13	Generic	General	<p>The potential penalising of SMEs in the supply chain as they are less likely to be accredited to various management standards especially ISO standards.</p>	<p>Clarification regarding equivalent methods of obtaining credits/equivalent standards have been outlined where necessary in the standard and guidance document.</p>



14	Generic	General	Those sectors / companies pursuing a circular economy approach and sourcing secondary materials often find these come from SMEs in the supply chain, leading potentially to less points in the standard from "doing the right thing" Seems perverse.	Equivalent accepted forms of evidence have been included for SMEs. Details found in guidance.
15	Generic	General	That Biodiversity – whilst an important topic to now include - seemed to have a disproportionate number of points allocated to it.	Scoring has been clarified.
16	Generic	General	Material traceability – how far is reasonable.	Traceability requirements have been clarified in the guidance document.
17	Generic	General	The rapidly changing landscape of sustainability reporting, the increasingly global nature of that reporting, and the potential need to map the numerous different schemes across to this BRE standard. Much had changed since BES 6001 was first issued in 2008. The TCFD for instance goes way beyond the demands of BES 6001.	BRE will continue to work to ensure that BES 6001 is recognised in sustainable product and building schemes.
18	Generic	General	Even the more esoteric question was raised of should the Standard be just a Pass / Fail system rather than different levels of award.	Although this is not going to be the case for this version of BES 6001, it is something we will consider moving forward.
19	Generic	General	Not a great deal of consistency for scores relating to target setting, some are required to score 1, others for 2 score, also the Waste section the target setting, and reporting are in the same clause, why is this singled out as different?	Amendments have been made to improve consistency.
20	Generic	General	Section 3.4 (3.4.1.2, 3.4.2.2, 3.4.4.2, 3.4.5.2, 3.4.8.3, 3.4.12.2) - This section may need to be re-designed as not all the sustainability/ environmental impact & aspects identified in that section are currently crucial or "material" for some product sectors. For impacts and aspects which are not "material" it is unlikely that the product manufacturer will have a target (e.g., water target for a product which requires very little or no water in manufacture, etc, biodiversity target for a factory placed in an industrial park, etc). We suggest that a materiality assessment is introduced in this section to help assessors, and those assessed, identify a fixed number of aspects, and impacts relevant to them.	Amendments/additions have been made to make sections more appropriate for all organisations.
21	Generic	General	Section 3.4 - There is a need for some guidance on what standards and verification procedures are needed for some of the aspects included in this section (e.g., material circularity standard, e.g., external verification on waste management systems, etc). Add more guidance in the detailed Guidance document on any verification standards, verification schemes (Eco-Platform for EPD) or external verification processes and how these are achieved.	The standard confirms the external verification credits require the following: The organisation shall provide for external verification that the data and information that it communicates to stakeholders fulfils its stated purpose and is accurate. This shall be undertaken by an independent, competent third party. The inclusion of a material circularity standard has been removed from the standard and the ECO-platform is not a verification scheme, but simply an EPD listing platform.



22	Generic	General	Foreword: Remove/amend “Code for Sustainable Homes”. The Code has been withdrawn from use. Other schemes may have partially taken its place.	This has been removed.
23	Generic	General	2.19: Organisation reference should be 2.18. Reference error	This has been amended.
24	Generic	General	Introduce a ‘Pass/Fail’ system rather than different levels of award. Would this mean the removal of the “non-compulsory” clauses? Yes, however these could be set out as part of the road map for future development of the standard. While this consultation is not about the scoring system per se, we think that a more straightforward ‘Pass/Fail’ system would be preferable to the current system with different levels of award. For organisations that do not manufacture but, for example, provide kits for final manufacture, there is a limit to the level that they can reach, which may be despite their wider responsible sourcing credentials and actions, making a simple ‘Pass/Fail’ fairer and therefore preferable.	Although this is not going to be the case for this version of BES 6001, it is something we will consider moving forward.
25	Generic	General	It is difficult to properly judge the effect of these changes when you have not shown the scoring grades in the draft standard. Also, is there a published scoring mechanism for how the BES 6001 score fits into the BREEAM scoring?	This consultation was on the content of the standard. The final version will be shared with the scoring included. Once the standard is finalised and published, the BREEAM scoring mechanism will be detailed.
26	Generic	General	Reconsider traceability requirements. For some points to be achieved, manufacturers could switch to larger suppliers who have greater resources for being able to prove a greater level of traceability. Using larger suppliers goes against the ethos of responsible sourcing.	Clarification regarding equivalent methods of obtaining credits/equivalent standards have been outlined where necessary in the standard and guidance document.
27	Generic	General	Section 3.4: Change the format of this section by introducing a materiality assessment so that impacts, and targets can be relevant to each manufacturer. Under current design, manufacturers may be given targets that are irrelevant or unachievable. Under the current proposal, there’ll be impacts and targets that will be cumbersome and/or irrelevant to some manufacturers.	Amendments/additions have been made to make these sections more applicable to all organisations.
28	Generic	General	Very difficult to comment on the current changes to the standard without understanding how this will reflect on the overall scoring. Some concrete suppliers have contracts with obligations linked to specific BES 6001 ratings and it would be very important for these companies to understand the implications of changes in full and how would this affect ratings. As some companies have contracts in place linked to specific BES 6001 ratings, it is important that the implications of all these changes on the ratings and RSCS scores is understood. Any significant change to the rating structure (e.g., switch to simplistic pass/ fail rating) could affect ongoing contract and is unlikely to offer sufficient incentive for certified companies to improve.	This consultation was on the content of the standard. The final version will be shared with the scoring included.
29	Generic	General	Section 3.4: This section may need to be re-designed as not all the sustainability/ environmental impact & aspects identified in that section are currently crucial or “material” for some product sectors. For impacts and aspects which are not “material” it is unlikely that the	Amendments/additions have been made to make these sections more applicable to all organisations.



			product manufacturer will have a target (e.g., water target for a product which requires very little or no water in manufacture, etc, biodiversity target for a factory placed in an industrial park, etc). We suggest that a materiality assessment is introduced in this section to help assessors, and those assessed, identify a fixed number of aspects, and impacts relevant to them.	
30	Generic	General	Global Warming is a key sustainability issue and may need to be awarded more points, at least as much as biodiversity (at 10 points) for example. Reconsider awarding more points to GHG emissions.	The GHG clause is worth the most credits at 5. Biodiversity is worth less than this.
31	Generic	General	Transition to pass/fail standard Responsible sourcing as an issue has moved on apace since the conception of the standard and supply chain risks and management are far better understood. There is an opportunity for BES 6001 to act as the benchmark for what really matters instead of pitching manufacturers into competition with one another over who is 'better'. Within construction products there is an enormous diversity of sectors, industries, and companies of all sizes. While the standard is capable of drawing together the common principles of what it means to source responsibly, rating efforts as good/very good/excellent becomes a subjective exercise as issues will vary in relevance and importance across different types of businesses.	Although this is not going to be the case for this version of BES 6001, it is something we will consider moving forward.
32	Generic	General	Reference to internationally applicable governance and performance ratings and standards (e.g., TCFD, SBTi, Trucost ratings, MSCI ratings, Sustainalytics) Larger companies that operate internationally will look to align to standards and pursue performance ratings with international applicability which will sometimes far exceed the requirements of BES 6001. Introducing a separate reporting and audit mechanism for achieving BES 6001 criteria will not lead to better outcomes with respect to responsible sourcing. Giving due regard to international reporting and ratings by deeming compliance with the relevant elements of the BES 6001 standard simplifies the certification process and improves the marketability of the standard.	BRE will continue to work to ensure that BES 6001 is recognised in sustainable product and building schemes.
33	3.2.1	Editorial	Clearly define "regular basis". Annually? Once at every 2 years? What if there is no need to update the policy (no organisational change, no new requirement, etc)?	Criteria updated to clarify policy review requirements.
34	3.2.1	Editorial	This section says '... responsible sourcing principles described in Section 0 of this standard'. This should be 'Section 4'.	Criteria updated to reference correct section.
35	3.2.1	General	Note that 4.18 'Financial stability', has been added, stating "Manage for long term financial performance. Provide stability and enable long term investment in social and environmental aspects which underpin the economy." Companies can easily develop a sentence or paragraph to meet this requirement without having to prove this during an audit, as no financial gearing or stability criteria has been	Section 4.18 & 4.19 were included in V 3.1/3.2 also. Section 4.19 is audited in 6001 as we look at various sustainability criteria and sustainability of materials. Although financial stability is not directly audited, it is a key part of sustainable



			<p>specified. Thus, the auditing organisation cannot easily assess this requirement or the specific company performance against it. Similar to the above, we note that 4.19 'Contribution to the built environment', has been added, stating "Develop products that improve the quality and sustainability of the built environment". Again, a sentence or paragraph can be included within a policy statement to meet this requirement</p>	<p>development and is required in order to progress an organisation's sustainability goals and objectives.</p>
36	3.2.2	Technical	<p>Change name of the section 'Compliance Obligations', see definition in ISO 14001:2015 3.2.9 On top of 'legal requirements', 'other requirements' to be added. Other requirements are part of the compliance obligations</p>	<p>Criteria title updated for consistency with ISO 14001 and ISO 45001</p>
37	3.2.2	General	<p>All applicable regulations would include many that are out of the scope of the 6001 standard. Rephrase to all regulations relevant to the scope of BES 6001.</p>	<p>Criteria clarified. Requirements now relate to process in place and laws relevant to responsible sourcing</p>
38	3.2.2	Technical	<p>Specify regulations for the point(s) to be achieved. Criteria too vague.</p>	<p>Criteria clarified. Requirements now relate to process in place and laws relevant to responsible sourcing</p>
39	3.2.2	Technical	<p>Proving proof of compliance to "all applicable local, national, and ratified international laws and regulations..." can be a significantly difficult task for any company. The legal register of a company or site is unlikely to address every single piece of local or international law requirement and companies would adhere to many laws by default. There is a need to revise the wording to ensure that a realistic process is in place to check on the legal compliance of a company. Amend the text, for both within the standard and any guidance document associated with it, accordingly. The guidance document was previously only available to certification bodies it needs to be made available to certificate holders</p>	<p>Criteria clarified. Requirements now relate to process in place and laws relevant to responsible sourcing. The Guidance Document for BES 6001 is available via GreenBookLive: GreenBook Live: BES 6001 The Framework Standard for Responsible Sourcing. The guidance document is also being updated and will continue to be available on GreenBookLive, alongside the standard.</p>
40	3.2/3.3	Technical	<p>We would refrain from strictly requesting compliance with one specific ISO standard without giving the companies possibility to use equivalent requirements. Particularly SMEs do not have all ISO certificates in place. Change "are certified to a recognized standard" to "a recognized standard or complying to equivalent requirements"</p>	<p>Due to demand for ISO recognition, reference to ISO standards have been included. However, clarification regarding equivalent methods of obtaining credits/equivalent standards for SMEs have been outlined where necessary in the standard and guidance document.</p>
41	3.2.3	Technical	<p>Clarify the meaning of "reviewable actions for going beyond minimum legal compliance". What could be considered as evidence for this requirement? By simply applying for BES 6001 certification, we are going beyond min legal compliance</p>	<p>This credit has been removed.</p>
42	3.2.3	Technical	<p>This clause is extremely vague, and it is unclear to which standards the clause is referring to. Additionally, there is no definition of risk pertaining to responsible sourcing or wider management systems.</p>	<p>Text and guidance document updated to include ISO standards. Additional credits also included in this section to ensure those with ISO themselves, are awarded higher credits.</p>



			<p>In terms of BS EN ISO 9001, BS EN ISO 14001 & BS ISO 45001, these standards already have specific 'risk & opportunity' sections within them. Companies that are certified to these standards should not have to prove additional 'undefined risk' parameters and actions to satisfy BES 6001.</p> <p>The clause currently states: The organisation shall have in place a documented management system(s) to implement its responsible sourcing procedures, and which includes in its scope the assessed product. AND The organisation can demonstrate that it operates a risk management process and an audit programme; and where risk management activities leave a residual risk to the organisation there are plans to mitigate or manage the risk in the future.</p> <p>At present, references to the organisation seeking BES 6001 certification having to possess 'IAF' BS EN ISO 9001, BS EN ISO 14001 & BS ISO 45001 have been removed from these sections (previously present within BES 6001 Issue 3.1), which is a major step backwards, thus allowing companies to obtain full points based purely upon their supply chains' IAF status rather than their own as well as that of their supply chain.</p> <p>The previous section 3.2.3 within BES 6001 Issue 3.1 was perfectly well defined and was more usable and useful.</p>	
43	3.2.3	Technical	<p>How does the organisation demonstrate it has gone beyond minimum legal compliance? What number of reviewable actions are required to achieve this and gain the actional point? Examples required. What is beyond ISO 9001 compliance?</p>	This credit has been removed.
44	3.2.3	Technical	<p>3.2.3.2 - There may be a need to list the group of "recognised standards" it would accept. There is concern that not all management systems may be as robust as the ones certified to ISO standards. Our certification body has never accepted alternative standards from our suppliers, in the end we gave up even trying to convince them of their merits. Only ISO was deemed acceptable.</p> <p>3.2.3.3 - Unclear what is meant by "beyond minimum legal compliance" as management systems aligned to ISO 9001, ISO 14001, etc. already go beyond legal compliance. Need further information about how this demonstration may take place.</p>	Text and guidance document updated to include ISO standards. However, 'equivalent' schemes also included so if your suppliers have alternative schemes that were proven to be 'equivalent', this will be acceptable. Credit 3.2.3.3 has been removed.
45	3.2.3	General	<p>Replace with "actions which are reviewed" if that is the intended meaning. Meaning of "reviewable actions" is not clear</p>	This credit has been removed.
46	3.2.3	General	<p>Perhaps refer in the Auditor Guidance to the legal procedures established under 3.2.2.1 as a definition of minimum legal compliance "going beyond minimum legal compliance" may be subjective, especially if the auditor does not have specialist legal knowledge</p>	This credit has been removed.



