



Form 8A: Committee decision for DIS

Secretariat: SIS	ISO/TC 292/SC N
Project number and title: ISO/CD 22301, Security and resilience – Business continuity management systems - Requirements	

This form should be sent to the ISO Central Secretariat (<http://isotc.iso.org/livelink/si/>), together with the draft of the project, by the secretariat of the technical committee or subcommittee concerned.

The accompanying document is submitted for circulation to member body vote: <input checked="" type="checkbox"/> As a DIS
Consensus has been obtained from the P-members of the committee: ISO/TC 292 Security and resilience <input checked="" type="checkbox"/> At the meeting of TC292 in Stavanger, 2018-10-12 See Resolution number 166 (Stavanger, 2018 In document N 653 <input type="checkbox"/> By ballot initiated on Click here to enter text. Please attach a copy of the ballot results (if applicable)

Listing of the P-members (NWIP, CD or Resolution)
P-members in favour: Argentina, Australia, Belgium, Canada, China, Colombia, Egypt, Finland, France, Germany, India, Indonesia, Italy, Japan, Kenya, Republic of Korea, Mexico, The Netherlands, Norway, Portugal, Russian Federation, Serbia, Singapore, South Africa, Sweden, Switzerland, Thailand, United Arab Emirates, United Kingdom, United States.
P-members voting against: -

P-members abstaining: -
P-members who did not vote: -
Remarks: -

I hereby confirm that this draft meets the requirements of Part 2 of the ISO/IEC Directives :		
Secretariat: SIS, Sweden	Date: 2018-10-31	Name/Signature of TC/SC Secretary: Bengt Rydstedt Secretary ISO/TC 292 Security and resilience

Result of voting

Ballot Information

Ballot reference	ISO/CD 22301.2 for comments
Ballot type	CIB
Ballot title	ISO/CD 22301.2, Security and resilience - Business continuity management systems - Requirements
Opening date	2018-06-06
Closing date	2018-08-15
Note	

Member responses:

Votes cast (46)	Argentina (IRAM) Australia (SA) Austria (ASI) Belgium (NBN) Brazil (ABNT) Canada (SCC) China (SAC) Colombia (ICONTEC) Denmark (DS) Egypt (EOS) Finland (SFS) France (AFNOR) Germany (DIN) Haiti (BHN) India (BIS) Indonesia (BSN) Ireland (NSAI) Israel (SII) Italy (UNI) Japan (JISC) Kenya (KEBS) Korea, Republic of (KATS) Mauritius (MSB) Mexico (DGN) Morocco (IMANOR) Netherlands (NEN) Norway (SN) Panama (COPANIT) Portugal (IPQ) Romania (ASRO) Russian Federation (GOST R) Serbia (ISS) Singapore (ESG) Slovakia (UNMS SR)
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	Slovenia (SIST) South Africa (SABS) Spain (UNE) Sweden (SIS) Switzerland (SNV) Thailand (TISI) Trinidad and Tobago (TTBS) Turkey (TSE) Ukraine (DSTU) United Arab Emirates (ESMA) United Kingdom (BSI) United States (ANSI)
Comments submitted (3)	Nigeria (SON) Pakistan (PSQCA) Poland (PKN)
Votes not cast (0)	

Questions:	
Q.1	"Do you wish to submit comments on ISO/CD 22301.2 (ISO/TC 292 N 579)?"

Votes by members	Q.1
Argentina (IRAM)	No
Australia (SA)	Yes
Austria (ASI)	Abstain
Belgium (NBN)	Abstain
Brazil (ABNT)	Yes
Canada (SCC)	Yes
China (SAC)	No
Colombia (ICONTEC)	Yes
Denmark (DS)	Abstain
Egypt (EOS)	Yes
Finland (SFS)	Abstain
France (AFNOR)	Abstain
Germany (DIN)	Yes
Haiti (BHN)	Abstain
India (BIS)	No
Indonesia (BSN)	Yes
Ireland (NSAI)	Abstain
Israel (SII)	Yes
Italy (UNI)	No
Japan (JISC)	Yes

Kenya (KEBS)	No
Korea, Republic of (KATS)	No
Mauritius (MSB)	No
Mexico (DGN)	No
Morocco (IMANOR)	No
Netherlands (NEN)	Yes
Norway (SN)	Abstain
Panama (COPANIT)	Abstain
Portugal (IPQ)	Yes
Romania (ASRO)	No
Russian Federation (GOST R)	No
Serbia (ISS)	No
Singapore (ESG)	Yes
Slovakia (UNMS SR)	No
Slovenia (SIST)	No
South Africa (SABS)	Yes
Spain (UNE)	Abstain
Sweden (SIS)	Yes
Switzerland (SNV)	No
Thailand (TISI)	Yes
Trinidad and Tobago (TTBS)	Abstain
Turkey (TSE)	Abstain
Ukraine (DSTU)	Abstain
United Arab Emirates (ESMA)	No
United Kingdom (BSI)	Yes
United States (ANSI)	Yes

Answers to Q.1: "Do you wish to submit comments on ISO/CD 22301.2 (ISO/TC 292 N 579)?"

17 x	Yes	Australia (SA) Brazil (ABNT) Canada (SCC) Colombia (ICONTEC) Egypt (EOS) Germany (DIN) Indonesia (BSN) Israel (SII)
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		Japan (JISC) Netherlands (NEN) Portugal (IPQ) Singapore (ESG) South Africa (SABS) Sweden (SIS) Thailand (TISI) United Kingdom (BSI) United States (ANSI)
16 x	No	Argentina (IRAM) China (SAC) India (BIS) Italy (UNI) Kenya (KEBS) Korea, Republic of (KATS) Mauritius (MSB) Mexico (DGN) Morocco (IMANOR) Romania (ASRO) Russian Federation (GOST R) Serbia (ISS) Slovakia (UNMS SR) Slovenia (SIST) Switzerland (SNV) United Arab Emirates (ESMA)
13 x	Abstain	Austria (ASI) Belgium (NBN) Denmark (DS) Finland (SFS) France (AFNOR) Haiti (BHN) Ireland (NSAI) Norway (SN) Panama (COPANIT) Spain (UNE) Trinidad and Tobago (TTBS) Turkey (TSE) Ukraine (DSTU)

Comments from Voters		
Member:	Comment:	Date:
Australia (SA)	<i>Comment File</i>	2018-08-15 05:03:08
CommentFiles/ISO_CD 22301.2 for comments_SA.docx		
Brazil (ABNT)	<i>Comment File</i>	2018-08-06 17:40:09
CommentFiles/ISO_CD 22301.2 for comments_ABNT.docx		
Canada (SCC)	<i>Comment File</i>	2018-08-07 19:45:45
CommentFiles/ISO_CD 22301.2 for comments_SCC.doc		

Colombia (ICONTEC)	Comment File	2018-08-15 21:04:49
CommentFiles/ISO_CD 22301.2 for comments_ICONTEC.doc		
Egypt (EOS)	Comment File	2018-08-14 09:15:05
CommentFiles/ISO_CD 22301.2 for comments_EOS.doc		
Germany (DIN)	Comment File	2018-07-27 08:49:21
CommentFiles/ISO_CD 22301.2 for comments_DIN.docx		
Indonesia (BSN)	Comment File	2018-08-14 10:41:24
CommentFiles/ISO_CD 22301.2 for comments_BSN.doc		
Israel (SII)	Comment File	2018-08-05 11:51:31
CommentFiles/ISO_CD 22301.2 for comments_SII.docx		
Japan (JISC)	Comment File	2018-08-03 06:14:05
CommentFiles/ISO_CD 22301.2 for comments_JISC.docx		
Netherlands (NEN)	Comment File	2018-08-09 14:02:45
CommentFiles/ISO_CD 22301.2 for comments_NEN.doc		
Portugal (IPQ)	Comment File	2018-08-07 16:42:56
CommentFiles/ISO_CD 22301.2 for comments_IPQ.docx		
Singapore (ESG)	Comment File	2018-08-15 08:41:21
CommentFiles/ISO_CD 22301.2 for comments_ESG.doc		
South Africa (SABS)	Comment File	2018-07-24 13:32:28
CommentFiles/ISO_CD 22301.2 for comments_SABS.doc		
Sweden (SIS)	Comment File	2018-08-15 14:29:27
CommentFiles/ISO_CD 22301.2 for comments_SIS.docx		
Thailand (TISI)	Comment File	2018-08-06 08:12:05
CommentFiles/ISO_CD 22301.2 for comments_TISI.doc		
United Kingdom (BSI)	Comment File	2018-08-13 10:21:45
CommentFiles/ISO_CD 22301.2 for comments_BSI.doc		
United States (ANSI)	Comment File	2018-08-15 21:46:19

[CommentFiles/ISO_CD 22301.2 for comments_ANSI.doc](#)

Comments from Commenters		
Member:	Comment:	Date:
Nigeria (SON)	<i>Comment</i>	2018-08-13 07:50:56
Approved		
Pakistan (PSQCA)	<i>Comment</i>	2018-08-10 13:33:38
The NMC have no objection on this Working Group.		
Poland (PKN)	<i>Comment File</i>	2018-08-13 07:45:55
CommentFiles/ISO_CD 22301.2 for comments_PKN.doc		

Template for comments and secretariat observations

Date:2018-10-26	Document: Observations on comments to ISO CD 22301.2	Project: ISO 22301 revision
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MB/ NC ¹	Line number	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment ²	Comments	Proposed change	Observations of the secretariat
JTC1/ SC27 001		Title of this document		ed	"Security and Resilience" is wrong. Only first character of first word can be capital letter. See Clause 11 of ISO/IEC Directives, Part 2:2018.	Change to "Security and resilience".	Accepted
NL 002				ge	In Annex SL the term 'documented information' is applied to replace formerly used terms such as documentation and records	Change throughout the text the noun 'document' into 'documented information'	Accepted
NL 003				ge	In Annex SL (and most other ISO MSS) the concept of procedures is not applied anymore. In this document at various place the term procedure is still applied. It should be carefully re-considered case by case whether a procedure should be indeed required.	Re-consider case by case throughout the document whether procedures should be indeed required or whether requiring a process is sufficient.	Noted
NL 004				Ge/te	<p>It seems that the concept of "risk" is used in two different ways, i.e.:</p> <p>1 A threat to the primary process of the organization (with a certain probability) which might result in a disruption and a threat to the organizations continuity/survival ("risk to business continuity");</p> <p>2 A possible event that might cause a decrease in the effectiveness of the BC Management system ("risks to the business continuity management system").</p> <p>Examples of the first type of risks/threats are: office in fire; flu pandemic, ICT cyber attack</p> <p>Examples of the second type of risks/threats are: insufficient BCM staff (e.g. no BCM Officer), no management attention for BCM; no budgets for testing and exercising.</p> <p>Note that the processes that are part of the BC management system are not the primary processes that the organization depends on for its continuity/survival. The BCM(S) processes can be regarded as secondary processes that support the continuity of the primary processes.</p>	<p>Please confirm whether or not our interpretation/analysis is correct and that ISO 22301 addresses the two types of risks that we distinguish.</p> <p>If our analysis is correct we suggest to make this more explicit in the text of the standard and make clear that 4.1/4.2, 6.1 and 8.1 are concerned with 'risks for the BCMS' and 8.2-8.5 are concerned with 'risks to business continuity' (i.e. risk to the organization's ability to continue delivery of products and services as per definition 3.24)</p> <p>This can e.g. be done by including the following note in 6.1:</p> <p>"NOTE: risks and opportunities in this subclause relate to the effectiveness of the management system. Risks related to disruption of the primary process are addressed in sub clause 8.2."</p> <p>And in 8.2:</p> <p>"NOTE: risks in this subclause relate to the disruption of the primary process. Risks and opportunities related to the effectiveness of the management system are addressed in subclause 6.1."</p> <p>If our concerns about the non-alignment of ISO</p>	<p>Noted</p> <p>Accepted to include Note, amended</p> <p>Accepted to include Note, amended (in 8.3)</p>

1 MB = Member body / NC = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

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

Template for comments and secretariat observations

MB/NC ¹	Line number	Clause/Subclause	Paragraph/Figure/Table	Type of comment ²	Comments	Proposed change	Observations of the secretariat
					<p>If a risk occurs in the secondary processes (e.g. insufficient management attention for BCM) the impact will <u>not be a disruption of a prime process</u>. Customers won't run away, etc. The only effect of such manifesting risk is a decrease in the effectiveness of the BC Management System. Over time this might result in a limitation in the desired level of resilience or even in a decrease of the resilience.</p> <p>The risks addressed in subclause 3 and 4 and 8.2 are all related to the first group: risks of disruption of the primary processes (and thus continuity/survival).</p> <p>The risks mentioned in subclause 6.1 and the related actions in 8.1 seems to focus on the secondary process: the effectiveness of the management system (“...can achieve its desired outcome...”, “...achieve continual improvement...”).</p> <p>The use of the same concept “risk” in two different ways needs to be clarified, in order not to cause confusion.</p> <p>The understanding of context and stakeholders (subclause 4.1 and 4.2) is related to the BCMS risks (second type) identified in 6.1 which results in actions implemented in 8.1 (note that 8.1 is therefore the operational planning and control of the BCMS processes).</p> <p>The BC risks (first type) are only addressed in 8.2 and further without any connection to the context (subclause 4.1 and 4.2).</p> <p>Note that for the BCMS the standard addresses risk <u>and opportunities</u> and for BC only risks</p> <p>ISO 22301 is unique in making distinction between these two types of risks to be addressed. Widely applied standards such as ISO 9001, 14001, 27001 and 45001 address only one ‘type’ of risk in clauses 4, 6 and 8: i.e. the risks addressed by applying the system such as ‘quality risks’,</p>	<p>22301 with other widely applied standards are shared, please reconsider the comments made by NEN on CD.1 22301 where we suggested to re-locate (not change) various subclauses from clause 8 to clauses 6 and 4. With these proposals we also achieved that ISO 22301 focusses on managing risks and opportunities for business continuity and not (also) on managing risks for the management system</p>	

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Template for comments and secretariat observations

Date:2018-10-26

Document: Observations on
comments to ISO CD 22301.2

Project: ISO 22301 revision

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					'environmental risks', 'information security risks' and 'OH&S risks'. Therefore integrated application of ISO 22301 with these other standards is hampered whereas it was the intent of introducing the HLS as structure and core requirements for MSS to enhance the integrated application.		
SE 005		All		Ge	Annex SL is a structure used by the major management systems such as ISO 9001 and ISO 14001. Sweden believe that we should follow this structure as much as possible. We think this document should be a short document and it should follow the annex sl structure. We believe that this document describe to much of how. One example of this is decribed in our comments in section 4.1	Make sure that the next version clearly marks annex sl text. All additional text in addition to annex sl, as far as possible, should be moved in to 22313. Especially the text describing how.	Noted
US 006A	Page v	Drafting Note, first paragraph, last sentence	Table	Ed	Drafting note states "This is only to facilitate analysis and will not be incorporated in the final version of ISO 45001."	Amend drafting note to read: "This is only to facilitate analysis and will not be incorporated in the final version of ISO 22301."	Superseded
US 006	64	Contents		Ed	The term 'programme' is spelt in UK English, whereas many words are spelt in American English throughout. Consistency is required.	Complete an American English spell-check on the completed document.	Noted. Will follow ISO rules.
JTC1/ SC27 007		Contents (Table of contents)		ed	"Foreword" is not included.	Add "Foreword" to Contents.	Noted – will be automatically added for next draft
JTC1/ SC27 008		Contents (Table of contents)		ed	"Introduction" is not included.	Add "Introduction" to Contents.	Noted – will be automatically added for next draft

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JTC1/ SC27 009		Contents (Table of contents)		ed	"Bibliography" is not included.	Add "Bibliography" to Contents.	Noted – will be automatically added for next draft
ZA 010				ed	Please consider numbering for easy referencing. Some areas of the document use a dash (-) some use alphabet, some use numbers. Please review!		Accepted
COL 011	638-648 658-660 671-673 690-694 733-739 751-754 817-819 849-853 892-894 968-974 1013- 1016 1031- 1034	5.1 5.2 6.1 6.2 7.5.1 7.5.3 8.3.1 8.4.1 8.4.3 9.2 9.3.2 10.1		ed	A letter or number is needed in theses bullets. Other MS Standards have added them. It is not a matter of style, as it is written is not easy to understand the whole content	A letter or number is needed in theses bullets. Other MS Standards have added them. It is not a matter of style, as it is written is not easy to understand the whole content	Accepted
US 012	General	General	Multiple	Ed	All bullets need a letter or a number. This was a comment from several countries on CD 1. Other MS standards have added letters and numbers to bullets. It should not matter the current editorial style set by ISO if their style makes it difficult to use the standard. We need to make the standard useable by companies and auditors which is more important than waiting for ISO to correct their template. Some of the bullets are new and not part of the required ISO MS standard content so should certainly include letters or numbers.	Add letters or numbers to the bullets: 638-648 658-660 671-673 690-694 733-739 751-754 817-819 849-853 892-894 968-974	Accepted
JTC1/ SC27		00.01		ed	List numbers are wrong. a), b), c) and d) appear two times in 0.1.	List numbers should be as follows. a) b) c)	Accepted

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013					See 23.3 of ISO/IEC Directives, Part 2:2018.	1) 2) 3) i) ii) iii) a), b), c) and d) should appear once only in 0.1 to avoid confusions of referencing.	
US 014	General	General	Multiple	Ed	Formatting recommendations noted in the proposed change column of this row	Line 138 – remove “and “ and end with a period. Line 178/180 – remove two instances of “or” Line 189 – add “and” Line 217 - add “and” Line 614 - add “and” Line 620 - add “and” Line 665 - add “and” Line 672 - add “and” Line 725 – add a “.” at the end of the sentence Line 732 - add a “.” at the end of the sentence Line 743 – add “and” Line 747 – add “and” Line 753 – a dd “and” Line 758 – Add a period at the end of the sentence Line 796 – add “and” Line 871 - add “and” Line 893 - add “and”	Noted.

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						Line 907 - add "and" Line 955 - Add a period at the end of the sentence Line 957 - Add a period at the end of the sentence	
CA 015					Drop the date/edition reference to 22301	(or correct it to '2018'):	Superseded
DE 040 016			Own standard (similar to ISO 27002)		The standard does not indicate any possible threats.	Create own standard to list possible threats or add possible threats as an annex.	Not accepted
DE 046 017			Supplement to an Annex		The ISO standard does not specify any requirements for the examination of the necessity of measures.	Include a Annex to requirements on the continuity planning of the four resource categories (personnel, IT, infrastructure and supplier/provider)	Not accepted
CA 018		Introduction; General;			This International Standard provides guidance, where appropriate, on the requirements specified in ISO 22301:2012		Not accepted – comment relates to ISO 22313
CA 019		00	Figure 1		Use clearer diagrams to replace Figures 1-3,5,6 which are low res. Clarity and simplicity is to be desired. Do we have access to a graphic designer?	Use clearer diagrams to replace Figures 1-3,5,6	Not accepted – comment relates to ISO 22313
CA		00	Figure 4		Figure 4 - remove 'Interested parties' at the top of the chart. It is unnecessary, since the information	Remove 'Interested parties' at the top of the chart.	Not accepted – comment relates to ISO 22313

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020					is in the figure 4 description. BTW, will the ISO editors correct/standardize the fonts in the diagrams?		
EOS 021	99	00.01 introduction			Note : should be given to respecting the privacy of any information to recommended from other organization which is information exchanged	I think should be added the privacy and protection of information that is not allowed to be circulated or published as a note	Noted. No text provided.
AU 022	101	00.01		ED	Needs to be consistent with other simplifications	...requirements to implement and maintain an ...	Noted – editorial review
FR1 001 023	103	00.01		te	Security is a second purpose of BCMS. It is necessary to avoid an ambiguity about BCMS. BCMS has an explicit purpose which is the organization's ability to continue to operate (business continuity) and an implicit but real purpose which is to protect people (personnel ...), environment and assets. The second has even a priority, namely for protection of people. It works when there no other operational management system focused on security (such as ISO 14001, ISO 27001). It would be better to clarify that issue.	Modify as follows: (line 103)... overall ability to continue to operate and to ensure the security following a disruptive incident Alternative: (line 107): “b) ensuring security by protecting life, property and environment; »	Not accepted
FR2 002 024	103	00.01		ge	To emphasize the security aspect	“The BCMS is to provide and maintain controls and capabilities for managing and securing an organization's overall ability to continue to operate following a disruptive incident. In achieving this, the organization will be:”	Not accepted
US 025	104	00.01		Ed	Delete the phrase “will be” and insert the word “can.” This will make line 104 through line 121 more efficient and effective by changing the section from future passive to future active.	In achieving this, the organization can:	Accepted with modification – “is”
US 026	103-104	00.01	Paragraph 2	Ed	As currently worded, it is unclear if this paragraph is intended to focus on the BCMS or the organization.	Amend to read: “The purpose [or goal] of the BCMS is to enable an organization to continue to operate following a disruptive incident. In so doing, the organization will be in a position to: ”	Accepted with modification – restructured as 0.2

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US 027	106 - 121	00.01 General	Paragraph 2, sub-bullets a) – o)	Te	<p>Assume this is a list of objectives that will be derived from the implementation of the BCMS although it is not clear.</p> <p>This section is overall verbose and could benefit from significant editing by WG2.</p>	<p>WG2 should justify the inclusion of each sub-bullet but at minimum consider the removal of sub-bullets: c), d), f), h), i), k), l), m), n), o)</p> <p>If WG2 will not delete, I have amended the sentence structure to read as follows but WG2 should review for differences and logically group them together:</p> <p>“a) support its strategic objectives; b) protect the life, property and environment of itself, and its stakeholders; c) contribute to its organizational resilience; d) support the interests of its employees; e) address its operational vulnerabilities; f) improve its capability to remain effective during disruptive incidents; g) protect and enhance its organization’s reputation and credibility; h) consider the expectations of its interested parties; i) reduce the direct and indirect costs of its disruptive incidents; j) reduce its legal and final exposure; k) demonstrate its ability to control its risk effectively and efficiently, by acting proactively; l) make its business partners confident in its success; m) create a competitive advantage for itself; n) enable it to meet customers’ expectations , in terms of supply security and stability; o) improve its performance, even in case of events or situations that reduce operational capability.</p>	Accepted with modification – restructured as 0.2
BR1 028	106 to 121	00.01	Paragraph	Te	<p>Organize the topics in a logic sequence (e.g., from strategic to operational or in a BSC like frame). Please read suggested perspectives and items from bottom to top. Perspectives are only to make reading easier, and not to be considered in the</p>	<p>[Business perspective]</p> <ul style="list-style-type: none"> • 106 a) supporting its strategic objectives; • 119 m) creating a competitive advantage; 	Accepted with modification – restructured as 0.2

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					<p>final version of the document)</p> <p>To support my suggestion, I point out that items "a" to "f" in section 1 seems to be ordered in crescent sequence of benefit (lines 211 to 218)</p>	<ul style="list-style-type: none"> 112 g) protecting and enhancing an organization's reputation and credibility; 108 c) contributing to organizational resilience; [Financial perspective] 117 l) making business partners confident in the organization's success: banks and investors will be more 118 willing to finance its business; 115 j) reducing legal and financial exposure; 114 i) reducing direct and indirect costs of disruptive incidents; [Interested parties perspective] 107 b) protecting life, property and environment; 113 h) considering the expectations of interested parties; 109 d) supporting employee interest; [Internal processes perspective] 120 n) enabling organizations to meet customers' expectations, in terms of supply security and stability; 111 f) improving its capability to remain effective during disruptive incidents; 121 o) improving performance, even in case of events or situations that reduce operation capability. 116 k) demonstrating organization's ability in controlling its risk effectively and efficiently, by acting proactively; 110 e) addressing operational vulnerabilities; 	
UK 029	106-121	00.01		Te	The order of these points might be changed to emphasise key items first.	Change order to b,c,a,n,i,j,f,e,g,k,d,l,h,m,o	Accepted with modification – restructured as 0.2
US 030	106	00.01		Ed	Delete “supporting”	Insert “support”	Superseded

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US 031	107	00.01			Delete “protecting”	Insert “protect”	Superseded
US 032	108	00.01			Delete “contributing”	Insert “contribute”	Superseded
UK 033	109	00.01		Ed	This says “Supporting employee interest” but I am not sure what this is supposed to mean. Do we mean “interests”?	Change to “employee interests” if that is what is meant. If not then meaning needs clarity or we should remove it.	Accepted to remove
US 034	109	00.01		Te	It’s unclear what and how to even measure “supporting employee interest” means.	Delete line	Accepted
US 035	109	00.01			Delete “supporting”	Insert “support”	Superseded
US 036	109	00.01 General	Paragraph 2, sub-bullet d)	Editorial	It seems limiting to support employee interests when so much of the Standard is focused on interested parties (of which personnel who work for the organization are a part – defined in Section 3)	Remove this sub-bullet. If WG2 does not agree, then this sub-bullet needs to read: “d) supporting employee interests;”	Accepted
US 037	110	00.01		Te	This is an overly broad statement for this specific standard	Delete line	Not accepted
US 038	110	00.01			Delete “addressing”	Insert “address”	Superseded
US 039	111	00.01			Delete “improving”	Insert “improve”	Superseded
US 040	111	00.01		Te	The word “effective” in this context is not defined may be interpreted in many different ways	Remove “to remain effective” and replace with “to meet organizational objectives”	Not accepted
US 041	112	00.01			Delete “protecting and enhancing”	Insert “protect and enhance”	Superseded
US 042	112	00.01	g)	Te	Suggest “protecting and enhancing an organization’s reputation and credibility” is reworded to...	“protecting and enhancing an organization’s brand and reputation”.	Not accepted
US 043	112	00.01 General	Paragraph 2, sub-bullet g)	Editorial	All sub-bullets refer to the organization. No need to repeat.	Amend to read: “g) protecting and enhancing its reputation and credibility;”	Accepted

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ZA 044	112	00.01		ed	Remove the words “an organisation’s” as it is already mentioned in 104	g) protecting and enhancing its <u>(an organization’s)</u> reputation and credibility;	Accepted
US 045	113	00.01			Delete “considering”	Insert “consider”	Superseded
US 046	114	00.01		Ed	Delete “reducing”	Insert “reduce”	Superseded
US 047	114 / 115	00.01	i) & j)	Te	Mitigating rather than reducing?	i) Mitigating direct and indirect costs of disruptive incidents j) Mitigating legal and financial exposure	Not accepted Technically it’s the same however “mitigating” is more in keeping with the management of risk - Agreed
UK 048	115	00.01		Te	For consistency with use elsewhere I think this should read “reducing legal, regulatory and financial exposure”	Change to “reducing legal, regulatory and financial exposure”	Not accepted
US 049	115	00.01		Ed	Delete “reducing”	Insert “reduce”	Superseded
AU 050	116	00.01		ED	Need o improve readability	...demonstrating its ability	Accepted
AU 051	116	00.01		TE	Risk is too generic	Consider ‘operational risk’ or ‘...ability for managing risk more effectively ...’	Not accepted
UK 052	116	00.01		Ed	Somewhat clumsy wording which might be clearer	Change to “demonstrating proactive control of risks effectively and efficiently”	Accepted
UK 053	116	00.01		Te	I suggested re-wording for clarity but we might also consider whether “risk” is quite the right word in this context. It is not all risks so perhaps we need to qualify this in some way. “risk of business disruption” perhaps?	Change to “demonstrating proactive control of risks of business disruption effectively and efficiently”	Accepted
US 054	116	00.01		Ed	Delete “demonstrating organization’s ability in controlling”	Insert “demonstrate organization’s ability to control”	Superseded
US 055	116	00.01		Ge		Add the word “the” before “organization’s”	Not accepted – see AU 050
US 056	116	00.01 General	Paragraph 2, sub-bullet k)	Ed	All sub-bullets refer to the organization. No need to repeat.	Amend to read: “k) its ability in controlling its risk effectively and	Partially Accepted

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						efficiently, by acting proactively;”	
ZA 057	116	00.01		ed	Remove the words “an organisation’s” as it is already mentioned in 104	demonstrating it’s ability in controlling its risk effectively and efficiently, by acting proactively;	Partially Accepted
UK 058	117-118	00.01		Te	The general point is sound but I am wary of the statement “banks and investors will be more willing to finance its business”. I am not sure there is any evidence of this as business continuity would be such a marginal issue to most finance decisions. If there is some evidence then leave as is.	Change to “making business partners confident in the organization’s success;” and delete rest of text of bullet point	Accepted
US 059	117	00.01		Ed	Delete “making”	Insert “make”	Partially Accepted
US 060	117-118	00.01		Ge	Content after the colon is not needed as its guidance and very limited in applicability	Delete	Accepted
US 061	117 - 118	00.01	Paragraph 2, sub-bullet l)	Ed	All sub-bullets refer to the organization. No need to repeat. How do you know that banks and investors will be more willing to finance its business? This phrase has no value.	Amend to read: “l) making business partners confident in its success.” Modify to read, or preferably delete: “: banks and investors will may be more willing to finance its business”	Accepted
ZA 062	117	00.01		te	I do not believe. this sentence is necessary. It focusses on banks and investors but partners could be more than these. A partnership is not only about financing. Remove this sentence “banks and investors will be more willing to finance its business;”	making business partners confident in the organization’s success	Partially accepted
AU 063	119	00.01		TE	One might argue that everyone should have BC anyway and the not having BC would create a loss of competitive advantage	remove	Not Accepted
US 064	119	00.01		Ed	Delete “creating”	Insert “create”	Superseded
US 065	120	00.01		Ed	Delete “enabling”	Insert “enable”	Superseded
US	120	00.01	Paragraph 2,	Ed	All sub-bullets refer to the organization. No need to	Amend to read:	Accepted ‘its’