47	3.2.3	General	Details of risk management process and audit programme. What is deemed a suitable "risk management process and audit programme"? What principles should this follow? E.g., PRINCE2? Is this an internal audit programme? Some examples might help here, followed up with more detail in the later guidance.	Clarification included in guidance document.
48	3.2.3	Technical	Name some suitable standards. Too vague. What standards are applicable?	Text and guidance document updated to include ISO standards.
49	3.2.3	Technical	Explanation or examples required. How is this measurable? "Beyond legal compliance" with which laws?	This credit has been removed.
50	3.2.3	Technical	Specify which management systems will be accepted. Not all management systems require the same standards. The same number of points could be given to organisations whose management systems go beyond that of others such as ISO.	Text and guidance document updated to include ISO standards.
51	3.2.3	Technical	There may be a need to list the group of "recognised standards" it would accept. There is concern that not all management systems are as robust as the ones certified to ISO standards. Restrict recognition to ISO or equivalent standards or offer further information (list) of acceptable standards in the main BES 6001 document (or Guidance).	Text and guidance document updated to include ISO standards.
52	3.2.3	Technical	Unclear what is meant by "beyond minimum legal compliance" as management systems aligned to ISO 9001, ISO 14001, etc. already go beyond legal compliance. Need further information about how this demonstration may take place.	This credit has been removed.
53	3.2.4	Technical	We would refrain from strictly requesting compliance with one specific ISO standard without giving the companies possibility to use equivalent requirements. Particularly SMEs do not have all ISO certificates in place. Change "The organisation can demonstrate that it has reviewed its procurement processes against ISO 20400" to: "The organisation can demonstrate that it has reviewed its procurement processes against ISO 20400 or equivalent"	ISO 20400 is a guidance standard not a compliance standard and we therefore do not expect certification.
54	3.2.4	Technical	Keep the previous exemption of 2% of material sources outside the UK/EU or OECD as per BES 6001 3.1 version. 100% of constituent materials are now covered by the requirements (same risk assessment requirements as the previous BES 6001 3.1 version). However, the previous exemption of 2% of material sources outside the UK/EU or OECD no longer exists. This may cause an issue in terms of the linked elements of 3.3.1, 3.3.2, 3.3.3 & 3.3.4 (explained in more detail within those specific sections herein) as this is now compulsory.	Requirement relating to risk assessments and due diligence for suppliers based outside the UK/EU/OECD included in line with previous versions of Standard
55	3.2.4	Technical	Review the requirement for the reference to ISO 20400, should ideally be removed from BES 6001 as it serves no real purpose. If ISO 20400 reference is kept then suggested that an Appendix is added to the BES 6001 manuals to cater for this, with a further statement under section 3.2.4.2 referring to the latest review date and authority. ISO 20400 is a guidance standard; therefore, you can't get certified against it. Having assessed the document, I feel it is poorly written, too vague, and merely	ISO 20400 is a guidance standard, not a compliance standard and we therefore do not expect certification. Criteria has been clarified and guidance doc outlines requirements. Higher credit still requires procurement processes to align with the principles of ISO 20400.



			<p>collates different requirements from existing standards into one document, which results in repetition of effort and duplication for those organisation’s already tackling sustainability issues via BS EN ISO 14001, BES 6001 and ISO 14064-1.</p> <p>Reference to it should ideally be removed from BES 6001 as it serves no real purpose.</p> <p>Notwithstanding the above, as the company is now required to demonstrate a review process, this will require additional documented evidence of such a review and proof that the review meets the requirements of ISO 20400. Thus, it is suggested that an Appendix is added to the BES 6001 manuals (currently written) to cater for this, with a further statement under section 3.2.4.2 referring to the latest review date and authority.</p>	
56	3.2.4	Technical	<p>Include an appendix detailing the specifics of BS 13500. This will enable the company to prove that the established code meets the requirements.</p> <p>BES 6001 Issue 4 should ideally detail the exacting requirements of the ‘code’ and include a specific definition of this to avoid any confusion in terms of implementation and onward auditing With regard to the required ‘code of conduct’ for suppliers, BES 6001 Issue 4 refers to BS 13500:2013 Code of practice for delivering effective governance of organizations.</p> <p>This is largely met via existing Business Ethics policy statements and the statements made within the existing manual. However, specific reference to BS 13500 should now be made, with a further Appendix required to details the specifics of this standard. This will enable the company to prove that the established code meets the requirements.</p> <p>Notwithstanding the above, BES 6001 Issue 4 should ideally detail the exacting requirements of the ‘code’ and include a specific definition of this to avoid any confusion in terms of implementation and onward auditing. Auditors should not be forced to apply their opinion or interpretation as this will cause confusion and an uneven playing field</p>	<p>The Code is for an organisation’s requirements for their suppliers. Therefore BS 13500 is not relevant.</p> <p>Further clarification has been included in the guidance document.</p>
57	3.2.4	Technical	<p>Exemptions and automatic awarding of points should exist within this clause. It is not clear here what could and could not be considered as “training”. This point needs further explanation as maintaining BES 6001 certification requires some staff training.</p> <p>This refers to training of the supply chain. This suggests that the primary company seeking certification must prove that training on the principles of responsible sourcing has been given to its supply chain.</p> <p>However, there is no automatic award of these points if/when the supply chain are already certified to either BES 6001 or BS EN ISO 14001. This is unfair, as companies that already hold this level of certification do not require training.</p> <p>This thereby does not automatically reward primary companies that already select supply chain partners that already conform to responsible scouting principles. Exemptions and</p>	<p>Guidance document confirms for suppliers who are certified to BES 6001, engagement is not expected.</p> <p>Credit been amended to confirm it is not simply training, but ‘capacity building’. Guidance document provides examples.</p>



			automatic awarding of points should therefore exist within this clause and the clause must clearly define what could be considered as “training” including examples	
58	3.2.4	General	Please clarify the requirements concerning ISO 20400. Please clarify whether the principles of ISO 20400 are to be followed, or whether certification to ISO 20400 is required.	Guidance Document includes further details.
59	3.2.4	General	Suppliers’ Code of Conduct – please provide further details. Is it possible to set out the principles of this Code of Conduct, or is a template to follow? Or only further guidance?	The guidance document details what may be included in the code. However, it will be specific to each organisation, their processes, and requirements.
60	3.2.4	General	Please clarify how an organisation is to demonstrate support for training, and how far along the supply chain that support is expected. How far along the supply chain is the organisation to demonstrate support for training on responsible sourcing principles, and how will this be achieved?	Criteria updated for clarification and guidance document to include examples of evidence to be seen. It isn’t training per say, but capacity building and may involve workshops, supplier meetings, forums, regular digital communication sharing best practice etc.
61	3.3	General	3.3.1 refers to 100% traceability of constituent materials, 3.3.2.1 refers to “a minimum of 60% of the constituent materials” 3.3.3.1 refers to “100 % of the constituent materials” 3.3.4.1 refers to “100 % of the constituent materials”. We suggest aligning these back to 60%	Minimum traceability requirements have been amended and reduced from 100%.
62	3.3	General	Does Tier 1 include traders? Can a trader be considered Tier 1? If a trader cannot be considered Tier 1 the new 3.3.1 will be impossible to comply to some companies. 100% traceability is difficult to comply for companies using recyclets (Using recycled material in the product).	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are included in the standard.
63	3.3.1	Technical	This requirement is too stringent particularly for companies operating with a lot of constituent materials. We suggest keeping it at the level of 60%. 100% traceability is difficult to comply for companies using recyclets (using recycled material in the product). We suggest aligning the level back to 60%.	Section 3.3.1 has been removed.
64	3.3.1	Editorial	Replace “maximum traceability” with “country” boundary.	Section 3.3.1 has been removed.
65	3.3.1	Technical	This whole section to be removed as it is confusing and contradictory. This section appears to link to 3.3.2 but is completely contradictory and confusing. It does not seem to add value to the standard.	Section 3.3.1 has been removed.
66	3.3.1	Technical	The new Tier references should be removed. This section should be removed in its entirety 3.3.1.1 states that “100% of the constituent material(s) of the assessed product(s) shall be traceable to Tier 1 suppliers.” and that this is compulsory. No definition of Tier 1 or traceable exist within BES 6001 Issue 4. This is poorly written and is	Section 3.3.1 has been removed.



		<p>subjective. From various external sources Tiers are defined as below:</p> <ul style="list-style-type: none">• Tier 1 - Partners that you directly conduct business with (i.e. buy from)• Tier 2 - Sources where Tier 1 suppliers get their materials• Tier 3 – Raw materials supplied to Tier 2 <p>BRE have indicated only 2 Tier levels, presumably with Tier 2 & 3 being classed as the same. Within the concrete and aggregate industries, Tier 2/3 suppliers almost always meet the Tier 1 criteria also. This eventuality has not been catered for within the draft standard.</p> <p>As there is no definition of 'traceable' within this section (which was previously defined under the specific sections 3.3.1, 3.3.2 & 3.3.3), there is no way for the company or auditor to define what is traceable and what isn't.</p> <p>This whole requirement or extra layer of administration seems completely irrelevant and unnecessary, and will only lead to confusion, as the introduction to section 3.3 already states: For each of the following sub-sections, constituent materials shall be traceable to the supplier(s) responsible for:</p> <ul style="list-style-type: none">• The extraction of raw materials; or• The recovery of recycled materials; or• The production of by-products; or• The processing of commodity traded material <p>This is sufficient and has not changed from BES 6001 Issue 3.1, therefore the new Tier references should be removed.</p> <p>As an example, a Tier 1 company could be completely irrelevant/superfluous in terms of the traceability of a raw material if that Tier 1 company does not produce the product and merely sells it on. All that matters is that the raw material has the suitable IAF certification status in place. The intermediaries that may sell the product do not have any impact or influence on the product's sustainability or responsible sourcing.</p> <p>If only Tier 1 traceability is now required, then this could be a major step backwards, requiring certification to BS EN ISO 9001, BS EN ISO 14001 & BS ISO 45001 ONLY for suppliers or intermediaries, rather than the producer of the raw material.</p> <p>Conversely, if Tier 1 supplier is both the supplier and the raw material producer, then this requirement is a major tightening of the standard, requiring 100% of suppliers to be traceable. This would result in a number of smaller companies not holding suitable certification being</p>	
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			<p>either excluded from the purchasing system of the company requiring certification, or the company requiring certification itself not being able to achieve BES 6001 compulsory levels.</p> <p>The previous Issue 3.1 definition of 'traceability' was: The following mechanisms shall be considered appropriate for demonstrating traceability: The organisation responsible for the constituent material(s) at each stage of the supply chain shall be certificated by an accredited organisation to ISO 9001; or Equivalent documented evidence of traceability as documented in guidance notes. Where there is already an established industry benchmark this shall be taken as the 'compulsory' level. An independently audited full chain of custody scheme to the raw materials source of the constituent material(s) satisfies the requirement for traceability.</p> <p>This has been totally lost.</p> <ul style="list-style-type: none"> • 3.3.1 states 100% Tier 1 traceability is compulsory • 3.3.2 then goes on to state that 60% Tier 1 traceability is compulsory. <p>Therefore, this is completely contradictory, recommend removing this section in its entirety.</p>	
67	3.3.1	Technical	<p>3.3.1.2 States "The organisation has mapped its supply chain for the assessed product(s) beyond Tier 1 and carries out regular risk assessments in relation to the potential for environmental and social risks. Again, the introduction to section 3.3 already states: For each of the following sub-sections, constituent materials shall be traceable to the supplier(s) responsible for:</p> <ul style="list-style-type: none"> • The extraction of raw materials; or • The recovery of recycled materials; or • The production of by-products; or • The processing of commodity traded material <p>This is sufficient and has not changed from BES 6001 Issue 3.1, recommend removing this section.</p>	Section 3.3.1 has been removed.
68	3.3.1	Technical	<p>3.3.1.3 States "The organisation has mapped its supply chain for the assessed product(s) to the maximum traceability boundary and carries out regular risk assessments in relation to the potential for environmental and social risks" The introduction to section 3.3 already states: For each of the following sub-sections, constituent materials shall be traceable to the supplier(s)</p>	Section 3.3.1 has been removed.



			responsible for:• The extraction of raw materials; or• The recovery of recycled materials; or• The production of by-products; or• The processing of commodity traded materialThis is sufficient and has not changed from BES 6001 Issue 3.1. The 'maximum traceable boundary' is the raw material, recommend removing this section.	
69	3.3.1	General	3.3.3.1 - This is not a realistic requirement, 100% would mean we need positive evidence that every single supplier has been asked if they have an EMS no matter the amounts of material they supply. This must change. 90% is a sensible figure to use.	Section 3.3.1 has been removed.
70	3.3.1	Technical	The "100%" requirement may be significantly difficult to achieve for companies with extensive supply chains, especially if such companies need to deal with many regional SMEs for their different sites' products' supply (especially if on a one-off basis)!	Section 3.3.1 has been removed.
71	3.3.1	Technical	Define within BES6001 (not the guidance) the definition of "traceability boundary" and with reference to the point of recovery of secondary materials. The meaning of "maximum traceability boundary" is unclear and potentially subjective. There is also a risk of penalising the use of secondary materials, typically having multiple supply streams and diffuse traceability	Section 3.3.1 has been removed.
72	3.3.1	Technical	Define "Tier 1" and ("Tier 2") in Section 2. Define "maximum traceability boundary". While there may be a common understanding of these terms, for the avoidance of doubt they should be defined in Section 2. What differentiates a Tier 1 from a Tier 2 supplier, for example? How is an auditor supposed to assess this?	Section 3.3.1 has been removed.
73	3.3.1	Technical	Further guidance on the risk assessment process is needed. What forms a "regular risk assessment"? Should there also be evidence of suitable action plans and actions taken where higher risks are identified?	Section 3.3.1 has been removed.
74	3.3.1	Technical	Reconsider the 100% target. The 100% target is likely to be impossible. Some companies may also have their own assessment systems of suppliers which should be considered.	Section 3.3.1 has been removed.
75	3.3.1	Technical	The "100%" requirement may be significantly difficult to achieve for companies with extensive supply chains, especially if such companies need to deal with many regional SMEs for their different sites' products' supply (especially if on a one-off basis)! Reconsider the 100% or reconsider how that requirement/ rule is imposed,	Section 3.3.1 has been removed.
76	3.3.1	Technical	What is meant by "maximum traceability boundary"? If it means Tiers 2/ 3/ etc suppliers, then this needs to be explained. Reword or add note explaining what is meant by maximum traceability boundary. There is also a need for clear guideline on this, so it doesn't depend only on perceptions of the auditor.	Section 3.3.1 has been removed.