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066			sub-bullet n)		repeat.	"n) enabling its ability to meet customers' expectations, in terms of supply security and stability;"	
ZA 067	120	00.01		te	Remove first part of sentence	Will be able to meet customers' expectations, in terms of supply security and stability	Partially accepted - deleted
ZA 068	121	00.01		ge	Review sentence	improving its performance, even in the case of events or situations that reduce their operational capability	Partially accepted - deleted
UK 069	121	00.01		Te	Can someone explain this point, I am not sure what this means. I improve despite a disruptive incident?	Delete unless justified	Accepted
US 070	121	00.01		Ed	Delete "improving"	Insert "improve"	Superseded
US 071	121	00.01		Te	Bullet O is a more specific version of G; also, the word "improving" is inappropriate here	Either combine the bullets, or if keeping them separate, replace "improving" with "sustaining"	Superseded
US 072	121	00.01	Paragraph 2, sub-bullet o)	Ed	Grammatical error. "...operation..." should read "...operational..."	Amend to read: "o) improving performance, even in case of events of situations that reduce operational capability."	Accepted
US 073	123-124	00.01		Ge	I thought we decided to get rid of "business continuity management" throughout the standard	Remove "management"	Accepted
US 074	123 - 124	00.01	Paragraph 3, first indent	Ed	A decision was made to remove all references to the phrase "business continuity management".	Amend to read: "- understanding the organization's needs and the necessity for establishing business continuity policies and procedures."	Partially accepted to remove 'management'
US 075	126	00.01		Ge	The word "after" is inconsistent with other changes made in Australia	Replace with "following the onset of..."	Accepted with modification
US 076	132	00.01		Ge		Add the acronym "BCMS" after the word "to"	Not accepted
PL 077	137	Introduction	00.1 c) V.	ed	Unnecessary "and" at the end of the sentence	v) management review, vi) continual improvement; and	Accepted
US 078	137	00.01	Paragraph 3, sub-bullet c)	Ed	Superfluous "and" as in "management review, and"	Amend to read: "management review,"	See PL 077

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			v)				
ZA 079	137, 138	00.01		ed	Remove the “and” from both lines	Management review Continual improvement	Accepted
NL 080	139	00.01	Bullet d	te	The purpose of the documented information of a management system is not primarily providing auditable evidence.	Change bullet d as follows: d) documented information supporting operational control and enabling performance evaluation.	Accepted
US 081	139	00.01	Paragraph 3, sub-bullet d)	Ed	The wording can be improved.	Amend to read: “d) documentation providing auditable evidence of compliance and conformity.”	Not accepted, see NL080
JP1 082	140-151	00.02		ge	It is necessary to explain the relationship between PDCA and framework in this standard like Fig 1 of ISO 14001 and Fig 2 of ISO 9001	Add Figure indicating relationship between PDCA and framework in this standard	Not accepted
US 083	149 - 151	00.02		Ed	The information in this paragraph appears in Clause 0.1.	Remove the paragraph in its entirety.	Accepted
UK 084	149	00.02		Te	I think we have tried to make our language more consistent throughout so perhaps the use of “continuity management” in this sentence now looks odd.	Change “continuity management” to “business continuity”	Superseded
EOS 085	159	00.03			Please Emphasis on the importance of respect privacy during the exchange of information from the published and sharing any information causes any threats or problems		Not accepted
AU 086	160	00.03		TE	There seems to be no point to this Note in the context of this section	Remove	Accepted
US 087	160	00.03		Ge	The word “requirements” is not needed	Change “process” to “processes” and remove “requirements”	Superseded
FR3 088	161	0.3		ge	Clause 7 is a component of Do not of Plan. Develop relevant competences at right level by	Modify as follows: “Clause 7 is a component of Plan Do . It supports	Not accepted

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					implementing awareness, training sessions, communication, clear documented information are “doing” because part of the implementation and of building the BCM (it is beyond Plan)	BCMS operations as they relate to establishing competence and communication on a recurring/as-needed basis with interested parties, while documenting, controlling, maintaining and retaining required documentation.”	
EOS 089	162	00.03			Please Emphasis on the importance of respect privacy during the exchange of information from the published and sharing any information causes any threats or problems		Noted
US 090	168	00.03		Ge		Add “and continual improvement” after the word “non-conformance”	Accepted
UK 091	168	00.03		Ed	Line missing a bullet point	Include “—” at start of line	Accepted
NL 092	168	00.03		ed	“-“ is missing	Change to: “- Clause 10 is...”	See UK 091
JP2 093	168	00.03	Para 9	ed	Insert “-“ beginning of sentence.	- Clause 10 is ...	See UK 091
US 094	168	00.03	Paragraph 1, seventh indent	Ed	Sub-clause does not follow the updated editing convention.	Indent this sub-clause.	See UK 091
BR2 095	170 to 193	00.04	Paragraphs	Editorial	This section is more comprehensive than subsections 0.2 and 0.3, breaking the specialized sequence in the description.	Subsection "0.4 Contents of this document" come right after subsection 0.1, leaving subsections 0.2 and 0.3 as is.	Not accepted
ID 096	173	00.04	1	ge	To make this statement open ended for the future it should not include such as those for quality, occupational health and safety, energy, environmental, security or financial management, though its elements can be aligned or integrated with those of other management systems.	This document does not include requirements specific to other management systems, though its elements can be aligned or integrated with those of other management systems.	Accepted
NL	176	00.04	3 rd par.		This subclause is titled ‘contents of this document’;	Delete lines 176 - 182	Not accepted

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097					these lines (176 – 182) are about the possible usages of the requirements. Furthermore these statements are contrary to the 'conformity assessment neutrality' principle of ISO and replaced by the link to the ISO website in the foreword (line 97)		
JP3 098	176-182	00.04			No need to mention the type of certification. And refer to 3.1 of ISO/IEC directive part 2	Delete line 176 to line 182	Not accepted
JP4 099	183-185	00.04			As mentioned in JP 1 comment, these sentences are no need to be mentioned by providing figure indicating relationship between PDCA and framework in this standard	Delete these sentences and insert Figure indicating relationship between PDCA and framework in this standard	Not accepted
US 100	184-185	00.04		Ge	Do we need to include "to be used to assess conformity of this document"? This language further contributes to the confusion that ISO standards are used for certification rather than performance.	Recommend deleting if possible.	Not accepted
EOS 101	189	00.04			What is meaning of develop objectives for the information exchange	Not clarify because it should be clear from beginning to implement other step so how develop ????	Not accepted
AU 102	197	01		ED	Doesn't read right	Delete 'for a business continuity management system'	Accepted
US 103	197	01	Paragraph 1	Ed	Clause 0, sub clause 0.1, paragraph one (rows 101-102) includes the BCMS acronym. It's unclear why the body of the standard does not use the BCMS or at very least use it in this opening sentence.	Amend to read: "This document for a business continuity management system (BCMS) specifies requirements to...." Or "This document for a BCMS specifies requirements to...."	See AU 102
UK 104	197 & 204	01		Ed	The first use of "business continuity management system" is in line 197 so the (BCMS) explanation	Put (BCMS) in line 197 and change line 204 accordingly	Not accepted – See AU 102

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					should appear here and not in line 204		
FR4 105	198-199	1	Scope	te	Security is not mentioned in the scope. The scope shall be aligned with the TC 292 title and domain	Modify sentence: “a documented management system to secure , protect against, reduce the likelihood of occurrence	Not accepted
EOS 106	196	1 scope			Note : should be given to respecting the privacy of any information to recommended from other organization which is information exchanged	I think should be added the privacy and protection of information that is not allowed to be circulated or published as a note	Noted
NL 107	198	01	1 st par.		The focus should not be on a ‘ <u>documented</u> management system’.	Delete ‘documented’	Accepted
AU 108	199	01		TE	Does a BCMS actually reduce the likelihood of the occurrence of disruptive incidents?	Remove “reduce the likelihood of occurrence”	Not accepted in relation to text moved to Intro
UK 109	204	01		Te	Current wording: ‘This document defines uniformity in the structure of a Business Continuity Management System (BCMS)’ This is not correct and suggests that every BCMS should have the same structure. The only requirement is that the BCMS whatever its structure, conforms to the requirements of the standard	Remove this sentence	Accepted with modification in text moved to Intro
DE 001 110	204 – 209	01			This paragraph seems appropriate for an introduction but is not really what is expected of the scope of a MSS	Consider moving to the introduction Delete paragraph here	Accepted
DE 035 111	204	1 Scope		ge	I think that the document not only defines the structure, but also the basic / relevant functions.	Add “functions” are something similar to this effect.	Superseded
US 112	204	01	Paragraph 3	Ed	Clause 0, sub clause 0.1, paragraph one (rows 101-102) includes the BCMS acronym. It’s unclear why the body of the standard does not use the BCMS or at very least use it in this opening sentence. Also, uniformity is not defined, it is established.	Amend to read: “This document defines the structure of a BCMS:....”	Superseded – see new 0.1

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ZA 113	204	01		ed	Review the sentence	This document describes the process to establish, implement and maintain a business continuity management system (BCMS) in a uniform and structured manner.	Superseded – see new 0.1
JTC1/ SC27 JP 06 114		01	3 rd para	ed	"should", "may" and "may not" are included. See 14.2 of ISO/IEC Directives, Part 2:2018.	Remove 3 rd para.	Accepted with modification – moved to new 0.1
AU 115	205	01		TE	The context of the use of BCMS is incorrect	Replace “a BCMS” with “Business continuity (BC)”	Accepted – see new 0.1
AU 116	206	01		GE	Remove extraneous words	Remove “such”	Accepted – see new 0.1
UK 117	206	01		Ed	Missing word?	“pursuing its objectives”	Superseded
US 118	206 - 209	01	Paragraph 3	Te	In the context of this paragraph, the phrase doesn't mean anything. Furthermore, the language can be tightened up.	WG2 to consider the value of this statement If WG2 determines it has to stay, amend to read: “the outcomes of maintaining such a BCMS are shaped by the organization's legal, regulatory, operational, organizational and industry requirements, products and services provided, processes employed, size and structure, and requirements of its interested parties.”	Accepted – see new 0.1
US 119	207	01	Paragraph 3	Ed	The term “products and services” is left dangling.	Amend to read: “...the products and services provided,.....”	Accepted – see new 0.1
US 120	211	01	Paragraph 4, sub-bullet a)	Ed	Remove “establish”; add “continually”;	Amend to read: “a) implement, maintain and continually improve a BCMS;”	Partially accepted with modification - agreed to simplify to “implement and maintain”
US 121	213	01	Paragraph 4, sub-bullet c)	Te	I do not understand what is meant by “demonstrate conformity to others”. Other what – policies, organizations, interested parties? Is it saying that the business continuity policy of other organization's with a BCMS conform to this standard? It's very unclear.	WG2 to consider the value of this statement and unless there is some good reason to retain it, propose it be removed	Accepted

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ZA 122	213	01		te	“demonstrate conformity to others;” This sentence is misplaced and has no meaning	Remove this	Accepted
US 123	216	01	Paragraph 4, sub-bullet e)	Te	First word does not following same writing convention as in other sub-bullets. Further the wording in this sub-bullet should align with clause 3.24	Amend to read: “need an ability to continue delivery of products and services within timeframes at acceptable predefined capacity relating to a disruptive incident;”	Accepted
US 124	218	01	Paragraph 4, sub-bullet f)	Ed	First word does not following same writing convention as in other sub-bullets. Further, the sentence is not well written when read as: “This document is applicable to all types and sizes of organization thatf) enhances its resilience through the effective application of the BCMS.”	Amend to read: “seek to enhance its resilience through the effective application of the BCMS.”	Accepted
ZA 125	218	01		te	This sentence does not flow as a sub bullet	Seeks to enhance its resilience through the effective application of the BCMS	Accepted – see US 107
SE 126	225	02		Te	The reference to ISO 22300 should be UNDATED to ensure that the latest version of the document is applicable and that revisions can be made of ISO 22300 without revising 22301 at the same time. Basically all other Tc 292 document make an Undated reference.	Delete 2018	Superseded No normative reference
SE 127	227	03		Te	See previous comment on undated reference	Delete 2018	Superseded No normative reference
SE 128	231	03		Te	Definitions that are already covered by the ISO 22300 should not repeated nor changed.	Delete all terms that can be found in ISO 22300. Repetition of definitions causes severe problems when revising ISO 22300 because one change will lead to that all documents repeating the term will have to be revised too. Suggestion to change definitions in ISO 22300 should be sent to WG 1 which will soon initiate a 3 rd version of this document.	Noted – will liaise with TC292 WG1 re all proposed changes to 22300 terms
JTC1/ SC27		03	1 st para	ed	Introductory sentence is wrong. See 16.5.3 of ISO/IEC Directives, Part 2:2018.	Choose the sentence from 16.5.3 of ISO/IEC Directives, Part 2:2018.	Standard ISO text to be updated

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JP 07 129							
JTC1/ SC27 JP 08 130		03.xx		ed	Term numbers are wrong. See 16.5.5 of ISO/IEC Directives, Part 2:2018.	Term numbers should be in sequence from 3.1.	Noted.
JTC1/ SC27 JP 09 131		03.xx		ed	Introductory sentence of Clause 3 means that terms defined in ISO 22300:2018 are already included in this document.	Delete all terms copied from ISO 22300:2018, or move ISO 22300:2018 from the introductory sentence of Clause 3 to Bibliography. And if ISO 22300:2018 is removed from Clause 3, it should also be removed from Clause 2.	Noted – will liaise with TC292 WG1 re all proposed changes to 22300 terms
US 132	226	03		Ed	The term “capacity” is missing from Clause 3 Terms and definitions.	Include the term “capacity” to read: “capacity Combination of all the strengths and resources (3.193) available within an organization (3.1580, community (3.42) or society that can reduce the level of risk (3.199) or the effects of a crisis (3.59).”	Not Accepted
US 133	226	03		Ed	The term “disruptive incident” is missing from Clause 3 Terms and definitions.	Include the term “disruptive incident” to read: “disruptive incident event that impacts the organization’s (3.158) ability to perform business as usual.”	Already included as 3.xxx - see line 232 in CD2. Amended.
US 134	226	03		Ed	The term “incident” is missing from Clause 3 Terms and definitions.	Include the term “incident” to read: “incident event that might be, or could lead to, a disruption, loss, emergency or crisis.”	Accepted with modification – added with amendment
US 135	226	03		Ed	Definition is missing for: Implement	Include the term “implement” to read: “implement establish the parameters for the BCMS and put them into operation”	Not accepted
US 136	226	03		Ed	Definition is missing for: Resource	Include the term “resource” to read: “resources personnel, asset, facility (3.90), equipment, material, product or waste that has potential value	Not accepted Agreed to delete ‘resources’ definition – use ordinary meaning

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						and can be used" [Note use of word "personnel" has been added to the definition found in ISO 22300]	
US 136A	784	08.02.2	1st paragraph, sub-bullet a)	Te	Impact categories have not been defined in the Standard.	WG2 need to define what is meant by "impact categories" and add to Section 3 Terms and definition. Examples may include: Financial, operational, regulatory, reputation	Not accepted
FR5 137	232	3		te	Need of new terms and definitions Solution is an important term in this document and should be defined to explain the link with procedures, actions... Prevention is a concept proposed in line 813 Interaction would be an interesting term to be defined: it is used in this document in line 634, and has numerous synonyms (relationship, interdependency...) Function is often used in this document (in lines 411, 438, 447, 539, 680), namely for definitions of important terms: in particular, the difference with the notion of process should be clarified.	1 - Add the following terms in § 3 Terms and definitions: Solution (2 propositions: general or with the risk approach) : - Proposition 1: all decisions, actions to tackle a difficulty. - Proposition 2: all decision, actions to treat a risk and to respond to its occurrence Prevention : set of measures taken to avoid disruptions on an organization Interaction: Exchange between the elements of a system (organization) and with environment, namely between the interested parties 2 - For the use of "Function": replace by another term to prevent ambiguity or add a definition specific to its use in the document.	Not accepted
DE 020 138	232 – 234	03.xxx			In the end this definition should not be an additional definition left in 22301 but it should become a definition within 22300 – if possible from the very beginning. The definition seems to broad and should be more specific as not all events that impact the ability to perform business as usual are disruptive (compare definitions 3.24, 3.27 and 3.70)	Change line 234 to: <i>event</i> (3.82) impeding a substantial part of the <i>organization's</i> (3.158) operations/activities preventing it from delivering its services and/or products and achieving its objectives Consider deleting either term 3.xxx or term 3.70	Accepted to delete 3.xxx
NL 139	234	03			The words 'business as usual' are ill-defined. It is better to use similar words as in the definition of business continuity for clarity and consistency	Change definition into: event that impact the organization's ability to continue delivery of products and services	Superseded – term deleted
DE	235 – 239	03.xxx			Consider using singular and a shorter more	Change lines 235 - 239 to:	Superseded