77	3.3.2	Technical	In 3.3.2.4, does this mean that we must obtain certified QMS information for the suppliers of all materials to the Tier 1 suppliers considered in 3.3.1?	Clause 3.3.2.4 has now been removed.
78	3.3.2	Technical	Clarification required for what happens when the Tier 1 supplier is a primary industry with no Tier 2 (i.e., calcium carbonate suppliers extracting the raw material themselves).	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard.
79	3.3.2	Technical	Is there a risk in asking for information beyond Tier 1, where certain manufacturers who do not have Tier 2 suppliers are disadvantaged? Need to find a way around this?	Clause 3.3.2.4 has now been removed. The traceability requirements are explained in the standard.
80	3.3.2	Technical	Delete e.g., and insert i.e., and list the accepted standard(s) to be used. BS EN ISO 9001 is the accepted quality standard, and this should be specifically referenced. The term "(e.g., ISO based or otherwise) by a third-party certification body (or Conformity Assessment Body) accredited for that standard by an accreditation body that is a member of the IAF (International Accreditation Forum)." used throughout this section is inadequate and ambiguous. The term e.g., should be i.e., and specifically list the accepted standards. It is impossible to audit against an ambiguous statement and will allow unequal 'standards' to be used or claimed as equivalent to obtain the points. BS EN ISO 9001 is the accepted quality standard, and this should be specifically referenced.	Text and guidance document updated to reference ISO standards.
81	3.3.2	Technical	Remove reference to the undefined Tier 1 requirement 75% traceability to 'UKAS/IAF' as per previous Issue 3.1, section 3.3.1b. This would be acceptable, other than reference being made to the undefined Tier 1 requirement.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard.
82	3.3.2	Technical	Use the same term as used in 3.3.2.1 when referring to IAF certificated quality management system' The term 'certificated quality management system' has been introduced, rather than using the same terminology as per 3.3.2.1 referring to IAF. This will contribute to confusion and misinterpretation of the requirements.	Text and guidance document updated to reference ISO standards.
83	3.3.2	Technical	Remove reference to the undefined Tier 1 requirement 90% traceability to 'UKAS/IAF' as per previous Issue 3.1, section 3.3.1c. This would be acceptable, other than reference being made to the undefined Tier 1 requirement	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard.
84	3.3.2	Technical	Provide clarity of a what is a Tier 2 supplier 60% traceability to 'UKAS/IAF', but to Tier 2 supplier. Undefined of what is a Tier 2 requirement. See comments under 3.3.1.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.
85	3.3.2	Technical	Review this section to include how points are allocated Where suppliers meet the criteria for Tier 1 & Tier 2 (usually the case for aggregate suppliers), this section becomes difficult to justify. Under 3.3.2.3 3 points are awarded for 90% compliance, and then 4 points are awarded for 60% compliance under 3.3.2.4. It could also	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard.



			be the case that a company seeking certification can jump from 3.3.2.1 (compulsory) to 3.3.2.4 and be awarded 4 points, by-passing sections 3.3.2.2 & 3.3.2.3.	
86	3.3.2	General	3.3.2.4 - If there are no Tier 2 suppliers for the assessed product (e.g., for concrete, aggregate and cement are Tier 1 raw material producers). does the 3 score automatically apply?	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.
87	3.3.2	Technical	Some manufacturers may not have any Tier 2 suppliers at all, will they fail to achieve the 3 points in 3.3.2.4 in such case? Define Tier 2 suppliers The points in 3.3.2.4 should be automatically awarded to companies able to achieve the compulsory requirement in 3.3.2 but with no Tier 2 suppliers in their supply chain.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.
88	3.3.2	Technical	The requirement for “certification to a recognised standard” must be amended to permit a wider range of evidence of documented management systems in the supply chain. In the case of secondary materials this might include operation of a documented a management system to the satisfaction of a regulator (e.g., Environment Agency). Default award at level 3.3.2.1 might also be considered for secondary materials as for EMS in 3.3.3.1 without further verification. The requirements for “certification to a recognised standard” are grossly unfair to SME’s who are much less likely to have such certification. These criteria in the standard would seriously disadvantage SME’s and result in market distortion in favour of larger companies. As construction product manufacturers become more circular in their approach, more SMEs are being brought into the supply chain (example: our company turnover is > £250 million but we source over 25% of our raw materials from companies with fewer than 10 employees). We have already found our score and rating dropping in v3.1 of the standard for this reason. These criteria need to be broadened to avoid barriers to trade or perverse and unintended outcomes.	Requirement amended and guidance clarified.
89	3.3.2	Technical	3.3.2.4 - Either redefine this criterion or give default (deemed to satisfy) credit where there is no Tier 2 supplier (it could be changed to 60% of an organisation’s Tier 2 suppliers rather than 60% of materials) These Tier 2 credits may not be available to organisations with short supply chains (e.g. if the Tier 1 supplier is a quarry) or where secondary materials are concerned (e.g. if the Tier 1 supplier is a recycler collecting post-consumer materials).	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.
90	3.3.2	Technical	Establish the basis for a minimum of 60% of Tier 1 suppliers having a third-party certified QMS. Why is this not, say, 50%? Should there be a sliding scale depending on the size of the supplier and/or their risk assessment profile? For low-risk SMEs, for example, the formal QMS requirement can be lower, and allowance is made for “equivalent” evidence (as in v.3)? Please list all “recognised standards”. A third-party audited Factory Production Control system (as used for the purposes of CE/	Reference to ISO standards have been included. However, clarification regarding equivalent methods of obtaining credits/equivalent standards for SMEs have been outlined where necessary in the standard and guidance document.



			UKCA marking) with the assessed product(s) in scope should be included here. What is the basis for a minimum of 60% of Tier 1 suppliers having a QMS “certified to a recognised standard”? What if your suppliers are dominated by SMEs, say, without suitable third-party certified QMSs? Could this result in reputable SMEs being replaced unnecessarily in your supply chain? Allowance needs to be made for the size of the supplier and the fact that they could demonstrate their QMS by a different approach (e.g., Factory Production Control). SMEs need to be encouraged to address their QMS, not forced down a particular route, or possibly out of business.	
91	3.3.2	Technical	As above, establish the basis for the minimum of % of Tier 1 suppliers having a third-party certified QMS. Should there be a sliding scale depending on the size of the supplier and/or their risk assessment profile? As above, where does this leave SME suppliers? The size and risk profile of suppliers needs to be considered. Could an SME demonstrate that they are “working towards” relevant certification, for example?	Reference to ISO standards have been included. However, clarification regarding equivalent methods of obtaining credits/equivalent standards for SMEs have been outlined where necessary in the standard and guidance document.
92	3.3.2	Technical	Add a definition of tier1, tier 2 etc. Around 90% of our raw material comes from our own quarry. Are we therefore tier 0, and how does that score?	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.
93	3.3.2	Technical	3.3.2.4 - This is unattainable for us. Around 90% of our raw material comes from our own quarry. Are we being penalised for not buying through a chain (i.e., an unattainable 4th point)?	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.
94	3.3.2	General	Is it possible to have an Either / OR option, which supports the use of local SME’s when capturing constituent materials > 75%? i.e., Utilise the existing text and add an additional option which supports the on-going use of local SMEs In our industry we have frequently worked to source some of our smaller constituent materials from local suppliers. However, whilst this can be in the spirit of responsible sourcing, we can also be disadvantaged if these SMEs do not have international standards in place thus leading potentially to less points.	Reference to ISO standards have been included. However, clarification regarding equivalent methods of obtaining credits/equivalent standards for SMEs have been outlined where necessary in the standard and guidance document.
95	3.3.2	General	Is it possible to have an Either / OR option, which supports the use of local SME’s when traceable to Tier 2 suppliers? i.e., Continue to use the existing text with an additional option which supports the on-going use of local SMEs Again, on a similar theme of SME’s when taking this further to Tier 2 suppliers	Reference to ISO standards have been included. However, clarification regarding equivalent methods of obtaining credits/equivalent standards for SMEs have been outlined where necessary in the standard and guidance document.
96	3.3.2	Technical	Some companies may not have any Tier 2 suppliers. Will they be unable to achieve the maximum number of points? Inform whether companies with no Tier 2 suppliers will be unable to achieve the points.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.



97	3.3.2	Technical	There may be a need to list the group of “recognised standards” it would accept. There is concern that not all management systems are as robust as the ones certified to ISO standards. Restrict recognition to ISO or equivalent standards or offer further information (list) of acceptable standards in the main BES 6001 document (or Guidance).	Text and guidance document updated to include ISO standards. However, 'equivalent' schemes also included so if your suppliers have alternative schemes that were proven to be 'equivalent, this will be accepted.
98	3.3.2	Technical	Some manufacturers may not have any Tier 2 suppliers at all, will they fail to achieve the 3 points in 3.3.2.4 in such case? The points in 3.3.2.4 should be automatically awarded to companies able to achieve the compulsory requirement in 3.3.2 but with no Tier 2 suppliers in their supply chain.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.
99	3.3.2	Technical	If a Tier 1 supplier already have all certified management systems and BES 6001, wouldn't that mean that their main Tier 2 suppliers already have certified management systems? Consider simplifying 3.3.2.4 (and other similar clauses): If the Tier 1 suppliers already have their ISO management systems certified and have BES 6001 then this should be sufficient to ascertain that 60% of their own suppliers (Tier 2 for the certified company) have the necessary certified management system.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.
100	3.3.2	Technical	The “100%” requirement may be significantly difficult to achieve for companies with extensive supply chains, especially if such companies need to deal with many regional SMEs for their different sites' products' supply (especially if on a one-off basis)! Reconsider the 100% or reconsider how that requirement/ rule should be imposed,	Minimum traceability requirements have been amended and reduced from 100%.
101	3.3.2	Technical	Some manufacturers may not have any Tier 2 suppliers at all, will they fail to achieve the 3 points in 3.3.2.4 in such case? The points in 3.3.2.4 should be automatically awarded to companies able to achieve the compulsory requirement in 3.3.2 but with no Tier 2 suppliers in their supply chain	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.2.4 has now been removed.
102	3.3.3	Technical	Change to “60% of the constituent materials”	Minimum traceability requirements have been amended and reduced from 100%.
103	3.3.3	Technical	Clarification required for what happens when the Tier 1 supplier is a primary industry with no Tier 2 (i.e., calcium carbonate suppliers extracting the raw material themselves).	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.3.4 has now been removed.
104	3.3.3	Technical	Increasing the evidence of an EMS and H&S requirement for suppliers from 60% to 100% is an admirable target but very difficult for a compulsory requirement due to the reasons in the comments to the right. I therefore suggest 100% would award an additional credit and the limit for the compulsory requirement is more slowly phased in. Such as 80% compulsory requirement in version 4.0 of the BES 6001 and then 90% compulsory requirement in a subsequent revision of the BES 6001 standard. Increasing the evidence of an EMS and H&S requirement from 60% to 100% of suppliers will require a very significant workload to compile this evidence.	Minimum traceability requirements have been amended and reduced from 100%.



			<p>Smaller suppliers may also take some convincing to be this transparent as they are less used to providing such evidence. Also, suppliers where smaller quantities are purchased are less inclined the supplier is to want to assist the manufacturer in providing this evidence, as it will increase their workload for little preservable benefit to them. Making 100% very difficult to achieve for a compulsory requirement.</p> <p>Therefore, I suggest 100% would award an additional credit and then using a phased approach for the increase in compulsory requirement such as 80% rising to 90% in a later revision of the BES 6001 standard, to reduce the burden and challenges related to this.</p>	
105	3.3.3	Technical	<p>Is there a risk in asking for information beyond Tier 1, where certain manufacturers who do not have Tier 2 suppliers are disadvantaged? Need to find a way around this?</p>	<p>The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.3.4 has now been removed.</p>
106	3.3.3	Technical	<p>The requirement for the applicant company to hold IAF BS EN ISO 14001 certification to obtain the higher points is no longer present.</p> <p>The replacement section is inadequate (i.e., section 3.2.3, as it is too vague and ambiguous). The lack of clarity and the apparent reliance upon the supply chain only in terms of IAF BS EN ISO 14001 is a major step backwards.</p>	<p>An applicant will be awarded for maintaining ISO 14001 certification now in section 3.2.3.</p>
107	3.3.3	Technical	<p>100% traceable to Tier 1 companies operating a non-certified EMS</p> <p>This now states “100% of constituent material(s) in the assessed product(s) shall be traceable to Tier 1 supplier(s) with an environmental management system (EMS).” – Compulsory. This used to be 60% under Issue 3.1, section 3.3.2a.</p> <p>Dependent upon the Tier 1 definition, and if this can apply to both a seller and raw material provider at the same time, this could be a major issue.</p> <p>The onward requirement of 3.3.3.1 states “The EMS shall follow the fundamentals of ISO 14001 and shall include within its scope key processes of raw material extraction and primary material production, where appropriate to the scope of its operations.”</p> <p>This seems to suggest that a Tier 1 company is traceable to the raw material, which is again contradictory to 3.3.1.</p> <p>As explained under 3.3.1, this section is now compulsory, so if smaller supply companies do not respond to questioning regarding the existence of an environmental system and provide proof that it does exist (doesn't have to be IAF/UKAS), then the company seeking certification will have to stop purchasing from them or withdraw/lose their request for BES 6001 certification.</p> <p>Note – This happens quite a lot and currently their tonnage/% is not included, but as this is now compulsory, this would exclude a lot of companies from seeking BES 6001 certification.</p>	<p>Minimum traceability requirements have been amended and reduced from 100%.</p>



108	3.3.3	Technical	60% traceable to UKAS/IAF 60% traceability to 'UKAS/IAF' as per previous Issue 3.1, section 3.3.2b, but not now reliant upon the applicant company having 'UKAS/IAF' certification. This would be acceptable, other than our comments pertaining to section 3.2.3 and reference being made to the undefined Tier 1 requirement.	Traceability requirements amended to reference ISO standards.
109	3.3.3	Technical	Review section to include: • delete e.g., and insert i.e., • list the accepted standard(s) to be used. The term "(e.g. ISO based or otherwise) by a third-party certification body (or Conformity Assessment Body) accredited for that standard by an accreditation body that is a member of the IAF (International Accreditation Forum)." used to apply to this section and 3.3.3.3, 3.3.3.4 & 3.3.3.5 is inadequate and ambiguous.	Reference to ISO standards have been included.
110	3.3.3	Technical	BS EN ISO 14001 is the accepted quality standard, and this should be specifically referenced. The term e.g., should be i.e., and specifically list the accepted standards. It is impossible to audit against an ambiguous statement and will allow unequal 'standards' to be used or claimed as equivalent to obtain the points. BS EN ISO 14001 is the accepted environmental standard, and this should be specifically referenced.	Reference to ISO standards have been included.
112	3.3.3	Technical	Use the same term as used in 3.3.2.1 when referring to IAF certificated quality management system'. The term 'certificated quality management system' has been introduced, rather than using the same terminology as per 3.3.2.1 referring to IAF. This will contribute to confusion and misinterpretation of the requirements.	Criteria requirements aligned for clarity.
113	3.3.3	Technical	Review this section to include clarity of the definition of Tier 1 75% traceable to UKAS/IAF 75% traceability to 'UKAS/IAF' as per previous Issue 3.1, section 3.3.2c, but not now reliant upon the applicant company having 'UKAS/IAF' certification. This would be acceptable, other than our comments pertaining to section 3.2.3 and reference being made to the undefined Tier 1 requirement.	Please see point 108.
114	3.3.3	Technical	Review this section to include clarity of the definition of Tier 1 90% traceable to UKAS/IAF 90% traceability to 'UKAS/IAF' as per previous Issue 3.1, section 3.3.2d, but not now reliant upon the applicant company having 'UKAS/IAF' certification. This would be acceptable, other than our comments pertaining to section 3.2.3 and reference being made to the undefined Tier 1 requirement.	Please see point 108.
115	3.3.3	Technical	Review this section to include clarity of the definition of Tier 2 60% traceability to 'UKAS/IAF', but to Tier 2 supplier, and again not now reliant upon the	The reference to tiers has been removed. The traceability requirements are explained in the standard.



			applicant company having 'UKAS/IAF' certification. Undefined Tier 2 requirement. See comments under 3.3.1 & 3.3.2.4.	Clause 3.3.3.4 has now been removed.
116	3.3.3	Technical	Consider how such requirements apply to SMEs that follow already established stewardship schemes that are embedded into national standards (e.g., UKWAS for forestry in the UK) that deal with legal, environmental, management, people & communities and workers and sustainability issues in a sector specific manner for the supply of raw materials to larger industry. Forest owners and in particular small forest owners that supply downstream users of wood may have forest stewardship certification but may not be able to justify an EMS to ISO 14001 (or similar) in addition to the forest stewardship certification in terms of implementing, managing, and justifying the costs. The net result would be that larger manufacturers using that wood, would not be able to be certified to BES 6001. The nature of wood supply is that the same supplier is not always used and such a requirement for Tier 1 suppliers would restrict wood supply to bigger industry.	Consideration to SME's included and guidance clarified.
117	3.3.3	Technical	3.3.3.2 - Consider widening requirement to allow other accreditation bodies. Not all forest stewardship standards can be certified by a certification body that is accredited by an IAF body e.g., UKAS. Our understanding is that FSC cannot (uses ASI) but PEFC can. This would be unfair.	Guidance document confirms organisations certified to alternative sector specific environmental schemes (equivalent scheme) may be accepted where ISO 14001 certification has not been sought. The environmental schemes and their alignment with ISO 14001 will be reviewed on a case-by-case basis whereby the organisation under assessment must demonstrate to the auditor that the equivalent scheme meets the requirements as set out in ISO 14001.
118	3.3.3	General	3.3.3.5 - most constituent material does not have a Tier 2, do still get additional point?	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.3.5 has now been removed.
119	3.3.3	Technical	The "100%" requirement may be significantly difficult to achieve for companies with extensive supply chains, especially if such companies need to deal with many regional SMEs for their different sites' products' supply (especially if on a one-off basis)!	Minimum traceability requirements have been amended and reduced from 100%.
120	3.3.3	Technical	3.3.3.5 - Some manufacturers may not have any Tier 2 suppliers at all, will they fail to achieve the 3 points in 3.3.3.5 in such case? Define Tier 2 suppliers The points in 3.3.3.5 should be awarded automatically to companies able to achieve the compulsory requirement in 3.3.3 but with no Tier 2 suppliers in their supply chain.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.3.5 has now been removed.
121	3.3.3	Technical	Either redefine this criterion or give default (deemed to satisfy) credit where there is no Tier 2 supplier (it could be changed to 60% of an organisation's Tier 2 suppliers rather than 60% of materials) These Tier 2 credits may not be available to organisations with short supply chains	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.3.5 has now been removed.



			(eg if the Tier 1 supplier is a quarry) or where secondary materials are concerned (e.g. if the Tier 1 supplier is a recycler collecting post-consumer materials).	
122	3.3.3	Technical	Retain the “minimum of 60%” rule (from v.3), and/or develop a sliding scale depending on the size and risk profile of the supplier. Traceability of 100% of constituent materials to Tier 1 suppliers with an EMS is too high and could penalise the use of SMEs.	Minimum traceability requirements have been amended and reduced from 100%.
123	3.3.3	Technical	As above, establish the basis for the minimum of % of Tier 1 suppliers having a third-party certified EMS. Should there be a sliding scale depending on the size of the supplier and/or their risk assessment profile? As above, where does this leave SME suppliers? The size and risk profile of suppliers needs to be considered. It is right that where risks are identified, those suppliers are encouraged to put processes in place that follow ISO 14001 and that their response is audited.	Consideration to SME's included and guidance clarified
124	3.3.3	Technical	3.3.3.5 - This is unattainable for us. Around 90% of our raw material comes from our own quarry. Are we being penalised for not buying through a chain (i.e., an unattainable 4th point)?	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.3.5 has now been removed.
125	3.3.3	General	Is it possible to have an Either / OR option, which supports the use of local SME's when capturing constituent materials > 75%? i.e., Utilise the existing text and add an additional option which supports the on-going use of local SMEs In our industry we have frequently worked to source some of our smaller constituent materials from local suppliers. However, whilst this can be in the spirit of responsible sourcing, we can also be disadvantaged if these SMEs do not have international standards in place thus leading potentially to less points.	Please see point 94.
126	3.3.3	General	Is it possible to have an Either / OR option, which supports the use of local SME's when traceable to Tier 2 suppliers? i.e., Continue to use the existing text with an additional option which supports the on-going use of local SMEs Again, on a similar theme of SME's when taking this further to Tier 2 suppliers	Please see point 95.
127	3.3.3	Technical	Reconsider the 100% target. The 100% target might be unachievable for companies with extensive supply chains.	Minimum traceability requirements have been amended and reduced from 100%.
128	3.3.3	Technical	If companies do not have Tier 2 suppliers, will they be unable to achieve the points? Inform whether companies with no Tier 2 suppliers will be unable to achieve the points.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.3.5 has now been removed.
129	3.3.3	Technical	Some manufacturers may not have any Tier 2 suppliers at all, will they fail to achieve the 3 points in 3.3.3.5 in such case? The points in 3.3.3.5 should be awarded automatically to companies able to achieve the compulsory requirement in 3.3.3 but with no Tier 2 suppliers in their supply chain.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.4.5 has now been removed.



130	3.3.4	Technical	Is there a risk in asking for information beyond Tier 1, where certain manufacturers who do not have Tier 2 suppliers are disadvantaged? Need to find a way around this?	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.4.5 has now been removed.
131	3.3.4	Technical	Review this section on how higher-level points are awarded. The requirement for the applicant company to hold a recognised IAF BS ISO 45001 certification to obtain the higher points is no longer present. The replacement section is completely inadequate (i.e., section 3.2.3, as it is too vague and ambiguous). The lack of clarity and the apparent reliance upon the supply chain only in terms of IAF BS ISO 45001 is a major step backwards.	Reference to ISO standards have been included.
132	3.3.4	Technical	100% traceable to companies operating a non-certified H&S system that includes Near Miss, Time Loss & Fatal incidents. This now states "100% of constituent material(s) in the assessed product(s) shall be traceable to supplier(s) with a health and safety management system" – Compulsory. This used to be 60% under Issue 3.1, section 3.3.3a. No reference is made to Tiers, so this covers 100% of the supply chain (irrespective of the previously discussed Tier confusion). As explained under 3.3.1, this section is now compulsory, so if smaller supply companies do not respond to questioning regarding the existence of a H&S system and provide proof that it does exist (doesn't have to be IAF/UKAS), then the company seeking certification will have to stop purchasing from them or withdraw/lose their request for BES 6001 certification. As BES 6001 is examined retrospectively, it would become crucial/imperative that only supply companies that comply fully with the H&S requirements stipulated herein are used, otherwise BES 6001 certification will not be possible for any given year (e.g. 2020 is audited in 2021, so if a supply company (irrespective of their supply tonnage being 1 tonne or 1 million tonnes) used within 2020 cannot supply suitable H&S information, then the company seeking BES 6001 certification cannot obtain it). Note – This happens quite a lot, but at present, their tonnage/% is simply not included, but as this is now compulsory, this would exclude a lot of companies from seeking or obtaining BES 6001 certification.	Minimum traceability requirements have been amended and reduced from 100%.
133	3.3.4	Technical	Review section to include:• clarity of the definition of Tier 1• delete e.g., and insert i.e.,• list the accepted standard(s) to be used. 60% traceable to UKAS/IAFThe term "(e.g., ISO based or otherwise) by a third-party certification body (or Conformity Assessment Body) accredited for that standard by an accreditation body that is a member of the IAF (International Accreditation Forum)." used to apply to this section and 3.3.4.3, 3.3.4.4 & 3.3.4.5 is inadequate and ambiguous. The term	Reference to ISO standards have been included.



			e.g., should be i.e., and specifically list the accepted standards. It is impossible to audit against an ambiguous statement and will allow unequal 'standards' to be used or claimed as equivalent to obtain the points. BS ISO 45001 is the accepted H&S standard, and this should be specifically referenced. 60% traceability to 'UKAS/IAF' as per previous Issue 3.1, section 3.3.3b, but not now reliant upon the applicant company having 'UKAS/IAF' certification. This would be acceptable, other than our comments pertaining to section 3.2.3 and reference being made to the undefined Tier 1 requirement.	
134	3.3.4	Technical	Use the same term as used in 3.3.3.1 when referring to IAF certificated quality management system'. The term 'certificated quality management system' has been introduced, rather than using the same terminology as per 3.3.3.1 referring to IAF. This will contribute to confusion and misinterpretation of the requirements.	Traceability requirements amended to reference ISO standards.
135	3.3.4	Technical	Review this section to include clarity of the definition of Tier 1 75% traceable to UKAS/IAF 75% traceability to 'UKAS/IAF' as per previous Issue 3.1, section 3.3.3c, but not now reliant upon the applicant company having 'UKAS/IAF' certification. This would be acceptable, other than our comments pertaining to section 3.2.3 and reference being made to the undefined Tier 1 requirement.	Traceability requirements amended to reference ISO standards.
136	3.3.4	Technical	Review this section to include clarity of the definition of Tier 2 60% traceability to 'UKAS/IAF', but to Tier 2 supplier and again not now reliant upon the applicant company having 'UKAS/IAF' certification. Undefined Tier 2 requirement. See comments under 3.3.1 & 3.3.2.4.	Clause referencing Tier 2 removed.
137	3.3.4	General	3.3.4.1 - Same as 3.3.3.1 but for H&S, not feasible to expect 100%. 90% is a sensible figure to use.	Minimum traceability requirements have been amended and reduced from 100%.
138	3.3.4	Technical	The "100%" requirement may be significantly difficult to achieve for companies with extensive supply chains, especially if such companies need to deal with many regional SMEs for their different sites' products' supply (especially if on a one-off basis)!	Minimum traceability requirements have been amended and reduced from 100%.
139	3.3.4	Technical	3.3.4.5 - Some manufacturers may not have any Tier 2 suppliers at all, will they fail to achieve the 3 points in 3.3.4.5 in such case? Define tier 2 suppliers. The points in 3.3.3.5 should be awarded automatically to companies able to achieve the compulsory requirement in 3.3.4 but with no Tier 2 suppliers in their supply chain.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.4.5 has now been removed.
140	3.3.4	Technical	Either redefine this criterion or give default (deemed to satisfy) credit where there is no Tier 2 supplier (it could be changed to 60% of an organisation's Tier 2 suppliers rather than 60% of materials) These Tier 2 credits may not be available to organisations with short supply chains (e.g., if the Tier 1 supplier is a quarry) or where secondary materials are concerned (e.g. if the Tier 1 supplier is a recycler collecting post-consumer materials).	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.4.4 has now been removed.
141	3.3.4	Technical	As above, introduce SME-friendly options for the health and safety management processes. Should there be a sliding scale for the constituent materials depending on the size of the	SME equivalence included in guidance document.



			supplier and/or their risk assessment profile? A blanket approach regardless of supplier size/ risk profile could be discriminatory, particularly for SMEs.	
142	3.3.4	Technical	Please list all relevant H&S management system standards. Who decides on what is a “recognised standard”?	Reference to ISO standards have been included.
143	3.3.4	Technical	3.3.4.5 - This is unattainable for us. Around 90% of our raw material comes from our own quarry. Are we being penalised for not buying through a chain (i.e., an unattainable 4th point)?	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.4.5 has now been removed.
144	3.3.4	General	Is it possible to have an Either / OR option, which supports the use of local SME’s when capturing constituent materials > 75%? i.e., Utilise the existing text and add an additional option which supports the on-going use of local SMEs In our industry we have frequently worked to source some of our smaller constituent materials from local suppliers. However, whilst this can be in the spirit of responsible sourcing, we can also be disadvantaged if these SMEs do not have international standards in place thus leading potentially to less points.	Please see point 94.
145	3.3.4	General	Is it possible to have an Either / OR option, which supports the use of local SME’s when traceable to Tier 2 suppliers? i.e., Continue to use the existing text with an additional option which supports the on-going use of local SMEs Again, on a similar theme of SME’s when taking this further to Tier 2 suppliers	Please see point 95.
146	3.3.4	Technical	Reconsider the 100% target. The 100% is likely to be impossible. The % requirements may also be better applied based on company size.	Minimum traceability requirements have been amended and reduced from 100%.
147	3.3.4	Technical	The “100%” requirement may be significantly difficult to achieve for companies with extensive supply chains, especially if such companies need to deal with many regional SMEs for their different sites’ products’ supply (especially if on a one-off basis)! Reconsider the 100% or how that requirement/ rule is imposed.	Minimum traceability requirements have been amended and reduced from 100%.
148	3.3.4	Technical	Some manufacturers may not have any Tier 2 suppliers at all, will they fail to achieve the 3 points in 3.3.4.5 in such case? The points in 3.3.4.5 should be awarded automatically to companies able to achieve the compulsory requirement in 3.3.4 but with no Tier 2 suppliers in their supply chain.	The reference to Tier 1 & Tier 2 has been removed. The traceability requirements are explained in the standard. Clause 3.3.4.5 has now been removed.
149	3.4.1	Technical	‘External verification’ should not be undertaken by the assessing organisation (CB). Definition to be described in detail.	This has now been included.
150	3.4.1	Technical	For scores of 3 and 4 require targets to be linked to thresholds, i.e., 1.5o Paris aligned targets. For GHG targets to be meaningful, they need to be Paris aligned/linked to the science. Currently verified, public targets can receive the highest points even when they are completely inadequate, e.g., target to reduce GHG’s by 1% by 2025. Higher points scores should reward and incentivise science-based target setting.	Targets are now required to be in line with Net Zero.