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021 140					concise definition	3.xxx resource asset, manpower, skill, information, know how, technology (including property rights) available to the <i>organization</i> (3.158) when operating/performing its activities	
FR6 141	236	3		ed	“Information” is mentioned twice. “And” is mentioned twice. To simplify	“resources all assets, people, skills, information, technology (including plant and equipment), premises, infrastructures, and supplies, data and information (whether electronic or not) that an organization (3.158) has to have available to use, when needed, in order to operate and meet its objective (3.153)”	Superseded – term deleted
PL 142	237	03.XXX resources		ge	Definition of resources contains twice word “information”. I think needlessly.		Superseded – term deleted
US 143	237	03		Ed	Duplicate inclusion of “information”.	Recommend deleting the fifth word in the definition.	Superseded – term deleted
JP5 144	240	03.01			Proposed definition on activity is too narrow. So this will influence the interpretation of the standard.	Change the proposed definition to current version, and read as; “process or set of processes undertaken by an organization (or on its behalf) that produces or supports one or more products and services EXAMPLE Such processes include accounts, call centre, IT, manufacture, distribution. [ISO 22301:2012, 3.1]	Not accepted
DE 002 145	240 – 243	03.01			Activity is broader than a task with a defined output and does not need to be defined	Delete definition as term can be used as a term of natural language	Not accepted
US 146	243	03.01		Ge	Don't think these are great examples and may cause confusion.	Delete example.	Accepted
PL 147	243	03.12 Example		ge	Too large font.	Decrease the font.	Superseded

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DE 003 148	244-262	03.13 audit		ge / ed	Although audits are one of the vital parts to ensuring viability of a BCMS, I don't think that that much additional information and notes are needed, especially compared to other terms. Additionally, every company should already have a basic understanding of what an audit is and how it functions, especially when that company already deals with BCMS.	Combine notes 2, 3 and 4, remove unnecessary information (e.g. 2 nd and 3 rd party audits). Delete notes 5 and 6.	Not accepted to combine 2, 3, 4 Accepted to delete 5 and 6
ZA 149	264	03.24		te	Consider adding a definition for business as it should be interpreted for this document. Some readers interpret business only as operations which lead to profit, i.e. economic activities. However, these guidelines will also be applicable to non-business entities.		Noted. No text provided
PL 150	266	03.24		ge	The term: "products or services" was better, not "products and services". Here and in further occurrences too. See also definition 3.181 (line 491)	Change "and" to "or" in definition of Business continuity.	Not accepted
DE 012 151	266-267	03.24 business continuity		ge	In my opinion this is a central term that is not yet well defined. Especially the amount of still delivered products and services and the "acceptable" time frames (what is acceptable?) should be defined further either here, or at a later point (if referenced accordingly).	Expand the definition regarding the aspects of "prioritized products and services" and "acceptable time frames".	Noted – no text provided
DE 013 152	267	03.24 business continuity		ge / ed	The term "disruptive incident" is not yet defined.	Add a definition.	Not accepted
PL 153	between 268 and 269	03.25		ge	Lack of definition of Business continuity management.	Business continuity management - holistic management process that identifies potential threats to an organization and the impacts to business operations those threats, if realized, might cause, and which provides a framework for building organizational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities	Not accepted Standalone term is not used
US	273	03.26		Ed	The cross reference to "resources (3.193)" is	Updated Section 3 Terms and definitions to include	Accepted to delete cross

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154					missing from Section 3 Terms and definitions	new 3.193 Resources	reference
SE 155	275	03.27		Te	<p>business continuity plan should be consistent with its business objectives</p> <p>planning should be described in a neutral way, this should be described in 22300.</p>	<p>Change 3.27 business continuity plan to documented information (3.72) that guides an organization (3.158) to respond to a disruptive incident (3.xxx)</p> <p>and resume, recover and restore the delivery of products and services consistent with its business objectives</p> <p>Change 3.170 planning to part of management (3.135) focused on setting business continuity objectives (3.153) and specifying necessary operational processes (3.180) and related resources (3.193) to fulfil the business objectives</p>	<p>Accepted with modification</p> <p>No change to 3.170 proposed</p>
AU 156	283	03.29		TE	<p>I believe we need to provide greater clarity regarding the concepts of RM and BC. We've been successful in the way we've managed Likelihood out of the BIA and I think we need to do the same with the term consequence.</p> <p>Impact and Consequence are often used interchangeably when in reality they are different terms.</p> <p>Consequence is a RM construct related to the outcome of a threat materialising eg consequence of a fire in the call centre is that staff may be injured or killed.</p> <p>Impact is a BC construct and relates to outcome of a business activity stopping eg Revenue will drop by 2% per day</p> <p>The definition of BIA should not include a RM term/construct</p>	<p>Replace with : "process (3.180) of analysing the ramifications of a disruptive incident (3.xxx)"</p> <p>Note: Based on the rules of substitution, I recommend the removal of the last part of the definition (ie "in the organization (3.58) ") because its already contained in the definition of disruptive incident</p>	Accepted with modification
AU 157	296	03.46		TE	Is this definition technically correct in the context of BC? Also refer to prev comment	Replace with "outcome of a threat being realised"	Superseded Matches 3100:2018

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DE 015 158	310	03.54 corrective action		ge / ed	I don't think that nonconformity is explained well enough.	Add one or more examples of possible nonconformities.	Withdrawn
AU 159	319	03.70		TE	Negative deviation may not translate well	Replace with "detrimental deviation"	Not accepted
DE 016 160	316 – 320	03.70			Either the term disruption or the term disruptive incident seems superfluous – consider deletion of either one	Delete definition As term disruptive incident seems to be more appropriate	Not accepted 'disruptive incident' deleted
161- 163					<i>Secretary's note: there are no comments for numbers 161-163</i>		
US 164	318	03.70		Ed	The term "event" should be replaced with "incident"	Amend to read: "incident [not defined currently in the standard] whether anticipated (e.g., labour strike or hurricane) or unanticipated (e.g. blackout or earthquake), that causes an unplanned, negative deviation from the expected delivery of products and services (3.181), according to an organization's (3.158) objectives (3.153)."	Accepted with modification [examples deleted]
DE 017 165	339	03.77			Adapt to deletion of 3.70	Change wording to: An emergency is usually a <i>disruptive event</i> (3.xxx) or a condition that can often . . .	Not accepted
US 166	340	03.77	Note 1 to entry	Ed	Clumsy use of English language.	Amend to read: "An emergency is usually a disruption (3.70) or condition that can often be anticipated or prepared for but the outcome unforeseen."	Not accepted
AU 167	346 7 352	03.82		GE	These seem to essentially be the same	Remove 352	Accepted
BR3 168	341	03.82	Terms and Definition	Te	In ISO 31000:2018 some notes was changed, consider to use this new definition	Use definition of "event" from ISO 31000:2018	Accepted
DE	341 – 353	03.82			Consider referring to the more recent definition in	Change lines 341 - 353 to:	Accepted

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018 169					ISO 31000	<p>3.82 event occurrence or change of a particular set of circumstances</p> <p>Note 1 to entry: an event can have one or more occurrences, and can have several causes and several <i>consequences</i> (3.46)</p> <p>Note 2 to entry: An event can also be something that is expected which does not happen, or something that is not expected which does happen.</p> <p>Note 3 to entry: An event can be a risk source</p>	
US 170	344 - 252	03.82	All Notes (1-8)	Te	<p>It is understood that Notes 1 – 4 have been pulled from the ISO/Guide 73:2009, 3.5.1.3 but as structured these notes are difficult to read, particularly with the addition of Notes 5 -8 (which make it all much more complicated than it needs to be).</p> <p>Would be better to group the notes logically and remove Note 7 which makes no sense.</p>	<p>Amend to read:</p> <p>“Note 1 to entry:</p> <p>a) An event can sometimes be referred to as an “incident” or “accident”.</p> <p>b) An event with a consequence is sometimes referred to as an “incident”.</p> <p>c) An event without consequences (3.46) may also be referred to as a “near miss” “incident” or “close call” [intentionally removed “near hit”]</p> <p>Note 2 to entry:</p> <p>a) An event can be one or more occurrences, and can have several causes.</p> <p>b) An event can consist of something not happening.</p> <p>[Intentionally did not include current Note 7 as it does not make sense as worded]</p> <p>Note 3 to entry:</p> <p>a) The nature, likelihood (3.133), and consequence of an event cannot be fully known.</p> <p>b) Likelihood associated with the event can be determined.”</p>	Superseded
US 171	346	03.82	Note 3 to entry	Te	If the outcome of an event is determined to be an incident Note 3 should be deleted.	Remove Note 3.	Superseded

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US 172	347 - 348	03.82	Note 4 to entry	Te	If the outcome of an event is determined to be an incident Note 3 should be deleted. Further, the term "near hit" does not make sense.	Remove Note 4. If WG2 determines not to remove the note, the term "near hit" should be removed.	Superseded
US 173	349	03.82	Note 5 to entry	Ed	Clumsy use of English language.	Amend to read: "The nature and likelihood (3.133), and consequence of an event cannot be fully known."	Superseded
US 174	351	03.82	Note 7 to entry	Ed	Note 1 is clear. This note is confusing.	Remove Note 7.	Superseded
DE 019 175	346 / 352	03.82 event		ed	Notes 3 and 8 are somewhat redundant.	Combine notes 3 and 8.	Superseded
PL 176	347	03.82 Note 4		ed	There is: "near hit. No second quote after word: hit.	Should be: "near hit"	Superseded
US 177	375	03.124	Example	Ed	People in an organization has been defined as "personnel" per Clause 3.169.	Amend to read: "Customers, owners (3.162), personnel (3.169), providers, bankers...."	Accepted
PL 178	376	03.124, Example		ed	At the end of sentence should be a full stop.	Customers, owners (3.162), people in an organization, providers, bankers, regulators, unions, partners or society that can include ompetitors or opposing pressure groups.	Accepted
PL 179	377	03.124, Note 1		ed	Lack of full stop on the end of this note (after word "party").	A decision maker can be an interested party.	Accepted
JTC1/ SC27 JP 10 180		03.124, 3.181	EXAMPLE	ed	Format of EXAMPLE is wrong. See 25.6 of ISO/IEC Directives, Par 2:2018.	Remove colon (:). Content should be complete sentence, start with capital letter and end with period.	Accepted
US 181	406 – 407	03.137	Note 1 to entry	Ed	Examples should be separated by a comma to denote there may be more examples than the three given.	Amend to read: "A management system can address a single discipline or several disciplines, e.g. quality management, financial management, environmental management."	Superseded – examples deleted
US	409	03.137	Note 2 to	Te	Rules and beliefs are not defined in the standard.	Remove reference to "...rules and beliefs....":	Accepted with modification. Reverted to Annex SL text

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182			entry				only.
FR7 183	411	3.137		te	The meaning of the term function is not clear enough. Does it refer to “process”? More generally, function is often used in this document (in lines 411, 438, 447, 539, 680), namely for definitions of important terms: in particular, the difference with the notion of process should be clarified.	Option 1: In line 411: Replace the term “function” by “process” (or another term with no ambiguities) Option 2: add a definition for the term function, specific to its use in the document.	Option 1: Not accepted Option 2: No text provided
US 184	440	03.158	NOTE 1	Ed	Note does not following correct naming convention.	Amend to read: “Note 1 to entry”	Accepted
US 185	441	03.158	NOTE 2	Ed	Note does not following correct naming convention.	Amend to read: “Note 2 to entry”	Accepted
US 186	449	03.160	NOTE	Ed	Note does not following correct naming convention.	Amend to read: “Note 1 to entry”	Accepted
DE 004 187	449-450	03.160 outsource		ge	I don't think that note is entirely true. There are numerous examples of companies influencing their supply chain partners heavily and even integrating them into a BCMS (or similar systems).	Add a note stating that companies should evaluate the amount of influence they have over their outsourcing partners and that they should determine whether it is possible and / or feasible to explicitly include those partners into the company's own BCMS.	Noted. No wording provided
US 188	461	03.168		Ed	Improve use of English language.	Amend to read: “process (3.180) to determine measurable results again set criteria.”	Accepted
PL 189	478	03.176 Note 1		ge	Why the word “terms”, “activities” since the definition is in the singular? To be consistent, a note better formulate in the singular.	Term commonly used to describe that activity includes: critical, essential, vital, urgent and key.	Superseded
DE 047 190	486	03	Terms and Definitions		The standard does not distinguish between management system processes and business processes (activity, process, business process)	There needs to be a clear separation between management system processes and business processes. The various process types should be included in the glossary. E.g. Management system process = activities to	Not accepted

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						describe the flow or procedure of a management system related process e.g. the process of the business impact analysis business processes = set of interrelated or interacting activities (3.1) that use inputs to deliver an intended result e.g. the business process of the creation of a product or service	
DE 005 191	486 – 488	03.180			Consider using the definition in HLS as the 9000 definition does not add value	Change lines 486 - 488 to: 3.180 process set of interrelated or interacting activities which transforms inputs into outputs	Accepted to use Annex SL text
DE 006 192	492	03.181			Shorten definition for clarity	Change wording to: outcome provided by an <i>organization</i> (3.158) to its customers, recipients and <i>interested parties</i> (3.124)	Accepted. 'Output or' is added
DE 007 193	494	03.181			Adapt to modification of line 492	Change wording to: ... 'beneficial' and 'its customers, recipients and' have been deleted]	Accepted
US 194	492	03.181		Ed	Unclear why customers are called out. Clause 3.124 includes customers in its definition of "interested parties". Unclear what constitutes a "recipient" if not an interested party.	Amend to read: "outcome provided by an organization (3.158) to its interested parties (3.124)."	Accepted with modification
PL 195	493	03.181 Example 1		ed	Too large font.	Decrease the font.	Accepted
JP6 196	496-498	03.182			Proposed definition is only focused on "reduction of the impact". But in practical not only "reduction" but also the concept of "prevention" is inevitable for protection.	Change as " to prevent or reduce the impact"	Accepted
US 197	503	03.187		Te	This definition of recovery is not sound and seems to include other differing words as synonyms (like "restoration"). Also, is livelihood and living conditions really the work of business continuity?	I don't have a recommendation per se but recommend that the participants in Norway consider a better definition.	Noted. No text provided
DE	512	03.190			Delete line as HLS text	Delete line	Accepted

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008 198							
US 199	508	03.190		Te	“Generally implied” is inconsistent with requirements setting.	Recommend deleting.	Not accepted Annex SL
DE 009 200	515	03.192 resilience		ge	The entire goal of a BCMS is to improve the resilience of a company, yet this term is defined in a very short and vague manner. This does not do justice to the whole concept of resilience as a holistic goal and means and basis of a BCMS.	Expand the definition, provide examples of resilient behaviour, link the concept of resilience to BCMS.	Noted. No text
DE 010 201	521 - 533	03.199			Consider referring to the more recent definition in ISO 31000	Change lines 521 - 533 to: 3.199 risk effect of uncertainties on <i>objectives</i> (3.153) Note 1 to entry: An effect is a deviation from the expected. It can be positive, negative or both, and can address, create or result in opportunities and threats. Note 2 to entry: Objectives can have different aspects and categories and can be applied at different levels. Note 3 to entry: Risk is usually expressed in terms of risk sources, potential events (3.82), their consequences (3.46 and their likelihood (3.133).	Partially accepted. Note 2 amended to match 31000:2018
BR4 202	521	03.199	Terms and Definition	Te	In ISO 31000:2018 some notes was changed, consider to use this new definition	Use definition of “risk” from ISO 31000:2018	Partially accepted. Note 2 amended to match 31000:2018
DE 011 203	534 – 541	03.203			Consider simply referring to clause 6.4 of ISO 31000 as the term has been deleted in ISO 31000 since a definition seemed inappropriate in view of a clause later explaining the term in detail	Change lines 534 - 541 to: 3.203 risk assessment overall process of <i>risk identification</i> (3.207), <i>risk analysis</i> (3.201) and <i>risk evaluation</i> (3.206) as described in ISO 31000:2018 clause 6.4 in detail.	Accepted with modification
US 204	537	03.203		Ed	Line 537 references “threats (3.259)” yet there is no “threats” or section 3.259.	Insert Section 3.259 “threat” (and appropriate definition) between Sections 3.257 and 3.263.	Superseded

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PL 205	544	03.208		ed	Too large font.	Decrease the font.	Accepted
DE 014 206	566 - 572	03.263			Consider using the definition in HLS as the 9000 definition does not add value	Delete lines	Accepted
US 207	566 – 567	03.263	Note 3	Ed	The note is unclear.	Amend to read: “For this purpose, an organization can be identified by reference to the scope of its management system.”	Superseded
ZA 208	588 - 601	04.01		ge	The general numbering in clause 4.1 is confusing.		Accepted.
Se 209	591	04.01		Te	The annex SL is enough move all other text to 22313. In this section there are three different terms of objectives, it is confusing	Use the same term throughout this section Change to overall objectives in line 596 and 601	Accepted
DE 022 210	591 - 592	04.01			Lines essentially repeat prior text (lines 589 – 590)	Delete lines	Accepted
NL 211	591	04.01			This sentence partly duplicates with and partly is in contradiction with the first bullet in 4.3.1 (line 620) that is mandatory Annex SL text. In 591 it is required that issues shall be <u>taken into account</u> and in line 620 it is required that issues shall be <u>considered</u> .	Delete the sentence in lines 591 and 592	Accepted
AU 212	594	04.01		TE	ISO TS 22317 states that Process definition is optional. In 22301.2 its couched as mandatory due to the directive 'shall' on line 589	Remove 'process' or replace with 'process (optional)'	Superseded
NL	595	04.01			Determination of the potential impact of a	Delete the following text:	Accepted – whole section

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213					disruptive incident is not part of understanding the organization and its context. This is part of conducting the BIA that is addressed in 8.2.2	and the potential impact following a disruptive incident	deleted
NL 214	596	04.01			The amount of risk the organization may take is a decision that should be made by the leadership of the organization. Therefore this requirement should be moved to clause 5 – Leadership The BC objectives are established in clause 6.2; at this point risk appetite should be related to BC goals.	5.2 Policy (..) Top management shall ensure that the amount and type of risk that the organization may or may not take, relative to its business continuity <u>goals</u> is identified and maintained as documented information.	Accepted
NL 215	598	04.01			This clause is titled 'understanding of the organization and its context'. The context shall not be established but shall be understood, to enable the organization to deal with all kinds of impact on the management system from the context.	Delete "In establishing the context"	Accepted
BR6 216	599	04.01		te	The idea of establishing a BCMS context should consider first the objectives definition once the business continuity is a result of a previous organizational structure.	The organization shall identify and document the following: a) articulate its overall objectives and evaluate products and services, processes, activities, resources, relationships with interested parties, and the potential impact following a disruptive incident; and b) the amount and type of risk that the organization may or may not take, relative to its business continuity objectives. In establishing the context, the organization shall: 1) articulate specific objectives concerned with business continuity; and 2) set risk criteria taking into account the organization's risk management framework, the BCMS scope and objectives, and the amount and	Superseded

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						type of risk that it may or may not take.	
US 217	591	04.01	2nd paragraph (and throughout Standard)	Ed	The following terms can be simplified throughout the Standard: “establishing, implementing and maintaining” Similarly the following can be simplified: 4.2.2 b) (row 613)	Amend to read: “... implementing and maintaining the”	Superseded
BR5 218	593 to 597 and 598 to 601	04.01	Paragraphs	Editorial	Requirements about what shall be identified, and document, should come after considerations to establish organizational context, to keep a logical sequence.	Move lines 598-601 before line 593.	Superseded
PT 219	594-595	04.01	a)	te	Document processes and activities can be very complex for some types of organizations and an effective BCMS can be implemented without the organization's processes documented. ISO 22317 states that: “Depending on its complexity, the organization may choose to omit process prioritization and proceed directly to activity prioritization. If the organization chooses to perform a process prioritization, the organization should determine activities that make up those processes.”	Change the requirement from: The organization shall identify and document the following: a) the organization's products and services, processes, activities, resources, relationships with interested parties, and the potential impact following a disruptive incident; To: The organization shall identify and document: a) the organization's critical products and services, processes and/or activities, resources, relationships with interested parties, and the potential impact following a disruptive incident;	Superseded
BR7 220	599	04.01	Paragraph	Te	The verb “to articulate” seems to be general and can cause difficulty in interpreting and applying the requirement : “articulate its overall objectives, including those concerned with business continuity”	To change the verb “to articulate” by a more specific verb, like: Define, Set, Understand, Consider	Superseded
AU 221	600-601	04.01		TE	I can't see where in 22301 we actually do this!	Remove and make line 598 and 599 flow as one sentence	Superseded
ZA	600	04.01.2		te	Is there a definition of setting risk criteria in 31000?		Superseded

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222							
NL 223	600	04.01			Risk criteria should be part of the organizations' policy	5.2 Policy (..) Top management shall ensure that risk criteria are set taking into account the organization's risk management framework, the BCMS scope and objectives, and the amount and type of risk that it may or may not take.	See NL214
US 224	606-607	04.02.1		Te	"Generally implied" is inconsistent with requirements setting.	Recommend deleting.	Accepted with modification – content in brackets deleted
NL 225	603	04.02.1		te	There is overlap between 4.2.1 and 4.2.2 because interested parties in 4.2.1 by definition include government and regulatory parties and therefore the requirements in 4.2.1 include legal and regulatory requirements. We propose to merge 4.2.1 and 4.2.2. Document should be documented information and 'maintain' implies it shall be kept up-to-date.	Change the text as follows: 4.2.1 General When establishing its BCMS, the organization shall determine: a) the interested parties that are relevant to the BCMS; b) the requirements of these interested parties (i.e. their needs and expectations whether stated, generally implied or obligatory), <u>including applicable legal and regulatory requirements..</u> 4.2.2 Legal and regulatory requirements b) The organizations shall ensure that these applicable legal, regulatory and other requirements are taken into account in establishing, implementing and maintaining its BCMS. ⇨ The organization shall maintain documented information about applicable legal, regulatory and other requirements document this information and keep it up-to-date.	Not accepted
BR8 226	606	04.02.1	Paragraph	Te	Not all stakeholder requirements are relevant to BCMS. It is therefore necessary to specify that the organization shall determine the relevant requirements of the BCMS	b) the requirements of these interested parties that are relevant to the BCMS	Not accepted

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BR9 227	606-607	04.02.1	Paragraph	Te	The text in parentheses could be replaced by a note after the item 4.2.1 b)	Include a Note: The requirements of interested parties can be their needs and expectations whether stated, generally implied or obligatory	Superseded
BR10 228	607	04.02.1	Paragraph	Te	Interested parties and its requirements can change and: <ol style="list-style-type: none"> 1. the organization shall take them into account when determining the BCMS; 2. The organization shall consider them when determining risks and opportunities; So it is important for the organization to monitor and review information about Interested parties and its requirements. This text is also a requirement of ISO 9001:2015	The organization shall monitor and review information on its interested parties and relevant requirements	Not accepted
SE 229	608	04.02		Te	The annex SL is enough move all other text to 22313. 4.2.2 is redundant	Move the entire section 4.2.2 Legal and regulatory requirements to 22313	Not accepted
BR11 230	608	04.02	Paragraph	Te	Line 608 content also refers to "interests of relevant interested parties" and contractual requirements	"Legal, regulatory and other requirements".	Not accepted
JP7 231	608-615	04.02.2	all	te	Requirements specified in 4.2.2 are covered by requirements described in 4.2.1	Delete 4.2.2	Not accepted
US 232	610	04.02.2	Sub-clause a) (and throughout Standard)	Ed	The following terms can be simplified throughout the Standard: "establish, implement and maintain" Similarly the following can be simplified: 4.4 first paragraph (row 610) 8.2.1 first paragraph (row 772) 8.4.2 first paragraph (row 855) 8.4.3 first paragraph (row 875) 9.2 2nd paragraph, 1st indent (row 968)	Amend to read: "implement and maintain a"	Accepted - See US 217
BR12	610	04.02.2 a)	Paragraph	Te	Other ISO Standards like ISO 9001 and ISO 14001 use the term "documented information" instead of	a) establish, implement and maintain a process(s) to identify, have access to, and assess the	Not accepted

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233					procedure or document. For this reason would be interesting to follow the same line of reasoning. This comment refers also to the subclause 4.2.2 c) and 8.4.5, line 924.	applicable legal and regulatory requirements related to the continuity of its products and services, processes, activities and resources, as well as the interests of relevant interested parties;	
BR13 234	615	04.02.2 c)	Paragraph	Te	Other ISO Standards like ISO 9001 and ISO 14001 use the term "documented information" instead of procedure or document. For this reason would be interesting to follow the same line of reasoning. This comment refers also to the subclause 4.2.2 a)	c) Retain documented information on this process and keep it up-to-date	Not accepted
AU 235	620	04.03.1		GE	There is an inconsistency in wording	Replace "issues" with "context"	Not accepted Annex SL text
BR14 236	621	04.03.1	Paragraph	Te	Add new item to support references in lines 769 and 797	Include after line 621 the text "- interfaces and dependencies between activities performed by the organization, and those that are performed by other organizations."	Not accepted
SE 237	623	04.03		Te	The annex SL is enough move all other text to 22313. 4.3.2 is redundant	Move the entire section 4.3.2 Scope of the BCMS to 22313	Not accepted
NL 238	623	04.03.2		te	<p>There is unnecessary and confusing overlap between 4.3.1 and 4.3.2. The two subclauses can easily be combined into one adding the BCM specific requirements to the generic Annex SL text (similar to what has been done in standards such as ISO 14001).</p> <p>In 4.3.2 'internal and external obligations' as well as 'interested parties needs' are already covered by 'the requirements referred to in 4.2' (second bullet in 4.3.1)</p>	<p>Change the text as follows:</p> <p>4.3.1 General</p> <p>The organization shall determine the boundaries and applicability of the BCMS to establish its scope. When determining this scope, the organization shall consider:</p> <ul style="list-style-type: none"> - the external and internal issues referred to in 4.1; - the requirements referred to in 4.2; - <u>its mission and goals.</u> <p>The scope of the BCMS shall:</p> <ul style="list-style-type: none"> - be defined in terms of be and appropriate to the organization's location(s), size, nature and complexity; 	Not accepted

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						<p>– identify the products and services, processes, activities and resources included in the BCMS. The scope shall be available as documented information.</p> <p>4.3.2 Scope of the BCMS The organization shall:</p> <p>a) consider its mission, goals, internal and external obligations; b) define the scope of the BCMS in terms of and appropriate to its location(s), size, nature and complexity; c) identify the products and services, processes, activities and resources to be included in the BCMS; and d) take into account interested parties' needs.</p> <p>When defining the scope, the organization shall document and explain exclusions; any such exclusions shall not affect the organization's ability and responsibility to provide business continuity, as determined by the business impact analysis or risk assessment and applicable legal or regulatory requirements.</p>	
JP8 239	627	04.03.2			Intention c) is to identify the products or services that are delivered to customer. Processes, activities and resources related to these products or services are secondary factors. Therefore these two elements are not put in the same category	Change following; c) identify the products or services with related processes, activities and resources	Accepted with modification
DE 045 240	627	04.03.2	Scope of the BCMS		The level of detail of the validity area is too high. e. g. „identify products and services and all related activities within the scope of the BCMS”	Sub-item C) should be formulated much softer: e.g. „consider products and services and all related activities within the scope of the BCMS”	Not accepted
ZA 241	626	04.03.2b		te	Review the sentence	define the scope of the BCMS in terms of its appropriateness to its, nature, complexity, size and location(s)	Not accepted
US	630-631	04.03.2		Ge	Shouldn't this clause be focused on BCMS level	Recommend deleting all words after the words	Not accepted

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242					objectives rather than requirements to continue or recovery processes, activities and resources, which is what the BIA and risk assessment does?	"business continuity,".	
ZA 243	632, 633, 634	04.04		te	Is this not repeating what is in the scope? This should be at the beginning of the Clause 4 as an introduction. Suggest we move this to beginning as an intro to the clause.		Not accepted
CA 244		04.04			Correct ISO 22301:2012. Actually, unless the ISO editors will change them, all such references should be corrected.	Correct ISO 22301:2012.	Not related to 22301
SE 245	638, 639	05.01		TE	This standard is about business continuity It does not have to be repeated in every sentence	Change to ensuring that the business continuity policy and objectives are established and are compatible with the strategic direction of the organization	Not accepted
BR15 246	638	05.01		Te	The word ensuring is intrinsic to the top management team obligations and says little about the way to achieving the main objectives regarding to the BCMS.	— establishing the business continuity policy and business continuity objectives compatible with the strategic direction of the organization; ISO/CD 22301.2 13 640 — integrating the BCMS requirements into the organization's business processes; — making resources available for the BCMS needs; — communicating the importance of effective business continuity and conforming to the BCMS requirements; — Feasible defining and monitoring BCMS intended outcome(s);	Not accepted Annex SL
US 247	641	05.01 and 7.2		Te	The 2012 version had a requirement for leadership to appoint persons with appropriate authority and competence to be accountable for the	After 641 (- third bullet) or 646 after 7 th bullet. - assigning accountability for the implementation and	Not accepted – see 5.3