151	3.4.1	Technical	Consideration should be given to using Greenhouse gas protocol terminology i.e., Scope 1, 2 and 3. To encourage the full understanding and reporting of the most material GHG sources, e.g., the biggest impact may be scope 3.	The terminology used is in line with ISO 14064: 'direct' and 'indirect'. However, it has been clarified what is included in these.
152	3.4.1	Technical	Use the principle of materiality to inform target setting, i.e., require targets to be set for the most material emission sources. Different firms have different emissions profiles and therefore important that firms focus on their key emission sources	As targets need to be in line with Net Zero, organisations need to identify their largest sources of emissions and target these areas to make a significant reduction. Therefore, an organisation's most substantial emissions sources would be identified as part of this.
153	3.4.1	Technical	Clarification required on 'indirect greenhouse gas emissions' scope. Is the requirement Scope 2 indirect (purchased electricity, steam, heating and/or cooling for own use) or Scope 2 and Scope 3 Indirect (purchased goods, transport, business travel, employee commuting, leased assets, etc). Definitions of above required in section 2 too and if Scope 3 Indirect GHG emissions are required then guidance on establishing appropriate boundaries on what Scope 3 emissions should be included would be appreciated.	It has now been clarified what emissions are required for the compulsory credit. This remains unchanged from the previous version of BES 6001. There are now optional credits available for those who also monitor their remaining indirect (i.e., scope 3) emissions.
154	3.4.1	Technical	Greenhouse gas emissions – Need to clarify between scope 1, 2 and 3 emissions. Also need to look at Net-Zero. Current greenhouse gas reporting requirements generally work to the scope 1, 2, 3 model and the information will be held in this format. Also ties in with point 1 above.	Emission requirements have been clarified and Net-Zero aligned targets are included.
155	3.4.1	Technical	The term "The organisation shall establish a policy, supported by a documented management system" has more significance than before because of the link to section 3.2.3. Please see our specific comments pertaining to this.	3.2.3 (now 4.2.3) updated and clarified to reflect requirements for accredited management systems.
156	3.4.1	Technical	Global Warming is a key sustainability issue and may need to be awarded more points, at least as much as biodiversity (at 10 points) for example. Reconsider awarding more points to GHG emissions.	GHG section is worth more points. (Please note, the points are not amassed at this stage and so it would have only been 4 credits available for biodiversity).
157	3.4.1	Technical	It may be better to avoid direct reference to quantification in accordance with the principles of ISO 14064-1 as many of the Scope 3 emissions are significantly difficult to quantify. It may be better to limit the indirect GHG emissions reporting to Downstream logistics, commuting, waste, business travel and upstream logistics (see PPN 06/21). PPN 06 / 21 is UK legislation not applicable to non-UK certificate holders	It has now been clarified what emissions are required for the compulsory credit. This remains unchanged from the previous version of BES 6001. There are now optional credits available for those who also monitor their remaining indirect (i.e., scope 3) emissions.
158	3.4.1	Technical	The standard should refer to "indirect scope 2" emissions in all criteria if that is the intention. It is not clear which GHG scopes are included within "indirect GHG emissions". Scope 3 cannot be included at the compulsory level.	It has now been clarified what emissions are required for the compulsory credit. This remains unchanged from the previous version of BES 6001.



159	3.4.1	Technical	Please reinstate the two bullet points from v.3 of the standard concerning direct and indirect emissions. Is the intention to bring Scope 3 emissions into scope here? If so, this is too far to go at this stage for the compulsory level. The new bullet points are not clear.	It has now been clarified what emissions are required for the compulsory credit. this remains unchanged from the previous version of BES 6001.
160	3.4.1	Technical	Consider change in points distribution. Compared to biodiversity, GHG emissions criteria has fewer available points when it is arguably a more pertinent issue.	GHG section is worth more points. (Please note, the points are not amassed at this stage and so it would have only been 4 credits available for biodiversity).
161	3.4.1	Technical	It may be better to avoid direct reference to quantification in accordance with the principles of ISO 14064-1 as many of the Scope 3 emissions are significantly difficult to quantify. It may be better to limit the indirect GHG emissions reporting to categories familiar to the industry, such as those identified in Government contracts exceeding £5M (see PPN 06/21) or those recognised under Science Based Targets criteria. Another option is to include a “materiality” assessment process so only the most relevant Scope 3 elements are included.	It has now been clarified what emissions are required for the compulsory credit. this remains unchanged from the previous version of BES 6001. There are now optional credits available for those who also monitor their remaining indirect (i.e., scope 3) emissions.
162	3.4.2	Technical	Replace “certified to ISO 50001” with “following ISO 50001 principles”. Certification is voluntary in Romania. It seems that in UK is compulsory.	ISO 50001 is not compulsory in the UK and is also not compulsory for this credit. However, it is included as a example of compliance with the compulsory credit.
163	3.4.2	Technical	What does ESOS mean? Can ESOS be replaced with an external energy audit? Providing meanings for non-UK countries would increase BES 6001 applicability.	ESOS is an energy assessment scheme. The guidance document confirms an equivalent energy audit obligation is also accepted as for the compulsory credit.
164	3.4.2	Technical	The term “The organisation shall establish a policy, supported by a documented management system” has more significance than before because of the link to section 3.2.3. Please see our specific comments pertaining to this.	3.2.3 (now 4.2.3) updated and clarified to reflect requirements for accredited management systems.
165	3.4.2	Technical	In mature systems it may be difficult to further reduce energy usage relative to output over time. Companies should not be penalised for already having a mature robust system. Maintaining low energy use should be awarded significant credit points – certainly more compared to a company that has improved from terrible to very bad.	Standard/Guidance Document has been amended to ensure those who have reached and maintained their minimal feasible energy usage, are not penalised.
166	3.4.2	Technical	Remove reference to ESOS in this section Note ESOS is a UK requirement and will not be relevant to non-UK certificate holders.	Mention of ESOS is no longer in the standard but only in the guidance document as an example of compliance. The guidance document also confirms evidence of an equivalent energy audit obligation is accepted.
167	3.4.2	Technical	Please amend this description (para 2) to: “Energy management system(s) certified to ISO 50001 [by a third-party...] or complying with the principles of ISO 50001; or compliance to ESOS or equivalent audit obligation meets this requirement”. Please include ‘ESOS’ in the Glossary. Having the policy and relevant principles incorporated into the QMS should be sufficient for these criteria. Full certification to ISO 50001 should not be compulsory.	ISO 50001 is not compulsory for this credit however it is included as an example of compliance with the compulsory credit. ESOS is now longer mentioned in the standard but only the guidance document as an example of compliance also



168	3.4.2	Technical	There is too much focus on energy targets in this section. Please note that some sectors already have significantly low energy consumption levels due to the nature of their products or due to significant progress in the last 10-15 years, in such case having an energy target may no longer be the main objective (especially if it was clashing with other aspects such as carbon). As noted for 3.4, there is a need for a materiality assessment where only the “material” impact categories for the certified company are considered. If energy targets are not “material” for the assessed company, then it could be excluded from the assessment and replaced by another more “material” target.	Standard/Guidance Document has been amended to ensure those who have reached and maintained their minimal feasible energy usage, are not penalised.
169	3.4.2	Technical	As all large companies (e.g., £38m turnover, ≥250 employees) need to comply with ESOS anyway, this section can be reworded and made easier for companies to understand. Maybe reword by including ISO 50001 or equivalent audit requirement for SME's with under £38m turnover and <250 employees and proof of ESOS compliance for larger companies.	Mention of ISO 50001 or ESOS is no longer in the standard but are in the guidance document as examples of compliance. The guidance document also confirms evidence of an equivalent energy audit obligation is accepted.
170	3.4.2	Technical	Factor in source of energy use (renewable vs fossil) where all practical process optimisation has been done. The current approach in this section only rewards companies that can reduce energy intensity and therefore penalises companies that have reduced their energy use as far as practically possible prior to certification. A more proportionate approach would consider the source of the energy and to recognise the use of renewables to cover residual energy use.	This subject has now been included in section 3.4.2 as an additional credit. The Standard/Guidance Document has been amended to ensure those who have reached and maintained their minimal feasible energy usage are not penalised.
171	3.4.2	Technical	It is not clear if reference to ESOS in this section	ISO 50001 or ESOS are included in the guidance document as examples of compliance. The guidance document also confirms evidence of an equivalent energy audit obligation is accepted.
172	3.4.3	Technical	What does “The assessed product(s) have independent certification against established product circularity standards” mean? What product circularity standard are considered?	This credit has been removed.
173	3.4.3	Technical	Reconsider applicability of “Actions to extend the lifespan of the assessed product(s)”. Cement for example is further embedded into other products (concrete, dry mortars, adhesives, etc). It cannot be used as such. Avoiding product default underscore because of not applicable criterion.	Guidance document provides direction for when criteria are not applicable.
174	3.4.3	Technical	The term “The organisation shall establish a policy, supported by a documented management system” has more significance than before because of the link to section 3.2.3. Please see our specific comments pertaining to this.	3.2.3 (now 4.2.3) updated and clarified to reflect requirements for accredited management systems.
175	3.4.3	Technical	Include an additional section 3.4.3.4. Create an extra sub-section 3.4.3.4 ‘External verification’ should be included herein. This would seem logical, but also key in verifying recycled contents of products.	This has not been included. If an organisation does not monitor their recycled contents of products, there is no information to verify.
176	3.4.3	Technical	The exacting standards should be listed within both 3.4.3.1 & 3.4.3.2 for auditing purposes Linked to 3.4.2.1, this section refers to ‘The assessed product(s) have independent	This credit has been removed.



			<p>certification against established product circularity standards', without listing or detailing these standards. This is ambiguous.</p> <p>The exacting standards should be listed within both 3.4.3.1 & 3.4.3.2 if uniformity of auditing is to be achieved and correct and full guidance provided for the applicant company.</p>	
177	3.4.3	Technical	<p>The statement 'Declaration of recycled content in accordance with ISO 14021 or recognised sector standard of the assessed product(s)' should be amended to simply stated "declaration of recycled content"</p> <p>This is factual and does not require reference to a further standard, which is seemingly optional anyway via the second part of the sentence.</p>	The wording has been amended to exclude the reference to ISO 14021 in the standard.
178	3.4.3	Technical / Editorial	<p>Change new wording to read "and assess products regards their circularity. In the compulsory section it is too soon to have requirements to develop products for the circular economy as the 'base' requirement, the first step should be to understand the products' place in the circular economy because the product(s) may well already fit well in the circular economy and therefore no development is needed. If this investigation finds that more work needs to be done then products can be developed that fit into the circular economy or the best solution for that product can be found, as in 3.4.3.2.</p>	The compulsory credit wording has been amended.
179	3.4.3	Technical	<p>Remove the bullet point "declaration of recycled content".</p> <p>Add the bullet point: "Active participation in closed loop recycling schemes relevant to the assessed product(s)".</p> <p>Amend the criterion title to "Resource use at end of life & Product circularity". This criterion is rightly focused on resource use at end of life and product circularity. However, the amount of recycled content in the product does not relate to the circular economy. It is the end-of-life recycling rate that is important.</p> <p>We would also like members of our CAB Closed Loop Recycling Scheme to be suitably recognised.</p>	<p>Recycling schemes are included in the guidance document as examples to demonstrate actions taken to improve future resource use at end-of-life of the assessed product.</p> <p>However, the title of 3.4.3 will remain unchanged as this section focuses on material use prior to end-of-life also.</p>
180	3.4.3	Technical	<p>Check if these attainable for all building products? As a brick manufacturer, we already have a product that lasts hundreds of years and then is reusable or recyclable, so how can we demonstrate improvement on that? How are you going to measure it?</p>	<p>Guidance document provides direction for when criteria are not applicable. However, if a product is reusable or recyclable, actions to improve future resource use at end of life are established.</p>
181	3.4.4	Technical	<p>Include reference to 'IAF' BS EN ISO 14001 certification The term "The organisation shall establish a policy, supported by a documented management system" has more significance than before because of the link to section 3.2.3. Please see our specific comments pertaining to this.</p> <p>The second element of this sub-section (extract below) should include reference to 'IAF' BS EN ISO 14001 certification, in that this level of certification should automatically satisfy the</p>	<p>The guidance document has been amended to confirm 14001 certification meets the 2nd aspect of the compulsory credit.</p>



			<p>requirement without any additional evidence having to be provided or sought from the applicant company, otherwise the BES 6001 audit will stray into BS EN ISO 14001 audit territory, which should not happen.</p> <p>“AND The organisation shall provide evidence that all controlled waste arising from its operations is stored, transported and treated such that risks to human health and the environment are minimised and that all local regulatory requirements are fulfilled”</p>	
182	3.4.5	Technical	<p>There does not seem to be any filtering of the impacts, using the principle of materiality and some organisations may not have significant water impacts. How do they comply and score more highly in performance ratings if they do not have targets etc as it is not a significant impact?</p>	<p>The credits in this section are no longer sequential and therefore the verification credit can be achieved without having targets set. Standard/Guidance Document has been amended to ensure those who have reached and maintained their minimal feasible water usage, are not penalised</p>
183	3.4.5	Technical	<p>Water use is reported in EPD (FW = Net use of fresh water). Consideration to recognise third-party verified EPD / FW</p>	<p>This is confirmed in the guidance document.</p>
184	3.4.5	Editorial	<p>Clearly define “regularly”. Annually? Once at every 3 years?</p>	<p>‘Regularly reviewed’ is defined in the guidance document.</p>
185	3.4.5	Technical	<p>Reconsider the number of points available. There are more points available here than for waste and resource efficiency.</p>	<p>Credits available are in line with Waste & Resource Use.</p>
186	3.4.6	Technical	<p>Recommendation: ...available on the EPD scheme operator’s website and organisation’s website’</p>	<p>Criteria has been updated.</p>
187	3.4.6	Technical	<p>Clarity to be sought that the participation in a generic EPD still applies in terms of awarded points. The scoring system is also not clear. Issue 3.1 included the following, which should be re-introduced to clarify matters. “Part c is not cumulative to part b and can be scored on the basis of meeting part a)”, but now referring to 3.4.6.2 & 3.4.6.3.</p>	<p>Text omitted in initial draft in error. Section has been updated to include the appropriate text.</p>
188	3.4.6	Technical	<p>Delete the words “for the assessed products” so as to retain the flexibility allowed in v3.1 The amendment has introduced the additional wording “for the assessed products” but it might not be appropriate to publish as EPD for all products within scope. This would be wasteful in terms of cost and management resource.</p>	<p>Whilst not explicit in v3.1/3.2 intent of the criteria is for all products in scope of assessment to be covered. Guidance document available on GreenBookLive states, “To achieve the highest performance rating of 3 points, the organisation must have satisfied the compulsory requirements and have independently verified Environmental Product Declaration (EPD) for the product(s) undergoing assessment ...”</p>
189	3.4.6	Technical	<p>The EPD are valid and publicly available on the EPD scheme operator’s website.</p>	<p>Criteria has been updated.</p>
190	3.4.7	Technical	<p>What does a Health Product Declaration mean? Is it something different than SDS (Safety Data Sheet) – imposed by EU REACH Regulation?</p>	<p>Credit to be removed due to lack of harmonised approach to HPDs and push back.</p>



191	3.4.7	Technical	I suggest published Health Product Declarations get 1 additional credit and independently verified HPD's get 2 additional credits. Add allowance for non-independently verified HPD's (due to cost of verification).	Credit to be removed due to lack of harmonised approach to HPDs and push back.
192	3.4.7	Technical	To score additional points companies are required to independently verified Health Product Declaration(s) for the assessed product(s). However, the standard does not specify how this must be done or what information must be recorded to make such a statement. The standard (as written) is therefore not sufficiently explanatory and will lead to confusion and a non-standard auditing approach.	Credit to be removed due to lack of harmonised approach to HPDs and push back.
193	3.4.7	Technical	Our product is not subject to REACH as it is an 'Article'. It is not toxic. Does this mean we automatically get maximum credit points – it is not clear? Should not be rewarding systems that have improved their toxicity over those that had none in the first place.	HPD credit removed. Only compulsory credit for hazards assessment of chemicals used in making of the assessed product. Guidance confirms if no chemicals present in or used in the manufacturing of the assessed product(s), the compulsory criteria is achieved.
194	3.4.7	Technical	In its current format, this section will likely award products with higher level of hazard risk. Low risk products not identified as risk under REACH, and products which do not need to generate Health Product Declarations (HPD), will be penalized by not being able to achieve these points. Should start with COSHH assessments as compulsory. Consider a materiality-based approach as described above, or allow products which are not relevant to achieve these points automatically based on their COSHH assessment, etc.	HPD credit to be removed due to lack of harmonised approach. Guidance Document confirms COSHH assessments are accepted.
195	3.4.7	Technical	Reconsider how these points can be achieved given low risk products will currently be penalised by not being able to achieve the points that higher risk products can. In its current format, this section will award products with higher levels of hazard risk. Low risk products won't be able to achieve the points.	Criteria can be achieved if it can be proven that no chemicals are used in the product or in its manufacturing process.
196	3.4.8	Technical	It is not clear whether the requested targets refer to the companies' own transport or include constituent material transport. This requires clarification.	This has been clarified in the Guidance Document.
197	3.4.8	Technical	Need to give examples of significant impacts to be included. Provide examples in guidance documents available to all	This has been included in the Guidance Document.
198	3.4.8	Technical	3.4.8.2 - This criterion should perhaps be moved toward the top end of the clause. Much of this assessment would be out of our control.	This has been actioned.
199	3.4.8	Technical	There is a need to clarify appropriate significant and direct environmental & social impacts. If reference is made to direct emissions, noise, and nuisance then this will need to be clearly stated in the Guide. Also specify to whom it would and would not apply (hauliers, company cars, etc).	This has been included in the Guidance Document.



200	3.4.9	Technical	Provide clarity that if a business holds BS EN ISO 14001 (UKAS/IAF), this should automatically meet this requirement. This section requires regular biodiversity assessments but does not stipulate the assessment process or requirements. This would usually refer to the specific plans granted at time of planning, so should not cause an issue. The auditing process for BES 6001 may stray into BS EN ISO 14001 requirements. Where companies already hold BS EN ISO 14001 (UKAS/IAF), this should automatically meet this requirement and BES 6001, section 3.4.9 should clearly state this.	Criteria has been amended. As this is not a direct requirement of ISO 14001, a valid action plan will be required.
201	3.4.9	Technical	Clarify what 'regularly is' and if website disclosure is still sufficient.	'Regularly reviewed' is defined in the guidance document.
202	3.4.9	Technical	Change the number of credits awarded. There are more credits available here than for the reduction of greenhouse section. Companies on industrial sites are at a disadvantage with respect to gaining more credits. A caveat should be in place that states if nothing can be done to improve the site then the company should not be penalised. This section needs a re-write.	Number of credits has been reduced.
203	3.4.9	General	How can Biodiversity have more points available than any other Section 3 clause?	Number of credits has been reduced.
204	3.4.9	Technical	Reconsider the number of points awarded for this category. Industries with biodiversity issues are likely to score significantly more than sectors with no biodiversity impact! Reconsider the points distribution for this section and other sections within 3.4. Consider introduction of a materiality assessment so companies are only assessed against the most relevant sections within 3.4. See 3.4.13 comment, sites on Industrial estates have little opportunity for meaningful biodiversity action.	Number of credits has been reduced.
205	3.4.9	Technical	Not clear what is meant by "regular" in this section, is it annual or every few years? Need clarification.	'Regularly reviewed' is defined in the guidance document.
206	3.4.9	Technical	3.4.9.4 - Externally verified evidence of environmental stewardship is very hard to demonstrate – only one known scheme? This needs to be done at a Company level to demonstrate there is a commitment to biodiversity improvements, but it may not be demonstrable at every site.	This credit has been removed.
207	3.4.9	Technical	Define the scope of the requirements needed in the policy and supporting arrangements in 3.4.9.1. It is not at all clear if the requirements apply to the organisation and/or its supply chain, except in 3.4.9.4 where the text "at source" has been inserted. The scope of the biodiversity requirements in terms of the activities (organisation and/or its supply chain) should be made clearer as is the case in other sections (e.g., 3.4.10)	The scope has been clarified in the guidance document.
208	3.4.9	General	Review the allocation and distribution of credits to Biodiversity management to ensure fairer access for certified organisations. In general, there appear to be (too) many credits made available for biodiversity management. Whilst this is an important topic, it might not be material to many organisations at their sites or within their supply chain. These companies will therefore not be able to access these credits which would not be equitable.	Number of credits has been reduced.



209	3.4.9	Technical	Reconsider the number of points awarded for this category. Industries with biodiversity issues are likely to score significantly more than sectors with no biodiversity impact! Reconsider the points distribution for this section and other sections within 3.4. Consider introduction of a materiality assessment so companies are only assessed against the most relevant sections within 3.4.	Number of credits has been reduced.
210	3.4.10	Technical	I suggest an additional credit is made available for externally verified Human Rights activities, such as SA 8000 certification. Add additional credit for independently verified Human Rights activities such as SA 8000 certification.	The guidance document confirms organisations certified to SA 8000 achieve the compulsory credit.
211	3.4.10	Technical	The following sentence should be removed as it is a repeat of 3.4.10.1: “The organisation has a human rights action plan or due diligence strategy”. This section should simply refer to stakeholder reporting. Also, clarify what ‘regularly is’ and if website disclosure is still sufficient.	The duplication has been removed. ‘Regularly reviewed’ is defined in the guidance document. Reporting requirements included in standard.
212	3.4.10	Technical	It is not clear if this section applies to members of the supply chain only when they are on our premises. Is it practicable to extend this to members of the supply chain on their premises considering the amount of time and effort this would take for a company with multiple suppliers?	Clarified which sections cover organisation/supply chain. Requirements related to supply chain no longer compulsory.
213	3.4.10	Technical	3.4.10.1 - Please clarify how far along the supply chain organisations are expected to be able to demonstrate this. For example, does this include all suppliers and equally other stakeholders such as banks, customers, etc.?	Clarification provided in guidance document.
214	3.4.10	Technical	There is a need for more information in the Guidance on how to achieve this requirement. Maybe explicitly note that a policy disclosure on the company website will be sufficient for the compulsory point. The guidance can also explain if certifications such as BES 6002 are sufficient. The due diligence requirement will also need some explaining whether it is restricted to the company’s premises and own operations or would extend to suppliers’ premises even if not related to the supplied products.	Clarified in guidance document.
215	3.4.11	Technical	Text states ‘goes beyond the requirements of the Modern Slavery Act’ – Clarify what ‘goes beyond’ means Very difficult to audit, lack of clarity.	Criteria has been amended and explained further in the guidance document.
216	3.4.11	Technical	Reconsider applicability of “modern Slavery and Human Trafficking statement” or add “where legally required”. No Modern Slavery Act in Romania. Providing meanings for non-UK countries would increase BES 6001 applicability. Avoiding product default underscore because of not applicable criterion.	Reference to the Modern Slavery Act has been removed.
217	3.4.11	Technical	Incorrect spelling of Business in 3.4.11 Heading No sub-section or clause numbers shown	This has been amended.
218	3.4.11	Technical	This section states “which goes beyond the requirements of the Modern Slavery Act and demonstrates continual improvement”.	Criteria has been amended and explained further in the guidance document.



			Continual improvement may not be possible if all the legal requirements have been met. This is impossible to audit and control and is subjective in nature. Too vague. Remove or amend wording.	
219	3.4.11	Technical	Certification is mentioned, but not to any standard and whether this is 'IAF' or non-accredited certification. External verification is also acceptable, so renders certification pointless. Continuous is used here rather than continual. Please also see comments under 3.4.11.2 regarding this requirement.	Verification credit removed.
220	3.4.11	Technical	Some countries may have requirements different to those in the Modern Slavery Act. The Modern Slavery Act is UK legislation, not applicable elsewhere	Reference to the UK Legislation has been removed.
221	3.4.11	Technical	BES 6002: another scheme, there are too many standards. It should be BES 6002 OR can demonstrate a commitment to continuous improvement You are penalising companies which are improving their ethics but do not have BES 6002	Verification credit has been removed.
222	3.4.11	General	3.4.11.1 - Replace "and" with "or". 'And... and ...and' is very demanding for a compulsory criterium.	This criterion remains unchanged.
223	3.4.11	Technical	Refer to a different standard. Due to the international scope of the standard, some countries may have different requirements to those specified in the Modern Slavery Act.	Reference to the Modern Slavery Act has been removed.
224	3.4.11	Technical	Some countries may have requirements different to those in the Modern Slavery Act. Refer to an alternative/ equivalent standard to the Modern Slavery Act. The Guide can also explain if certifications to schemes such as BES 6002 can be sufficient in fulfilling all ethical labour requirements.	Reference to the Modern Slavery Act has been removed. Verification credit also removed.
225	3.4.12	Technical	Legal requirements are stated, but no reference to the actual legislation is made. This should be clarified to be specific rather than ambiguous.	Reference to legal requirements removed.
226	3.4.12	Technical	The either/or criteria is not equal or equivalent as one has no bearing on the other. Reduce to one requirement and be specific.	Either/or criteria has been removed.
227	3.4.12	Technical	It is not clear that to achieve a higher credit point rating the lower credit point ratings also must be achieved. As it reads, you can achieve 2 points whilst not having set any targets (the 1-point category).	Scoring has been explained in the standard and guidance document.
228	3.4.12	Technical	Is it possible to achieve 3.4.12.3 and 3.4.12.4 without having targets for employees learning and development? The structure in this section is not clear as it does not seem that achieving 3.4.12.3 and 3.4.12.4 is dependent on 3.4.12.2.	Scoring has been explained in the standard and guidance document.
229	3.4.13	Editorial	Who decides what is and what is not "appropriate and practical"?	This has been clarified in the guidance document.
230	3.4.13	Technical	Include EN ISO 14001 as, meeting this requirement. Reference to automatic compliance when the company is 'IAF' certified to BS EN ISO 14001 as this standard covers all these requirements.	As ISO 14001 does not necessarily cover the requirements in all cases, this has not been included.



231	3.4.13	Technical	The either/or criteria is not equal or equivalent as one has no bearing on the other. Reduce to one requirement and be specific. The required KPI's under Resource Section 3.4.3 of BES 6001 already cater for this.	Either/or criteria has been removed.
232	3.4.13	Technical	A definition of 'local' is required e.g., is it within a certain specified distance of a manufacturing site?	This has been clarified in the guidance document.
233	3.4.13	Technical	It should be noted that many RMX, asphalt and Concrete Product are based on industrial parks where no neighbouring communities exist apart from other businesses, etc. There is no local community to engage with! How would these companies perform on this section? Need a definition for "local community". The point award system will need to ensure that manufacturers with no neighbouring communities can still have a fair chance to achieve these points. Need to define what are local suppliers 10 miles – 500 miles?	This has been clarified in the guidance document.
234	3.4.13	General	3.4.13.1 - Replace "and" with "or". 'And...and...and' is very demanding for a compulsory criterium.	This criterion remains unchanged.



19 May 2022 to 19 June 2022 Consultation Period				
	Section	Type	Proposed change	BRE Response
Type of comment: G = general T = technical Ed = editorial				
1	General	E	Check reference to the cradle to cradle - It should be 'cradle to cradle certified ®'	This amendment has been done
2	General	T	Section 4.3 - How would you address reused materials or components?	Recycled and recovered material requirements are stated in the standard and guidance.
3	General	E	Several clauses include this statement "The following criteria are not cumulative and can be scored on the basis of meeting...". Although most members understood what was meant by this statement, it was felt that it may still be confusing. Improve wording	The wording in the standard has been amended for clarification.
4	General	G	Members felt that many points would require external verification. It was felt that this could be excessive and costly for some of the smaller suppliers. The additional available points are also harder to score as a lot of the section require external verification. This can have a negative effect in the way of costing implications and extra resource which smaller companies do not have available.	Most external verification criteria were present in the previous version. Almost all sections in the new version are not consecutive, i.e., external verification is not needed to achieve the other credits in the section.
5	General	G	Timeframe for transition needs to be reviewed. With two big shifts on the scoring framework - (Grading boundaries scoring & how you score) companies need time to understand and modify current procedures in place. It would be beneficial to all to only change one of the two framework changes then look two review further in the future.	There will be a transition period to ensure organisations have time to review compliance.
6	General	G	Clarity required on materials and data to be recorded based on point of distribution- Example what is the point in which data (Km) is recorded when PFA/ GGBS is sent to our sites.	Guidance document updated for clarification.
7	General	G	How will the new scoring system work with the BREEAM rating for the building?	Please see v4 FAQs on GreenBookLive to clarify.
8	General	G	Some members believe that achieving points under the new structure will become significantly more difficult. One of our members carried out an assessment for the grading boundaries in the new standard. The boundaries seem to have been raised, leading some companies' "Excellent" grades to drop down to "Good"! Consider lowering grading boundaries by a few points to help with companies' transition. Comparing the standard to similar schemes that seem to score similar RSCS scores in BREEAM (such as CSC) may help make the grading structure fairer for companies certified to BES 6001. The BES 6001 rating status is linked to	Scoring has been amended. Grading boundaries have changed as more credits are available and credits for compulsory clauses have been removed. As the old criteria only make up part of the new version, it cannot be assumed that ratings are transferable.