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					implementation and maintenance of the BCMS. Responsibility and authority was moved to 5.3 and competence to 7.2 but is it clear leadership needs to ensure that those assigned are accountable?	maintenance of the BCMS. Note the difficulty in referencing the bullets....	
JP9 248	642	05.01	Bullet 4	ed	Consistent with HLS HLS says that “ – communicating the important of effective XXX management and”	“XXX” in HLS is replaced by “business continuity” and read as: - communicating the importance of effective business continuity management and of conforming to the BCMS requirements.	Not accepted Annex SL – WG2 decision not to include the term “business continuity management”
ZA 249	649	05.01		te	Consider adding the following to the note:	... activities that are core to the purposes of the organization's existence and is equally applicable for profitable business operations and non-business, non-profit operations.	Not accepted
COL 250	657-660	5.2		TE	Why was the bullet about reviewing the policy at defined intervals removed? It is included in clause 9.3.1 and in letter c), clause 7.5.2	Add the bullet back into the list	Not accepted
US 251	657-660	05.02 2012 version 5.3 The BCMS policy shall...		Te	Why was the bullet about reviewing the policy at defined intervals removed?	Add the bullet back into the list.	Not accepted
BR16 252	654	05.02	Paragraph	Te	Improve business security policy robustness	Update line 654 to "includes business continuity objectives (see 6.2) or provides a framework for setting business continuity objectives;"	Not accepted
DE 041 253	656	05.02	Policy		The standard system often refers to "Documented Information". References to relevant regulations to be included in a policy are missing.	In the standard there should be a reference added at appropriate points e.g. legal and regulatory requirements	Not accepted
DE 042 254	After 656	05.02	Policy		The policy does not consider an overview of the main elements of the BCMS.	There should be included another sub-item, which states that the policy has to include a short description of the main elements of the Management System. E.g. e.) describes the main elements of the BCMS	Not accepted

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						Such as “BCM Governacne, Business Impact Analysis, Emergecy Conception”	
DE 039 255	661	05.03	Organization al roles, responsibilitie s and authorities		There is no requirement that states the responsibility for the operational implementation of the BCMS. Futhermore the BCMS has to be consistent to the strategy of the top management.	There should be another sub-item included, which describes another responsibility: E.g. c.) implementing the BCMS and ensuring compliance with the strategy of the top management.	Not accepted
BR17 256	662	05.03	Paragraph	Te	Explicitly state that responsibilities and authorities refer to business continuity	Update line 662 to "Top management shall ensure that the responsibilities and authorities for relevant roles to business continuity are assigned and"	Not accepted
BR18 257	666	05.03	Paragraph	Te	Include information about reporting BCMS performance	Consider the following note after line 666: "Top management may also assign responsibilities and authorities for reporting performance of the business continuity management system within the organization."	Not accepted
FR8 258	668	6.1		te	Risk “Risk and oppourtunities” is not correct with regard to ISO 31000. Threats and opportunities are the both sides of Risk.	Modify as follows: “6.1 Actions to address risks” or “6.1 Actions to address risks (threats and opportunities)”	Not accepted Annex SL
BR19 259	668	06.01	Title	Te	Inadequate use of opportunity as an opposite of risk. The correct would be threats and opportunities, both are considered risks depending on the respectively negative or positive effects on objectives	6.1 Actions to address risks Remove “and opportunities” or 6.1 Actions to address threats and opportunities	Not accepted Annex SL
FR9 260	668	6.1		te	We understand that, according to the HLS, Based on HLS, the following questioned was raised: if the chapter “6. Planning 6.1 Actions to address risks and oppourtunities” should describe the following items : “the organization shall (...) determine the risks and oppourtunities that need to be addressed (...) (and) plan actions to address these risks and	Opened question to WG2 regarding the position of these items (consistency of the current document organization with HLS). If not consistent, then Transfer § 8.2 (line 770) inside 6.1 as § 6.1.1 (between lines 678 and 679) Transfer § 8.3 (line 808) inside 6.1 as § 6.1.2 (between § 6.1.1 and line 679)	Not accepted Section 6 is focused on the BCMS while section 8 is about BC – see NL004

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					opportunities (...).” The present § 8.2 is about determining risks and opportunities and § 8.3 about the actions to address these risks (named solutions).		
BR20 261	670	6.1	paragraph	Te	Inadequate use of opportunity as an opposite of risk. The correct would be threats and opportunities, both are considered risks depending on the respectively negative or positive effects on objectives	“... and determine the risks that need to be addressed...” or “... and determine the threats and opportunities that need to be addressed...”	Not accepted Annex SL
BR21 262	675	06.01	paragraph	Te	Inadequate use of opportunity as an opposite of risk. The correct would be threats and opportunities, both are considered risks depending on the respectively negative or positive effects on objectives	“... to address these risks.” or “... to address these threats and opportunities.”	Not accepted Annex SL
AU 263	680	06.02		TE	What is a function and level?	Replace “at relevant functions and levels.” with “at various parts of the Organisation structure”	Not accepted Annex SL
SE 264	682	06.02		Te	It is important that planning is based on the overall objectives of the organization.	Add a bullet The business continuity objectives shall: a) be consistent with the overall objectives of the organisation b) be consistent with the business continuity policy; c) be measurable (if practicable); d) take into account applicable requirements; e) be monitored; f) be communicated; and g) be updated as appropriate.	Not accepted Already address via section 5.2 a) which links to 6.2 a)

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US 265	682	06.02	Paragraph 2, sub-clause b)	Ed	The existing clause has been deleted. I believe this is in error.	Reinstate existing clause 6.2 b) to read: "b) take account of the minimum level of products and services that is acceptable to the organization to achieve its objectives."	Not accepted
PL 266	689	06.02.f		ed	After words: "shall determine" should be a colon.	When planning how to achieve its business continuity objectives, the organization shall determine:	Accepted
AU 267	691	06.02		GE	There is an inconsistency in wording	Replace "resource' with 'support (see 7)'	Not accepted
SE 268	695	06.03		Te	This should be described in section 10	Move to section 10	Not accepted. Cross reference added Consider for ISO 22313
DE 023 269	695 – 702	06.03			This section would better be placed in clause 10.2	Move lines to follow line 1038	Not accepted. Cross reference added Consider for ISO 22313
NL 270	695-702	06.03		te	We do not see the need for or added value of this new subclause. Changes to the BCMS can be the result of management review, corrective action and par of the continual improvement processes. There is no need to detail requirements for the way in which such changes are implemented.	Delete 6.3	Not accepted. Cross reference added Consider for ISO 22313
ZA 271	696, 697	06.03		te	What does this mean? "Planned manner"		Noted
AU 272	705-706	07.01		TE	Needs to be consistent with other simplifications	Replace "for the establishment, implementation, maintenance and continual improvement of" to "to implement and maintain"	Not accepted Annex SL
US 273	705 - 706	07.01	1st paragraph (and throughout Standard)	Ed	The following terms can be simplified throughout the Standard: "establishment, implementation and maintenance"	Amend to read: "The organization shall determine and provide the resources needed to implement, maintain and continually improve the BCMS."	Not accepted Annex SL

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CA 274		07.01.2 1			Correct formatting of unordered list 7.4 last sentence - 'an incident' or 'a disruptive incident'	Correct formatting of unordered list 7.4	Not for ISO 22301
US 275	709 - 710	07.02	1st paragraph, sub-clause a)	Ed	"...business continuity..." is not defined in Annex SL. Text should be black.	Amend to read: "...business continuity..." in black text.	Not accepted In Annex SL it is XXX. XXX is replaced by the discipline specific text
UK 276	709	07.02	a)	te	The change to refer to 'business continuity performance' is an improvement on the previously unspecified performance, however it would be better to refer to the 'performance of its BCMS' which is broader and includes business continuity performance	Change to: a) determine the necessary competence of person(s) doing work under its control that affects the performance of its BCMS	Not accepted Annex SL
UK 277	711	07.02	b)	te	This appears to have been changed to comply with the wording of 'ISO IEC Directives Part 1 and Consolidated ISO Supplement - 2017 (8th edition). However, the standard text is incorrect. The change of 'and' to 'or' means that persons only need to demonstrate competence in one of the categories 'education', 'training' or 'experience'. If for a particular competence one of them is not required, the appropriate competence from that element would be nothing but the required competence will still be achieved by summing all three If the word 'appropriate' were to be omitted, the change might be correct The change from 'and' to 'or', should be reversed.	Change back to: b) ensure that these persons are competent on the basis of appropriate education, training and experience	Not accepted Annex SL
JP10 278	715	07.02	NOTE	ed	Consistent with HLS HLS says that "NOTE Applicable actions can include,"	Modified as "Applicable actions can include, ..."	Accepted
ZA 279	718	07.03		te	Need to rephrase this to an aspect that the organisation can demonstrate implementation. The current sentence puts the assessment on the person; an aspect the organisation has no control	The organization shall determine how persons doing work under the organization's control shall be made aware of	Not accepted

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					over		
US 280	720 - 721	07.03	1st paragraph, sub-clause b)	Ed	"...business continuity..." is not defined in Annex SL. Text should be black.	Amend to read: "...business continuity..." in black text.	Not accepted In Annex SL it is XXX. XXX is replaced by the discipline specific text
TH 281	724-729	07.04		ed	For the complete elements of communication process to be applied to 8.4.2 and 8.4.3, the item "e) who will communicate;" should be added.		Accepted
BR22 282	729	07.04	Paragraph	Te	Improve robustness of BCMS communications	Include after line 729 "e) the processes by which communication shall be effected."	Not accepted
US 283	725	07.04	1st paragraph	Ed	Missing a colon at the end of the sentence.	Amend to read: "The organization shall determine the internal and external communications relevant to the BCMS including:"	Accepted
ZA 284	730	07.05.1		ge	Should we be not be referring to an ISO 9001 "documented information" clause instead of rewriting this?		Not accepted Annex SL
US 285	732	07.05.1	1st paragraph	Ed	Missing a colon at the end of the sentence.	Amend to read: "The organization's BCMS shall include:"	Accepted
PL 286	732	07.05.1		ed	To be consistent after words: "shall include" should be a colon.	The organization's BCMS shall include:	Accepted
ZA 287	736 – 739	07.05.1		te	Delete these as they contradict what the document calls 'requirements'	Delete	Not accepted Annex SL
JP11 288	737	07.05.1	Bullet 3 Note	te	Consistent with HLS HLS says that "- the size of organization and its type of activities, processes, products and	- the size of organization and its type of activities, processes, products and services.	Not accepted Resources added for consistency

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					services.” We don't think that the change of order of words from HLS bear significant meaning		
DE 289	737	07.05.01			Unclear what value is added by the rearrangement of the words of the HLS – it is preferable to remain with HLS wording to avoid confusion	Change wording to: . . . organization and its type of activities, processes, products and services;	Withdrawn
COL 290	739	7.5.1		Te	It is not clear what competence of persons means and how it affects the information must be documented. It can be inferred that if people are not competence, they don't have to document the information	Delete bullet	Not accepted Annex SL
US 291	739	07.05.1		Te	Note: What does competence of persons mean and how does this impact how BCMS information should be documented? Does this mean that if your people are not competent then you don't have to document the BCMS information? Or if BCMS personnel are really competent then they have to do a better job?	Remove bullet or get information from ISO as to what this means and add a note.	Not accepted Annex SL
DE 025 292	740	07.05.02 creating and updating		ge	I think that the possible need to access external documents should be included.	Add that a company shall evaluate whether it has access to external documents in times of need and if not, should take action to ensure accessibility as much as possible and / or feasible.	Not accepted Consider for ISO 22313
AU 293	743	07.05.2		ED	Punctuation	; and	Not accepted
PL 294	753	07.05.3, b		ed	To be consistent after bracket: should be a semicolon not comma.	— control of changes (e.g. version control);	Accepted
US 295	753	07.05.3	2nd paragraph, 3rd sub-bullet	Ed	Missing a semicolon at the end of the sentence.	Amend to read: “- control of changes (e.g. version control);”	Accepted
PL 296	758	07.05.3 Note		ed	At the end of this sentence (Note) should be a full stop.	Access implies a decision regarding the permission to view the documented information only, or the permission and authority to view and change the documented information.	Accepted

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SE 297	759	08		Ge	the guidelines and requirements set out in the 22316, 22317, 22318 and 22331 must be reflected in section 8. For example, 22331 contains a GAP analysis but it is not found in this document	Ensure harmonization with other documents in the BCMS series. Add under section 8.3.1 Identification and selection of solutions shall be based on output from the risk assessment, business impact analysis and <u>gap analysis</u> , taking into consideration their associated costs.	Not accepted <i>Consider for ISO 22313</i>
US 298	761	08.01		Ge	Replace “requirements” with language consistent with that elsewhere in the standard.	Replace with “its business continuity requirements”	Not accepted Annex SL
ZA 299	761	08.01		te	Line 761 should be split.	The organization shall plan, implement and control the processes needed to meet requirements by: a) implement the actions determined in 6.1, b) establishing criteria for the processes; c) implementing control of the processes in accordance with the criteria; and d) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.	Not accepted Annex SL
JP12 300	762	08.01	Para 1	te	Items to be carried out in 8.1 are not only items in 6.1 but also all requirements specified in Clause 6.	Change 6.1 to Clause 6 and read as; ..., and to implement the actions determined in Clause 6 by:	Not accepted Annex SL
US 301	763	08.01		Ge	To me, it's unclear what “establishing criteria for the processes” mean?	Recommend replacing with something clear in terms of outcomes.	Noted - No text provided Annex SL
ZA 302	767	08.01		te	What does this sentence mean?	Revise	Noted - No text provided Annex SL
ZA 303	769	08.01			Meaning?		Noted - No text provided Annex SL
CA 304		08.01.1 2			Why the change of 'risk assessment (RA)' to 'risk management', when the title is '2) Business impact analysis and risk assessment'?	Use risk assessment	Not accepted Not related to 22301

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CA 305		08.01.2 3			As in 8.1.1 2), why the change of 'risk assessment (RA)' to 'risk management'	Use risk assessment	Not accepted Not related to 22301
JP13 306	770	08.02			Title of this clause is changed from "Business impact analysis and risk assessment" to "Business impact analysis, and managing risk". This change has serious influence on interpretation and implementation of BCMS based on this standard, and also it is not auditable. "Managing risk" is to rise the level of the requirement and would be hard burden to SMEs, and furthermore not auditable.	Change managing risk to risk assessment and Change the title to its original ones and read as; "Business impact analysis, and risk assessment"	Accepted
AU 307	770	08.02		ED	Punctuation	Remove comma	Accepted
NL 308	770	08.02		te	Why are the words 'managing risk' added to the title and applied in line 773 and from 8.2.3 onwards we use Risk Assessment again?	Change title of 8.2 to: 8.2 Business impact analysis and risk assessment Change in 773: "managing risk" into "risk assessment"	Accepted Accepted with modification
DE 026 309	770	08.02	All	ge	Contents contains aspects of the planning stage and should be addressed in clause 6, similar to ISO 27001. With regard to implementation of Integrated Management Systems a similar structure to ISO 27001 is recommended.	Transfer clause 8.2 to 6	Not accepted
UK 310	770	08.02	Heading	te	My understanding is that it was agreed that the standard should as far possible use plain English and that the expression 'management of risk' was to be used instead of risk assessment Use of the term business impact analysis, which is widely misunderstood, should also be avoided	Change heading to read: 'Analysis of business impacts and management of risk'	Not accepted
FR10	770	8.2		te	BIA is not beside, but inside risk assessment (RA).	Modify 8.2 "Business impact analysis, and managing risk" as follows: "8.2 Risk assessment	Not accepted

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311					RA encompasses BIA. Risk assessment is, by definition, according to ISO 31000, the process of risks identification, analysis and evaluation. BIA is the part of that process which analyses the consequences (impacts) of possible disruptive events and determines what is tolerable (MTPD...) and how to obtain it through prioritized activities. The rest of the RA is determining disruptive events and establishing a matrix showing these risks and whether they are acceptable or critical, before and after possible treatment.	with development of a Business impact analysis” In the 1 st § of 8.2.1 General, replace “a process for Business impact analysis, and managing risk” by: “a process for risk assessment including Business impact analysis” Transfer “8.2.3 Risk assessment” to “8.2.2” At the end of new “8.2.2 Risk assessment”, add: “d) establish a risk matrix using the identified and evaluated risks of disrupting events” Transfer “8.2.2 Business impact analysis” to “8.2.3” At the beginning of the new 8.2.3, add: “During the risk analysis and the risk evaluation...”	Not accepted Not accepted Not accepted Not accepted Not accepted
FR11 312	770	8.2		te	TC 262 risk management should be consulted on the risk aspects of this document (relationship between Risk management and BCMS, meaning and wording of the § about risk) in order to harmonize the ISO documents.	In any case, it would be useful to consult TC 262 risk management on this § 6.1 and 8.2	Noted
AU 313	772	08.02.1		TE	Needs to be consistent with other simplifications	Remove “establish”	Accepted
UK 314	772	08.02.1	Opening paragraph	te	Plain English should be used to ensure that the overarching message of this clause is clearly stated	Change opening paragraph to read as follows: ‘The organization shall implement and maintain a process for analysing business impacts and managing risk that.’	Accepted with modification
US 315	773	08.02.1		Te	The words “managing risk” are too generic and even though resident in a BCMS standard, we probably need to be more specific.	Change to “managing the risk associated with disruptive incidents”	Not accepted
JP15 316	774	08.02.1	a)	ed	Proposed draft is drastically changed the intention of requirement. Furthermore, we can not understand the reason why the change from “of” to “following”	Change “impact following ...”to “impact of.....” and read as a) establishes the context of the assessment, defines criteria and evaluates the potential impact of a disruptive incident;	Accepted
UK 317	774	08.02.1	First sub- clause	te	changing the word 'of' to 'following' changes the meaning of this requirement and is misleading	Because this is a general introduction and to avoid repetition later, it would be better to phrase this	Not accepted

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					because it alludes to responding to a specific incident rather than analysis of the potential impacts of non-specific, generic incidents	sub-clause as follows: 'a) establishes the context of the assessment, defines criteria and evaluates the potential impact of activities being disrupted'	
US 318	774	08.02.1		Te	BIA and risk assessment are two different but related processes.	Make sixth word in this line plural.	Superseded, word deleted
US 319	776	08.02.1		Te	Is this needed since legal and regulatory requirements are taken into account in the design of the BCMS, which includes sub-process design.	Delete for simplicity	Accepted
US 320	777	08.02.1		Ed		Add the word "add" between analysis and prioritization	Superseded
AU 321	777	07.02.1		ED	Punctuation	; and	Superseded
BR23 322	777	08.02.1 c)	Paragraph	Te	Consider clear the text	c) includes systematic analysis and prioritization of risk treatments	Superseded
US 323	777	08.02.1	1st paragraph, sub-bullet c)	Ed	Missing word.	Amend to read: "includes systematic analysis and prioritization of risk treatments."	Superseded
JP14 324	777	08.02.1	c)		Risk treatment is not included in risk assessment. Requirement in current draft is beyond the current requirement. Intention of this bullet is to prioritize the risk to be treated	Change as; c) includes systematic analysis, prioritization of risk for treatments;	Superseded
AU 325	779-780	08.02.1		TE	The NOTE adds no value	Remove	Not accepted – wording changed
ZA 326	779	08.02.1		te	Delete the last part of this sentence as it is confusing	There are various methodologies for business impact analysis and risk assessment	Not accepted – wording changed
UK 327	779	08.02.1	Note	te	With the change from 'risk assessment' to 'management of risk', this note is no longer necessary	Remove note	Not accepted – wording changed
COL 328	781	8.2.2		ge	¿What is the link between this standard to ISO 22317?	Make Links ISO 22317 within an ISO 22301. For example, in a NOTE in clause 8.2.2:	Not accepted

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						NOTE: For guidance in BIA see ISO/TS 22317	
DE 028 329	781-798 / 923-925	08.02.02 business impact analysis / 8.4.5 recovery		ge / ed	In addition to actions regarding the prioritized activities I think that recovery actions / steps for non-prioritized activities should also be included, as some processes require significant ramp-up-time and therefor should be taken into account as early as is possible.	Expand the mentioned activities to recovery steps for resuming the entirety of business operations, especially if some processes require a lot a ramp-up-time. Add specific examples, if possible.	Not accepted
UK 330	782	08.02.2	Opening paragraph	te	The most important requirement of this clause is that continuity and recovery priorities should be based on analysis of impacts, so this should be stated clearly and unequivocally	Change opening paragraph to read as follows: 'The organization shall implement and maintain a process for determining continuity and recovery priorities based on analysis of business impacts. The process shall.' Change opening words of the sub-clauses that follow in order to ensure correct English	Not accepted
UK 331	782	08.02.2		Te	Why do we say "business continuity and recovery priorities"? Why recovery? In what way are these different priorities?	Change to "business continuity priorities"	Accepted with modification
US 332	782	08.02.2	1st paragraph	Ed	Recovery priorities are not used elsewhere in the Standard.	Amend to read: "The organization shall implement and maintain a process for determining business continuity requirements that:"	Not accepted
US 333	782	08.02.2		Ed	To be consistent with the rest of the document, recommend changing "and recovery priorities".	Change "and recovery priorities" to "requirements"	Partially accepted
UK 334	784-789	08.02.2	List	Te	Isn't the order of this wrong? Surely you identify the activities that support products and services before analysing the impacts of disruption of those activities?	Change order to a,b,d,c,e	Accepted
US 335	784	08.02.2	1st paragraph, sub-bullet a)	Te	Impact categories have not been defined in the Standard.	WG2 need to define what is meant by "impact categories" and add to Section 3 Terms and definition. Examples may include: Financial, operational, regulatory, reputation	Not accepted
US 336	786	08.02.2	1st paragraph, sub-bullet c)	Te	The statement is incorrect.	Amend to read: "c) analyses the impacts over time to justify business continuity requirements."	Not accepted

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DE 337	786	08.02.2			Remain with prior definitions: »disruption of activities« might be confusing in view of the defined term »disruptive incidents«	Change wording to: ... time resulting from disruptive incidents;	Accepted with modification
US 338	786 – 787	08.02.2		Ge	I think the order of these bullets is important to ease reading and adoption.	Recommend flipping C and D, and also add “processes, activities, and resources” as a replacement for just the word “activities”	Accepted Not accepted
AU 339	786-787	08.02.2		TE	The sequence is incorrect and not reflective of ISO TS22317	Swap position of point c) and d)	Accepted
US 340	787	08.02.2	1st paragraph, sub-bullet d)	Ed	Missing new standard wording.	Amend to read: “d) identifies processes, activities and resources that support the provision of products and services;”	Not accepted
DE 037 341	788	08.02.1	Business impact analysis, and managing risk		There is no reference on how to deal with providers/suppliers.	There should be included another sub-item which first of all states the importance on evaluating providers/suppliers and of course the reference to ISO 22318. E.g. e) consider the identification, evaluation and measurement on providers or suppliers. See ISO22318.	Not accepted
US 342	788	08.02.2		Te	Because of the note on Line 290 that Lines 788-789 are meant to describe MTPD, is the word “acceptable” correct?	Recommend considering changing “unacceptable” to something implying “threatening the viability”.	Not accepted
US 343	788 - 792	08.02.2	1st paragraph, sub-bullet e) and f)	Te	As worded, the two sub-clauses e) and f) continue to be ambiguous. An auditor may expect the organization to present two different timeframes because f) sets prioritized timeframes within the identified time for resuming disrupted activities identified in e). Multiple ISO 22301 auditors currently interpret (and will continue to do so) the need for two different timeframes: 1) Maximum tolerable period of disruption (as defined in the note to sub-clause e) and 2) Recovery time objective (as defined in sub-clause 8.2.2 f))	Amend to read: Remove e) in its entirety “f) sets prioritized timeframes for resuming disrupted activities at a specified minimum acceptable capacity;”	Not accepted Accepted with modification

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COL 344	790	8.2.2		Ed/te	The MTPD concept is not mentioned in the ISO22301:2012 standard until a slight note on this section of BIA. It is an important limit that measures the performance of the BCMS, when the activation of plans is needed, I suggest it should be better explained in order to make it more useable.	Add to the note: "One MTPD measure should be defined for the organization as a whole, and also could be determined by each organizational unit or major area of activities. MTPD are usually aligned with the Risk Appetite and financial or operational impacts as consequence of disruption, which are analyzed by the Top Management."	Not accepted Consider for ISO 22313
PL 345	790	08.02.2.e Notes		ge	This note refers to MTPD, but in this document there is no such definition of MTPD.	Add definition of MTPD.	Not accepted
US 346	790	08.02.2	1st paragraph, sub-bullet e), NOTE	Te	So long as an organization determines the timeframe within which it must recover a business process, there should be no need to have two values. The elimination of the note in Clause 8.2.2 e), will eliminate the requirement for two values and any ambiguity that might result from an audit.	Remove NOTE in its entirety.	Not accepted
JTC1/ SC27 JP 12 347		08.02.2	NOTEs	ed	There are 3 NOTEs without numbers in 8.2.2. See 24.3 of ISO/IEC Directives, part 2:2018.	Put numbers to NOTEs.	Not accepted. Each note is separate.
BR24 348	793	08.02.2	Paragraph	Te	I understand that the concept of recovery point objective (RPO) should be included here, because to recover 100% of a situation before a disruption is costly, and an organization should define how much data loss, or other previous conditions is acceptable considering the RTO.	g) sets the maximum targeted period in which data might be lost; NOTE This may be referred to as recovery point objective (RPO)	Not Accepted
PL 349	793	08.02.2.f Note		ge	This note refers to RTO, but in this document there is no such definition of RTO. After sentence should be a fullstop.	Add definition of RTO. This may be referred to as recovery time objective (RTO).	Not accepted

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US 350	793	08.02.2	1st paragraph, sub-bullet f), NOTE	Te	So long as an organization determines the timeframe within which it must recover a business process, there should be no need to have two values. The elimination of the note in Clause 8.2.2 f), will eliminate the requirement for two values and any ambiguity that might result from an audit.	Remove NOTE in its entirety.	Not accepted
PT 351	794	08.02.2		te	Add reference to top management endorsement for business continuity and recovery priorities.	Add requirement: g) seeks endorsement from top management.	Not accepted
UK 352	794	08.02.2	g)	te	Sub-clause g) includes the phrase 'uses the outcome of the business impact analysis to'. The exact meaning of this is not clear, so it creates ambiguity and uncertainty. The phrase is unnecessary and can be dropped There is much confusion and many differing views in the BC community as to the meaning of 'business impact analysis' and the definition in ISO 22300 is incomplete and unhelpful. It would therefore be better to eliminate the term from the standard altogether in much the same way as the term 'business continuity management' has been removed Definition of business impact analysis in ISO 22300: 'process of analyzing activities and the effect that a business disruption might have upon them' (see also comment above regarding opening paragraph change to include reference to 'analysis of business impacts')	Remove the words 'uses the outcome of the business impact analysis to' and change the sub-clause to read as follows: g) identifies activities to which priority must be given following an incident in order to mitigate impacts (prioritized activities)	Accepted with modification
FR12 353	794	8.2.2		te	This sentence that gives a definition of prioritize activities needs to be rephrased to be clearer and emphasize the priority aspect	New proposition for the sentence: "g) uses the outcome of the business impact analysis to identify prioritized activities, namely activities to which priority must be given following an incident in order to mitigate impacts"	Not accepted

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JTC1/ SC27 JP 11 354		08.02.2	g)	ed	"must" is used which is prohibited. See Table 3 of ISO/IEC Directives, Part 2:2018.	Change to "shall" for requirement or to "should" for recommendation.	Superseded
UK 355	796	08.02.2	h	Te	Its not just the quantity of resources but which resources that are needed and when.	Change to "determines the type and quantity of resources needed to support prioritized activities and in what timeframes"	Superseded
US 356	796	08.02.2	h)	Te	The text inserted reads "h) determines the quantity of resources needed to support prioritized activities;"	Propose the insertion of "type": h) determines the type and quantity of resources needed to support prioritized activities;	Superseded
FR13 357	796	8.2.2		te	BIA helps to determine the type of resources that is going to be needed to support prioritized activities (not only the quantity).	"h) determines the quantity of resources needed to support prioritized activities;"	Superseded
FR14 358	797	8.2.2		te	The aspects of dependencies and interdependencies should be better mentioned and earlier, as it directly linked to activities identification	Replace "i) determines the dependencies and interdependencies of prioritized activities" by: "h) determines the dependencies and interdependencies between prioritized activities"	Not accepted
US 359	798	08.02.2		Ge	Given the reference to ISO 22318 and later references to ISO 31000 as a means of recommending process (TS and Guidance), we should mention ISO 22317	Add a second note with the following: "The business impact analysis process could be made in accordance with ISO 22317."	Not accepted
FR1 360	798	8.2.2		te	BIA helps to determine the key resources for the prioritized activities.	Add: "j) determines the critical resources of prioritized activities	Not accepted
SE 361	799	08.02.3		Te	Describe the risk requirements in the same section as in 9001	Move all requirements to 6.1. and explain the differences in 22313.	Not accepted
AU 362	799	08.02.3		TE	Should not be Risk Management, it's the management of risk since RM is broader than operational Risk and BCM.	Change heading to: Management of risk	Not accepted
TH 363	799-801	08.02.3		ed	To be consistent with 8.2, the statement should be changed as follows: "8.2.3 Managing risk		Not accepted

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					The organization shall implement and maintain a process for managing risk that ...”		
UK 364	799	08.02.3	Heading and opening paragraph	te	My understanding is that it was agreed that the expression 'management of risk' was to be used instead of risk assessment, so title and opening paragraph should reflect this	As per previous comments, change heading to: 'Management of risk' and opening paragraph to: 'The organization shall establish, implement, and maintain a process for management of risk that systematically identifies, analyses, and evaluates the risk of disruptive incidents to the organization	Not accepted
AU 365	801	08.02.3		TE	The focus is incorrect. Its not about assessing the risk of disruptive incidents, it is the risk of disrupting the organisation's prioritised activities.	Replace “of disruptive incidents to the organisation.” with “of disrupting prioritized activities.”	Accepted with modification
US 366	800-801	08.02.3		Te	A number of users of ISO 22301 asked for the project team to consider, as part of the risk assessment process description, to work to assess the vulnerability of being unable to recover in a timely manner as part of this effort, as well as to insert language about assessing the frequency of disruption due to resource-level single points of failure. In total, these two topics might help focus the risk assessment outcomes.	The recommendation is to discuss this point in Norway as a means of working to eliminate confusion on the broader risk assessment across disciplines.	Noted. Consider for ISO 22313
US 367	802	08.02.3	NOTE	Ed	This is a note stating: “This process could be made in accordance with ISO 31000”. I see the benefit of linking, but should this not be in the guidance document rather than the requirements? We don't link to other guidance documents in this same manner. It feels out of place.	Remove and consider insertion in 22313.	Not accepted
DE 030 368	803	08.03	All	ge	BC Strategies are similar to risk treatment measures of the ISO 27001. May this could be addressed in clause 6 of ISO 22301.	Transfer clause 8.3 to 6	Not accepted
FR16 369	804-807	8.2.3		te	Some modifications/precisions can be made to clarify the method.	1 - Rephrase a) as follows: “a) Identify risk scenarios with potential causes resulting in unavailability on prioritized activities and resources.”	Not accepted