			commercial contracts and not all manufacturers will be able to upgrade their systems promptly given the sharp change in boundaries and requirement.	
9	General	G	The timeframe for transition needs to be reviewed. Companies will need time to cope with the changes proposed and a few has ongoing commercial contracts linked to their BES6001 status. Allow for more time for the transition.	There will be a transition period to ensure organisations have time to review compliance.
10	General	G	4.4 - Include a clause requiring a materiality assessment to enable the organisation to understand its most relevant and significant impacts, which can then guide its responsible sourcing strategy, management focus, resourcing and reporting. Materiality is a long established principle that guides many leading sustainability/responsible sourcing approaches and standards. There does not seem to be any filtering of the impacts, using the principle of materiality and some organisations may not have significant water impacts, for example. How do they comply and score more highly in performance ratings if they don't have targets etc as it is not a significant impact?	As BES 6001 has a performance ranking system, it is not yet possible to include materiality assessments. Alternatives have been given to having targets in place in some sections, and credits have been made non-sequential to make more credits achievable.
11	General	G	Section 5 - Accommodate materiality into the scoring methodology. Scoring does not take account of the relative materiality of the criteria. This means some organisations are disadvantaged if they don't have the opportunity to score highly in criteria that are not relevant to them (the example of water was used above, which may be very material for some suppliers but not at all for others)	As BES 6001 has a performance ranking system, it is not yet possible to include materiality assessments. Alternatives have been given to having targets in place in some sections, and credits have been made non-sequential to make more credits achievable.
12	General	T	Section 6.1 - Following Normative References require correction EN 15804:2012 to be corrected: EN 15804:2012+A2:2019 BS EN ISO 50001:2011 to: BS EN ISO 50001:2018. Valid versions of standards should be referenced	This has been amended.
13	General	T	Proposed to add: ISO 22095:2020 Chain of custody — General terminology and models. Pls. see notes for 2.6 & 2.23	ISO 22095:2020 has been included
14	General	T	Section 6.2 - Following Informative References require correction BS EN ISO/IEC 17011:2004 to BS EN ISO/IEC 17011:2017 BS ISO 31000:2009 to BS ISO 31000:2018. Valid versions of standards should be referenced	This has been amended.
15	Section 2	T	2.5: Change to by-product definition from 2008/98/EC. This reference source has been used in sections 2.25, 2.26 and 2.37 and would result in a consistent set of definitions on waste. To do otherwise may result in conflicting definitions for the same material	This has been amended.
16	Section 2	E	2.37: Change year to 2008 in the EC reference.	This has been amended.



17	Section 2	T	2.32: Qualify if this is only the supplier in contract with the organisation or not. It is not clear from this supplier definition if this is only the Tier 1 supplier or suppliers in all tiers of the supply chain. This distinction is critical to application of later clauses of the standard.	This remains unchanged. Section 2 includes a common definition of the term 'supplier'. The requirements for suppliers are explained in further detail in section 4.3 of the standard.
18	Section 2	E	2.21: Typo with ISO 9001 year of publication. Change to "2015".	This definition and reference have been changed.
19	Section 2	G	2.11 - Definition is proposed to align to relevant international guidance: e.g., OECD Due Diligence Guidance for Responsible Business Conduct: 2018, OECD (2011), OECD Guidelines for Multinational Enterprises Due diligence is an on-going, proactive, and reactive process through which companies can ensure that they respect human rights and do not contribute to conflict. It involves embedding responsible business conduct into policies and management systems; Identification and Assessment of adverse impacts; the cessation prevention, and mitigation of adverse impacts; The tracking of implementation and outcomes; communicating on the process and how impacts are addressed; cooperation across the supply chain including for remediation. There is no reference to the internationally recognised approach to Due diligence. The definition is too limited.	This definition and reference have been changed.
20	Section 2	G	2.6 - Definition is proposed to be according to relevant international standard ISO 22095:2020: Chain of custody - process by which inputs and outputs and associated information are transferred, monitored and controlled as they move through each step in the relevant supply chain [ISO 22095:2020 Chain of custody — General terminology and models] There is no reference to an international standard for this definition, as these are already described in proposed ISO standard	This definition and reference have been changed.
21	Section 2	G	2.23- - Definition is proposed to be according to relevant international standard ISO 22095:2020: Supply chain - series of processes or activities involved in the production and distribution of a material or product through which it passes from the source Note 1 to entry: A supply chain is typically composed of a series of different organizations. [ISO 22095:2020 Chain of custody — General terminology and models] There is no reference to an international standard for this definition, as these are already described in proposed ISO standard	This definition and reference have been changed.
22	4.2.3	T	The sentence "The following criteria are not cumulative and can be scored on the basis of meeting 4.2.3.1" suggest that you get only 1 point if you have ISO 14001, 9001 and 45001. Is	4.2.3.1 simply requires management systems to be in place for quality, environment, and H&S (not



			that correct? The three standards are very different, and it would make sense to be rewarded for each?	necessarily certified MS). There are then 3 higher non-cumulative credits available - 1 for 9001, 1 for 14001 & 1 for 45001. Therefore, organisations are rewarded for each.
23	4.2.4	T	% Constituent materials should be defined in the definitions itself that can be based on mass/volume/price. Even though it has been mentioned later in 4.3, it would give more clarity if it's already mentioned in the definitions or in the current section.	This has been included.
24	4.2.4	T	For additional points: "the countries which already have supply chain act should adhere to the law and present the corresponding report as evidence. OR when their risk assessment system includes indirect suppliers or even covers the entire supply chain. Supply Chain Act being the recent topic in Europe as well as in other countries, correlating to this act can later help organisations to link the BES 6001 with their adoption to act, on annual reports and public documents.	Compliance text included in guidance document.
25	4.2.4	E	Comma misplaced in 4.2.4.1. No comma before UK.	This has been amended
26	4.2.4	T	The guide can explain what points under 4.2.4 can be achieved automatically if all suppliers have BES 6001 certification. Include a sentence in the guide explaining what points can be satisfied within 4.2.4 if a company can demonstrate that all its suppliers are BES 6001 certified.	4.2.4.1 & 4.2.4.2 focus on the organisation's own purchasing processes and therefore supplier certificates are not relevant for these clauses. The guidance doc confirms 4.2.4.3 may be achieved if all suppliers are certified to BES 6001. Supplier certification to BES 6001 may contribute to achieving 4.2.4.4, however this requirement will need to be included in the organisation's risk assessment and due diligence process.
27	4.2.4	T	Definition or explanation of "capacity building and engagement within its supply chain on the principles of responsible sourcing." I have read the standard and the guidance but still do not know what "capacity building" is supposed to mean. Is it something like 'encourage or expand the adoption' of responsible sourcing principles? The examples in the guidance do make sense for "engagement".	Requirements clarified in standard and guidance doc.
28	4.3	T	Clarify the qualification required for SME suppliers at the 80% and 90% criteria levels. It is not clear in the standard, nor the Guidance, if the qualification of SME's described at the 70% level also applies to the higher 80% and 90% criteria. This could significantly affect the points available. In our view the qualification should be the same at all levels for consistency and equitable treatment of SME suppliers.	Requirements clarified in Standard and guidance doc.



29	4.3	E	Include further examples of acceptable evidence of SME supplier compliance as guidance to organisations. The Guidance document could be improved with further detail on the evidence of compliance required from SME's. Some of the requirements appear subjective with the onus on the assessed organisation to demonstrate a supplier's compliance	Guidance document will include further details on fundamentals and compliance.
30	4.3.1	T	Should companies still track down materials to extraction point or recovery point if the 1st tier supplier of that raw material is already BES 6001 certified? Wouldn't that duplicate effort already put by the 1st tier supplier? This could be challenging in the case of products made of raw materials imported by 1st tier suppliers such as fly ash or recycled steel (for rebar). Products sourced from a 1st tier supplier with BES 6001 certification should be considered as traceable to extraction or recovery point.	As this section focuses on ISO 9001 certification, the 1st tier supplier with BES 6001 certification would need to demonstrate they have achieved the following: the higher credits in 3.2.3 (in version 3.2 of BES 6001) or the credit in 4.2.3.2 (in version 4.0 of BES 6001) AND full credits in section 3.3.1 (in version 3.2 of the BES 6001) or 4.3.1 (in version 4.0 of BES 6001) to meet the criteria in section 4.3.1 of version 4.0. This has been clarified in the guidance document.
31	4.3.1	T	Products sourced from a 1st tier supplier with 14001 or BES 6001 certification should be considered as traceable to extraction or recovery point.	As this section focuses on ISO 9001 certification ISO 14001 is not relevant., 1st tier supplier with BES 6001 certification would need to demonstrate they have achieved the following: the higher credits in 3.2.3 (in version 3.2 of BES 6001) or the credit in 4.2.3.2 (in version 4.0 of BES 6001) AND full credits in section 3.3.1 (in version 3.2 of the BES 6001) or 4.3.1 (in version 4.0 of BES 6001) to meet the criteria in section 4.3.1 of version 4.0. This has been clarified in the guidance document.
32	4.3.1	T	Can you clarify Are the points scored cumulative in that section or do you get the same number of points for tracing 80% or 90% of the constituents? Can you clarify in text?	Unless stated in the section, points are sequential. If 80% are traceable, 1 credit is awarded. If 90% are traceable, another 1 credit is available (therefore 1 for 80 and additional 1 for 90). More clarification has been added to the scheme document.
33	4.3.2	T	Clarify the qualification required for SME suppliers at the 80% and 90% criteria levels. It is not clear in the standard, nor the Guidance, if the qualification of SME's described at the 70% level also applies to the higher 80% and 90% criteria. This could significantly affect the points available. In our view the qualification should be the same at all levels for consistency and equitable treatment of SME suppliers.	Requirements clarified in standard and guidance doc.



34	4.3.2	E	Include further examples of acceptable evidence of SME supplier compliance as guidance to organisations. The Guidance document could be improved with further detail on the evidence of compliance required from SME's. Some of the requirements appear subjective with the onus on the assessed organisation to demonstrate a supplier's compliance	Guidance document will include further details on fundamentals and compliance.
35	4.3.2	T	Should companies still track down materials to extraction point or recovery point if the 1st tier supplier of that raw material is already BES 6001 certified? Wouldn't that duplicate effort already put by the 1st tier supplier? This could be challenging in the case of products made of raw materials imported by 1st tier suppliers such as fly ash or recycled steel (for rebar). Products sourced from a 1st tier supplier with BES 6001 certification should be considered as traceable to extraction or recovery point.	Guidance document details requirements for traceability to suppliers of recycled materials or by-products.
36	4.3.2	T	Products sourced from a 1st tier supplier with 14001 or BES 6001 certification should be considered as traceable to extraction or recovery point.	ISO 14001 does not confirm traceability to extraction or recovery point. Valid BES 6001 certification is accepted where suppliers can demonstrate that the requirements for certified management systems have been achieved. For suppliers certified to BES 6001 v4, 4.2.3.3 and maximum points in 4.3.2 must have been achieved, or for suppliers certified to BES 6001 v3.2, the maximum performance rating in 3.3.2 must have been achieved.
37	4.3.3	T	Can mention as 45001 or 18001 or equivalent. As only OHSAS 18001 is mentioned in the previous report.	As 45001 has replaced 18001, and 18001 has been withdrawn, it has been excluded from this version.
38	4.3.3	T	Guidance document not referring to equivalent certification for ISO 45001, should mention at least OHSAS 18001 or others.	As 45001 has replaced 18001, and 18001 has been withdrawn, it has been excluded from this version.
39	4.3.3	T	Clarify the qualification required for SME suppliers at the 80% and 90% criteria levels. It is not clear in the standard, nor the Guidance, if the qualification of SME's described at the 70% level also applies to the higher 80% and 90% criteria. This could significantly affect the points available. In our view the qualification should be the same at all levels for consistency and equitable treatment of SME suppliers.	Requirements clarified in Standard and guidance doc.
40	4.3.3	E	Include further examples of acceptable evidence of SME supplier compliance as guidance to organisations. The Guidance document could be improved with further detail on the evidence of compliance required from SME's. Some of the requirements appear subjective with the onus on the assessed organisation to demonstrate a supplier's compliance	Equivalent accepted forms of evidence for SMEs included in guidance. Guidance document also includes further details on fundamentals and compliance.



41	4.4.1	T	For SMEs provide an alternative on setting their own reduction targets/compensation of their emissions when no further reduction possible. Science based targets might not be suitable or viable for everyone.	Reference to Science Based Targets removed but targets need to be in line with net zero by 2050. For GHG targets to be meaningful, they need to be aligned to the science and without doing so, may be inadequate (e.g., target to reduce GHG's by 1% by 2025)
42	4.4.1	T	4.4.1.1 - Why are the points not cumulative in this section? Setting targets and measuring scope 3 emissions are quite different and should be encouraged?	Many smaller companies may not be in a position yet to report their scope 3 emissions.
43	4.4.1	T	4.4.1.4 - Is ISO14064-1 the only acceptable approach? How does it tie in with the GHG protocol?	Guidance amended to include additional accepted methodologies
44	4.4.1	T	Reference to "science based" should be removed. "Science based" refers to a specific initiative introduced and run by a single company, SBTi. Either remove completely or replace with equivalent wording that doesn't refer to specific company initiatives.	Criteria amended for clarity
45	4.4.1	T	Reporting to the principles of ISO 14064-1 on all scopes can be significantly complex. Restrict this item to Scopes 1 & 2.	Compulsory credit only requires monitoring of 1 & 2. Organisations can achieve additional voluntary credits if they monitor their scope 3.
46	4.4.1	T	Clarification of requirements for scope 3 emissions. Does the organisation need to trace every drop of CO2 emitted, or is it enough to identify significant sources? E.g., We buy hundreds of tonnes and need many deliveries of some materials, but only a few kilograms of others. Perhaps use a percentage range like that in 4.3	Scope 3 emissions amended to include significant sources only.
47	4.4.1	T	Clarification of "science-based targets". Are you using the term "science based" in general terms, or is there any association with the Science Based Targets Initiative organisation? https://sciencebasedtargets.org	Criteria amended for clarity
48	4.4.1	T	This section will need clearer guidance as an organisation that makes multiple products, but not all are certified to 6001, are the scope 3 emissions of the organisation as a whole or just the product assessed. Eg. if report only Scope 3 emissions for the organisation will this be acceptable for 2 points?	Either would be accepted if product specific emissions are included in organisation emission monitoring.
49	4.4.1	G	Need clarity if 'science-based targets' means only targets that have been signed off by the SBTi scheme.	Criteria amended for clarity
50	4.4.1	G	Need to confirm if ok for organisation level reporting of emissions rather than product level emissions separately.	Section 4.4. of the guidance document confirms organisation level of reporting is accepted if the organisation can confirm the reporting includes data for the manufacturing process of the products/sites under assessment.



51	4.4.1	T	The process of data collection and reporting on Scope 3 emissions can be significantly complex for specific products and processes. There are 15 different categories associated with Scope 3, most of which are not directly under the control of assessed companies. There is a need to limit the Scope 3 categories. Limit Scope 3 reporting to the most material categories only. Some companies prefer to see it restricted to company owned vehicles (including HGVs and cars). Again, not all companies would have the resource to fulfil that requirement.	Scope 3 emissions amended to include significant sources only.
52	4.4.1	T	Need to limit the scope 3 categories that need to be reported. Suggest, business travel, commuting, and waste + upstream and downstream transport by including business travel & commuting reference in 4.4.8.1 to people can be removed	Scope 3 emissions amended to include significant sources only.
53	4.4.1	T	4.4.1.3: More points required and a better definition of what constitutes the sort of study you required. 1 point for doing companywide science-based targets = the same as for biodiversity, the effort involved are not comparable. SBTi protocol only currently available for the cement sector	Reference to Science Based Targets removed - targets need only be in line with net zero by 2050.
54	4.4.1	T	4.4.1.1 & 4.4.1.2 - Reference or add definitions for the coverage of Scope 1, Scope 2 and Scope 3 emissions. There is no definition for this in ISO 14064-1 and in GHG related ISO standards for the Scope 1, Scope 2, and Scope 3 emissions. This could be defined, or reference should be given to avoid possible disputes, e.g., www.ghgprotocol.org could be referenced	References for all scopes included in guidance document.
55	4.4.1	T	4.4.1.3 - A long-term target until 2050 is referenced here. Setting of annual targets is proposed for making this clause auditable and for enabling scoring for each specific certification period until 2050. A long-term target until 2050 is unique and fixed until 2050, but auditing carried out in 3-yearly cycle for certification and scoring renewal as per ISO/IEC 17065:2012 & ISO/IEC 17021-1:2015 requirements. This may not be a short-term indication of the improvement of company's performance, as the achieved figure can fluctuate while approaching to final due date 2050. Annual milestones can be referred for enabling clients to set annual targets and monitor trends over long time. This will also enable the auditor to benchmark of reductions annually along company's transition pathway.	Guidance document clarified to confirm short term targets and annual progress review is required.
56	4.4.2	T	Why are the points not cumulative in this section?	Some organisations are not yet able to report freely and publicly. Non-cumulative credits mean companies making alternative efforts are recognised.
57	4.4.2	T	Remove reference to meeting an energy target as an award criterion. This reference to meeting a target is not consistent with the treatment of targets elsewhere in the Standard/Guidance (eg section 4.4 introduction) It disincentivises the setting of ambitious and	Reference has been removed.



			stretching targets. The guidance also appears to be setting a higher bar than the standard itself.	
58	4.4.2	Ed	Repeated words “they have”. Amend.	Text has been amended to remove the duplication.
59	4.4.2	T	Include a bonus point for ISO 50001. Why no bonus point for having a certificated management system? If it works for ISOs 9001, 14001 and 45001, then why not for 50001?	ISO 50001 certification fulfils credit 4.4.2.4. Clarified in guidance.
60	4.4.2	G	Confirm what is required by 'site-wide'. E.g., if 180 plants in scope of cert, does need evidence that applied across all sites and what evidence will be acceptable?	Criteria and guidance updated
61	4.4.3	T	An extra point for the external verification of environmental stewardship e.g., external verification for closed loop system etc. The supplementary point from the previous version have been removed. Why provide extra point in all sections for external verification but not for here?	A requirement for verification has been added.
62	4.4.3	T	This sentence is not very clear: “Actions taken to improve future resource use at end-of-life of the assessed product(s)” do you mean to encourage reuse? Or simply recycling? Or resource efficiency in current product?	End of life actions can include (but are not limited to) post-consumer retrieval schemes, close loop recycling schemes, research regarding recyclability or re-use options.
63	4.4.3	E	Change references to 4.4.3.1 and 4.4.3.2. Typo error in references	Guidance document updated.
64	4.4.3	T	The bricks example can be applicable to other types of masonry, such as concrete blocks and stone. To avoid literal interpretation by assessors, include further examples or replace “bricks” with “masonry products”	Guidance document updated.
65	4.4.3	T	Expand guidance on ‘future resource use’ and ‘product development approach for a circular economy’. In the guidance you have made allowance for ‘extend lifespan of the product’, for those like bricks with existing long life. Does the same principle not apply to ‘future resource use at end of life’ and ‘product development approach for a circular economy’? Again, these principles are already well established for bricks. As a brick manufacturer, we can and do publicise those points to customers, but if we need to show improvement, I am struggling to see how we can gain 2 points.	Requirement updated in the standard and guidance. Actions require organisations to provide evidence of significant input, involvement and support of the organisation being assessed to demonstrate that they are being fulfilled.
66	4.4.3	T	End of life assessments need to include a cut of criteria as many construction products last 20 to 100 years. Construction Products are used in infrastructure with minimum 100-year life span and ownership may change over the years	The guidance document states that products that have an established service life longer than that of a typical building fulfil the “actions to extend the lifespan of the assessed product(s)”
67	4.4.3	T	4.4.3.2 Proposed giving a reference standard for calculating & declaring recycled content. A reference to an internationally accepted standard could be referenced to ensure consistency and fairness in evaluation of companies, to also enable a fair competition amongst them.	Guidance document updated to clarify that recycled content declaration to be in accordance with ISO 14021 requirements.



			Declaration of recycled content is proposed to be in accordance with ISO 14021 or similar recognised sector standard of the assessed product.	
68	4.4.4	T	Additional Point: taking back faulty products of even after the end-of-usage from the customers for appropriate recycling or waste management. Extra points for the effort to offer proper waste management even after the product end of use.	Actions taken to improve future resource use at end-of-life of the assessed product(s) is included in section 4.4.3.
69	4.4.4	T	Remove reference to meeting a waste target as an award criterion. This reference to meeting a target is not consistent with the treatment of targets elsewhere in the Standard/Guidance (e.g., section 4.4 introduction) It disincentivises the setting of ambitious and stretching targets. The guidance also appears to be setting a higher bar than the standard itself.	Target credit remains but has been amended to include requirements for waste diversion also.
70	4.4.5	T	Allow other improvement metrics as alternatives to water intensity. The sole focus on water intensity makes credits in this section unobtainable for any organisation which has already fully optimised the water intensity of its process. In line with the principles of ISO14046 cited in the guidance, some allowance should be made for improvements in the hierarchy of sources used, for example reducing reliance on mains water or substituting rainwater for abstracted water. This would also be consistent with ISO14001 requirements for impact reduction.	Implementing sustainable water sources has been added as an alternative to setting water intensity targets.
71	4.4.5	T	Remove reference to meeting a water target as an award criterion. This reference to meeting a target is not consistent with the treatment of targets elsewhere in the Standard/Guidance (e.g., section 4.4 introduction) It disincentivises the setting of ambitious and stretching targets. The guidance also appears to be setting a higher bar than the standard itself.	Implementing sustainable water sources has been added as an alternative to setting water intensity targets.
72	4.4.5	T	The guide notes that verification at 4.4.5.4 can be satisfied by a valid EPD for the product(s) under assessment. Not every product will have its own EPD, and some products may only be covered by sector & product group EPDs. We suggest that sector EPDs are included in this Note. Amend from “a valid EPD for the products under assessment” to “a valid company or sector EPD covering the product(s) under assessment”.	Guidance Document amended to include product group EPD / Trade Association EPD.
73	4.4.6	T	Amend wording to clarify if all assessed products must have verified EPDs (or provide clarification in the guidance). It is not clear if EPD's are required for all products within the scope of the assessment to qualify for this award. Product families may be very extensive with some products outside EPD scope, e.g., if newly introduced since an EPD was issued. EPDs are valid for 5 years.	Standard/Guidance Doc confirm it is relevant to all product(s) undergoing assessment.
74	4.4.6	T	4.4.6.2: points to be awarded if companies can demonstrate they have provided data to a be used in a trade body EPD. points to be awarded if companies can demonstrate they have provided data to a be used in a trade body EPD.	Criteria removed. Points for contribution to Trade association EPD in revised credit.
75	4.4.6	T	4.4.6.3: This should relate to the publication of a company EPD for their product ranges, not every single product and every site. I.E., they need to show intent. e.g., EPD for aggregates, asphalt, cement, bricks, but not every product made by the company.	Clarified in guidance.



76	4.4.6	T	4.4.6.2 - This clause could be scored automatically based on scoring 4.4.6.3. BS EN 15804:2012+A2:2019 refers either of these standards to comply with in LCI & LCA processing.	Criteria removed. Focus on EPD.
77	4.4.7	T	Equivalent regulations/schemes can also be added to references for the hazard assessment of chemicals. Equivalent schemes outside of UK and EU can be permitted, as some of clients are in regions where these legislations not applicable but they are assessed as per their national/local legislations similar or equivalent to these.	This has been clarified in guidance.
78	4.4.8	T	4.4.8.4: This clause would require significant amount of work for an activity which may not be really material for the company and is way outside most companies' control. Remove element and re-allocate the 2 points to aspects more material and crucial for construction product suppliers, such as GHG.	Credit remains unchanged from version 3. Credit remains in place.
79	4.4.8	T	Clarification of requirements for transport of supplied materials. Does the transport policy need to trace every drop of raw material, or is it enough to identify significant sources? E.g., We buy hundreds of tonnes and need many deliveries of some materials, but only a few kilograms of others. Perhaps use a percentage range like that in 4.3.	Procedures to identify significant impacts of transport shall include all constituent materials, however only the impacts identified as appropriate and significant need to be included in the scope of the extended transport policy.
80	4.4.8	G	Need to confirm if either social / environmental impact are acceptable or will need evidence of both	Evidence of consideration of both is required. Where an organisation has analysed the social impacts and has concluded they will be minimal, focusing largely on environmental impacts is understandable.
81	4.4.8	T	4.4.8.2: remove reference to people, the CO2 of this is minimal. Concentrate on the bigger issues of transport of goods. People transport can be captured as part of scope 3 emissions.	Standard amended to include transport of products under assessment.
82	4.4.8	G	4.4.8.1 & 4.4.8.2 - Proposed describing the coverage of "... the transport of materials, goods ...". It is not clear whether the "materials" cover constituent materials and/or final products or by products. Besides, when 4.4.8.4 considered, these materials are understood to be products. This should be made clear to prevent confusions.	Standard amended to clarify scope to targets for reduction required.
83	4.4.8	G	4.4.8.3 - In requirement, it is mentioned "The organisation shall report on its transport use to stakeholders." The coverage of transport to be made clear (e.g., to refer transport of final products, goods and/or transport of constituent materials.) Definition of reporting scope can demonstrate what was transported.	Standard updated to clarify scope of reporting required.
84	4.4.8	G	4.4.8.4 - Credit score like 4.4.8.3 could be enabled also for reporting transportation of constituent materials to stakeholders, if this is not meant in 4.4.8.3. To maintain fairness for spending more effort by extending company's scope to cover also the transport of constituent materials and reporting its performance on this to its stakeholders should also be awarded, which requires further commitments and efforts.	Standard amended to recognise organisations which report transportation of constituent materials to stakeholders



85	4.4.9	G	Is the standard expecting one Biodiversity action plan for how the whole company looks to protect and enhance biodiversity (300 plus sites)? This is covered by our Biodiversity standards and policies, is separate action plan required called an action plan?	Guidance document confirms the plan will be to protect and enhance the natural environment of the site(s) under assessment. This may be in the form of standards and policies.
86	4.4.10	T	4.4.10.3 - Should more points be awarded for publication of statement? Or perhaps cumulative points?	Publication of statement is mandatory for in scope organisations. Intent of criteria is to promote transparency in those organisations that fall outside of scope of UK MS reporting requirements.
87	4.4.10	T	If 4.4.10.1 and 4.4.10.3 can be satisfied by a public statement available on the company's website, then this should be clearly explained in the Guide. Add a Note in the Guide.	4.4.10.1 requires policy commitment to respect human rights and protect workers not an annual Modern Slavery Statement published on company website. 4.4.10.3 guidance outlines requirement for annual modern slavery statements.
88	4.4.10	T	4.4.10.1: This should include a requirement to publish a Modern Slavery Statement if it is a legal requirement in the country. So not to disadvantage international certificate holders where an MSS is not required.	Guidance outlines requirement for annual modern slavery statements.
89	4.4.10	T	4.4.10.3: Applicable ONLY to countries where an MSS is not a legal requirement. 1 point only, for going beyond legal requirements for international and smaller UK companies.	Guidance outlines requirement for annual modern slavery statements.
90	4.4.12	T	Requirement for external verification of training is a bit excessive. Training and learning can take different shapes, and, in many cases, it is already verified by certificates, etc. Need to rethink external verification of training.	Verification credit continues to be included. Details of verification requirements clarified in guidance document.
91	4.4.13	T	4.4.13.3: External verification is not needed as this is already covered in ISO 14001 management systems' audits. Consider removing or add the points automatically for companies with ISO 14001 certified management systems.	As ISO 14001 does not necessarily include verification of local community liaison / complaints, the verification credit remains.
92	4.4.13	T	4.4.13.4: This requirement is vague and can result in a policy that no one is able to implement properly. Remove and consider replacing with an element about local suppliers within one of the existing clauses in 4.2.4	Element is remaining. Definitions for local, local community stakeholders, and local suppliers are provided in the guidance document.
93	4.4.13	G	4.4.13.4: Request to remove this clause as it should not be a scoring point. If want to make reference to locally source products and services where appropriate in 4.2.4 this would be more logical. Whole section on Procurement and Supplier Management, this should just be within the sustainability procurement processes.	Element is remaining. Definitions for local, local community stakeholders, and local suppliers are provided in the guidance document.
94	4.4.13	T	4.4.13.4: This requirement is vague and can result in a policy that no one is able to implement properly. Most companies have national agreements which support business operations) e.g. spare parts). Imposing such clause could hinder businesses in this context. Please remove	Element is remaining. Definitions for local, local community stakeholders, and local suppliers are provided in the guidance document.



95	4.4.13	T	4.4.13.4: This requirement is very vague and has always caused us problems. It should be removed. It results in a policy that no one is able to implement properly and is fudged as there is no value requirement. what constitutes local? 500 miles is the whole of the UK. If you are talking about local suppliers the guidance needs to be a lot more specific.	Element is remaining. Definitions for local, local community stakeholders, and local suppliers are provided in the guidance document.
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