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						2 - Erase b	
US 370	804 – 805	8.02.3	2nd paragraph, sub-bullet a)	Te	The inclusion of “that support them” is unclear.	Remove “...that support them” OR Amend to read: “...required to achieve its objectives.”	Accepted with modification
DE 029 371	807	08.02.03			Preferable to streamline wording using identical terminology (see comment regarding lines 316 – 320, clause 3.70); also, all risks should be evaluated as risk evaluation takes place to decide on risk treatment	Change wording to: c) evaluate the risk of disruptive incidents;	Not accepted
ZA 372	807	08.02.3		te	You do not evaluate only risks that require treatment. Split the sentence	Evaluate risks of disruption Develop treatment action	Not accepted. Covered in 8.3
COL 373	808	8.3		Te/ ed	Could be opposed to the change of “Strategy” to “Solution.” I would hate to be the person responsible for selling a “Solution” to top management that doesn’t ensure full continuity of operations during an actual disruptive incident. A “Solution” infers everything is done and over and fixed so we are all good – no need for the rest of the standard’s requirements.	Change 8.3 to Business Continuity Strategy Add text under title (808) that says something like, “The organization shall identify a Business Continuity Strategy that is aligned with meeting its business continuity objectives. The Business Continuity Strategy shall be comprised of one or various solutions that allow the organization to meet those objectives.” Modify 8.3.1 to say, “Identification and selection of solutions to meet the Business Continuity Strategy	Accepted with modification -
US 374	808	08.03		Ge	In consultation with stakeholders, the word “solutions” is causing more confusion. Given this is an English language standard, we should work to retain “strategies” or “capabilities” as noted in CD1 and when translating, using a better word in that translated language.	Revert back to “strategies” or “capabilities” as opposed to “solutions”.	Accepted with modification
US 375	808	08.03		Te / ed	Vehemently opposed to the change of “Strategy” to “Solution.” I would hate to be the person responsible for selling a “Solution” to top management that doesn’t ensure full continuity of operations during an actual	Change 8.3 to Business Continuity Strategy Add text under title (808) that says something like, “The organization shall identify a Business Continuity Strategy that is aligned with meeting its business continuity objectives. The Business	Accepted with modification

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					disruptive incident. A "Solution" infers everything is done and over and fixed so we are all good – no need for the rest of the standard's requirements.	Continuity Strategy shall be comprised of various solutions that allow the organization to meet those objectives." Modify 8.3.1 to say, "Identification and selection of solutions to meet the Business Continuity Strategy	
US 376	808	08.03		Te	I disagree with changing the term 'strategy' to 'solutions'. I understand that this has been accepted in the prior draft given the shift to the term solutions in the BCI GPGs 2018. This overlooks a much-needed element of the process. Strategy and solutions are two separate yet connected requirements. Strategies are strategic, high-level methods of achieving an objective. Solutions are the tactical ways in which such strategies can be achieved. For example, a strategy may be to work remotely in the event that the office is unavailable. Solutions to meet this need include working from home, working from alternate company offices, working from client sites etc.	Either amend back to strategies OR Re-term as follows [additional text highlighted in yellow]: 8.3 Business continuity strategies and solutions 810: Identification and selection of strategies and solutions shall be based on the outputs from the business impact analysis and 811 risk assessment, taking into consideration their associated costs. Additional text: Business continuity strategies identify strategic opportunities to enable recovery. Business continuity solutions are then developed for each strategy, enabling fulfillment of the strategy through varying means. 812 The organization shall determine appropriate business continuity strategies and solutions for:	Accepted with modification
US 377	810	8.3.1		te	Improve readability	Insert "risk treatment" after the fourth word in the sentence.	Superseded
DE 038 378	After 811	08.03.1	Identification and selection		The standard should mention a concrete example for a BC-Solution.	E.g. "Solutions determine possibilities, to react to an incident. A solution could be stated as a course for action."	Superseded
FR17	812	8.3.1		ge	There is no reference to security solutions such as	Modify as follows:	Not accepted

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379					evacuation or confinement.	"The organization shall determine appropriate business continuity and security solutions for:"	
JP16 380	812-819	08.03.1			Concept of "preparedness" is missing from proposed draft. Concept of "preparedness" is important factor in BCMS	Add following as 8.3.3 8.3.3 Protection and mitigation For identified risks requiring treatment, the organization shall consider proactive measures that a) reduce the likelihood of disruption, b) shorten the period of disruption, and c) limit the impact of disruption on the organization's key products and services. The organization shall choose and implement appropriate risk treatments in accordance with its risk appetite.	Not accepted – already addressed via 8.2.3 b)
PT 381	812-815	8.3.1		te	In the requirement: "The organization shall determine appropriate business continuity solutions for: a) responding to disruptive incidents; b) continuing and recovering prioritized processes and activities and their supporting resources; c) suppliers whose failure to deliver would disrupt prioritized processes and activities." First 2 points define objectives of the BC Solutions and 3 rd point is about a specific resource you need to take into account when defining BC Solutions and should be under 8.3.2 resource requirements.	Delete c) The organization shall determine appropriate business continuity solutions for: a) responding to disruptive incidents; b) continuing and recovering prioritized processes and activities and their supporting resources.	Accepted
FR18 382	813	8.3.1		te	Prevention and Response It is useful to distinguish two kinds of solutions:" - Prevention (ex: conformity with building standards to protect against earthquake) - Reactive solutions when a disruptive incident occurs (ex: give people whistles they can use if the buildings collapse during an earthquake), which seems to be the Response as described in § 8.4 The sentence in lines 812 and 813 : "determine	Modify as follows the sentence in lines 812 and 813: "The organization shall determine appropriate (...) solutions for: a) preventing the exposure to disruptive incidents b) responding to disruptive incidents"	Not accepted

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					<p>appropriate (...) solutions for: a) responding to disruptive incidents” can be understood as avoiding prevention in this document.</p> <p>It is necessary to clarify whether prevention is or is not in the scope of BCMS. No other ISO standard seems to be in charge of that key aspect. If prevention is in the scope, it is necessary to clarify where preventive solutions are determined: our understanding is that both preventive and reactive solutions are determined among the Solutions (§ 8.3)(ex Strategy), and only reactive solutions are detailed in the Response (§ 8.4) and the response plan (§8.4.4).</p> <p>In any case, it would be useful to know clearly whether prevention is treated in this document and by what “plans”.</p>		
NL 383	814	08.03.1		te	<p>In the solution part we should not talk about ‘supporting resources’ anymore, but about ‘required resources’. In line with 8.3.2 (see line 822 and onwards).</p> <p>Change</p>	Change 814 to: b) and their <u>required</u> supporting resources;	Accepted
PL 384	814	08.03.1.b		ge	<p>In this sentence (and further) occurs concept: “prioritized processes and activities”. What are the “prioritized processes”? Is this concept not included in the definition of prioritized activity?</p>		Accepted
BR25 385	815	08.03.1 c)	Paragraph	Te	<p>Other ISO Standards like ISO 9001 and ISO 14001 use the term “external providers” instead of suppliers. For this reason would be interesting to follow the same line of reasoning. This comment refers also to the subclause 8.3.2 h) – line 832.</p>	Replace supplier with external provider	Superseded
PT 386	820-821	08.03.1		ed	<p>Should be add an “and” in the sentence: The organization shall choose and implement risk treatments based on its risk criteria, the amount and type of risk that the organization may or may not take.</p>	The organization shall choose and implement risk treatments based on its risk criteria and the amount and type of risk that the organization may or may not take.	Accepted
PT	820-821	08.03.1		te	This requirement:	Suggest adding subclause “8.3.3 Implementation”	Accepted with modification

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387					“The organization shall choose and implement risk treatments based on its risk criteria, the amount and type of risk that the organization may or may not take.” should not be under “Identification and selection”.	so structure would be: 8.3 Business Continuity Solutions 8.3.1 Identification and selection The organization shall choose risk treatments based on its risk criteria and the amount and type of risk that the organization may or may not take. 8.3.2 Resource requirements 8.3.3 Implementation The organization shall implement selected Business Continuity Solutions so that they can be activated when needed and selected risk treatments to mitigate associated risks.	
FR19 388	820	8.3		te	There is no transition with the previous Risk Assessment paragraph. It would be useful to explain immediately that solutions are dealing now with risk treatment. The sentence in line 820 would be perfect at this place.	2 actions: 1. Transferring the sentence in line 820 between lines 808 and 809. 2. Modifying sentence: “The organization shall choose and implement solutions in order to treat risks...”	Accepted with modification see PT387
UK 389	820	08.03.1		Ed	An extra space between risk and criteria?	Delete	Superseded
ZA 390	820	08.03.1		ge	This seems a bit misplaced. Suggest this is moved to just below clause 8.3 and it can be the intro to 8.3		Superseded
US 391	820	08.03.1	4th paragraph	Te	The term risk criteria does not appear in Clause 8.2.3 Risk assessment, and therefore adds no value here.	Amend to read: “The organization shall choose and implement risk treatments based on the amount and type of risk that the organization may or may not take.”	Superseded
CA 392		08.03.1.3			Ordered list at bottom of page 30 changes format at top page 31 - 1), 2), c), d) e)	Change format to be consistent	Not related to ISO 22301
US 393	823 – 824	08.03.2	1st paragraph, sub-bullet a)	Ed	Word should be in lowercase “People” should be replaced with “personnel” for consistency sake with Section 3 Terms and	Amend to read: “personnel”	Not accepted

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					definitions for interested parties		
PL 394	824	08.03.2		ed	To be consistent after words: "limited to" should be a colon.	The types of resources considered shall include but not be limited to:	Accepted
US 395	823 – 824	08.03.2	1st paragraph	Ed	The sentence would be clearer if it referenced business continuity solutions. Further, the sentence should end with a colon.	Amend to read: "The organization shall determine the resource requirements to implement the selected business continuity solutions. The types of resources considered shall include but not be limited to:"	Accepted
PL 396	825	08.03.2 a		ed	The word "People" should be a lowercase letter.		Accepted
UK 397	825-831	08.03.2		Ed	Semi-colons should end the list items throughout, this currently alternates between ; and ,	Replace , with ; throughout	Accepted
PL 398	827-831	08.03.2 c-g		ed	To be consistent, all sentences should be ended with a semicolon and not with a comma.		Accepted
PT 399	827-828	08.03.2		te	The use of the terms "buildings (i.e. physical infrastructure)" and "facilities (i.e. services within buildings)" in these requirements is confusing. The use of the term facility to refer to a physical infrastructure is very common, for example, when referring to a refinery or a power plant (industrial facilities). Point c) should refer only to physical infrastructure and point d) just to equipment and consumables.	Change requirements as follows: c) physical infrastructure such as buildings, work places or other facilities and their associated utilities, d) equipment and consumables,	Accepted
IL 400	832	8.3.2	After line 832	ge	To add NOTE 1 to the subclause	The organization should cooperate with organizations in surrounding area relating specific risks, like: earthquake, tsunami, floods, volcanic eruptions and more.	Not accepted Consider for ISO 22313
IL 401	832	8.3.2	After line 832	ge	To add NOTE 2 to the subclause	The organization should cooperate with competitor organizations (Coopertition = Cooperation + Competition) relating externality risks, mainly in cases of global components and/or row material	Not accepted Consider for ISO 22313

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						shortages and allocations.	
CA 402		08.03.2.4			Same problem with ordered list	Change format to be consistent.	Not related to 22301
UK 403	834-853	08.04.1		Te	This section was part of our collective editing and thought process which has now resolved itself in the subsequent sections. So this content is now in 8.4.4. Consequently there is no need for this section at all. See also next comment as these are related.	Delete all of 8.4.1	Not accepted
UK 404	834	08.04.1		Te	Assuming that we delete the current 8.4.1 then it may make sense to have a "General" but to a rather different purpose, to introduce what is coming. So this might say something about the following sections.	Create a new 8.4.1 General with text: "The organization shall create a team structure that will enable timely warning and communication to relevant interested parties and provide them with supporting guidance and information."	Accepted with modification
AU 405	835	08.04.1		GE	Needs to be consistent with other simplifications	Replace "create" with "implement"	Accepted with modification
US 406	835 - 836	08.04.1	1st paragraph	Te	As written Section 8.4 is very unclear. This general clause (8.4.1) refers to business continuity plans, but Section 8.4 includes both BCPs and (incident) response plans. The loss of a clause specifically for BCPs is a mistake. In the sequence of response activities, it makes more sense to move business continuity under a new "Business continuity plans" clause immediately following "Response plans".	Amend to read: "The organization shall implement and maintain response plans and business continuity plans and procedures to manage a disruptive incident and continue the activities required to achieve its business continuity objectives." Move remainder of Clause 8.4.1 under new 8.4.5 Business continuity plans (and renumber following clauses)	Accepted with modification
US 407	836	08.04.1		Ge	Align to organizational structure language and improve readability.	Add the words "processes and" before the word "activities" and remove "the" after the word "on"	Superseded See UK 404
US 408	835	08.04.1	1st paragraph	Ed	The following terms can be simplified throughout the Standard: "create and maintain"	Amend to read: "The organization shall implement and maintain business continuity plans....."	Accepted with modification

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US 409	835	08.04.1	2nd paragraph, NOTE	Ed	The note does not add any guidance to the reader.	Remove the note.	Accepted
FR20 410	835	8.4.1		te	Consistency of planification It is necessary to outline the need of consistency and appropriate interactions between the different plans of an organization if there are several of them. It is important that these plans make sense and system together. There are two possibilities: using a singular term or introducing a concept of collection of plans	Modify sentence in line 835 as follows: “The organization shall create, and maintain a business continuity plan or a consistent collection of interconnected business continuity plans and procedures ...”	Superseded see UK 404
FR22 410A	835	8.4.1		te	To link with business continuity solution To use defined terms, here: invocation, interested parties To structure the objective of the business continuity Plan	Modify as such: The organization shall create, and maintain business continuity plans and procedures to manage effectively a disruptive incident and to facilitate the invocation and implementation of business continuity solution	Superseded see UK 404
BR26 411	835 and 836	08.04.1	Paragraph	Te	In this subsection consider to include explicitly the safety of personnel to be considered in all remaining subsections, this way given more appropriated support for the items already defined in those subsections.	On lines 835 and 836 "The organization shall create, and maintain business continuity plans and procedures to manage a disruptive incident, safeguard life, and continue its activities based on the business continuity requirements."	Accepted with modification see UK 404
FR21 411A	837	8.4.1		te	Precise the scope of the Response about security aspects (see line 812) and reactive, not preventive, solutions (see line 813).	Modify "837 The plans and procedures shall be used when required to execute business continuity solutions." as follows: “The plans and procedures shall be used when required to execute reactive solutions on business continuity and security ”	Not accepted
US 412	842	08.04.1		Te	The list includes activation criteria but no process for standing down.	Add either after c) or at the end, “A process for standing down	Accepted with modification - now covered in 8.4.4 BC Plans
FR23 412A	845	8.4.1		te	Interested parties are not mentioned	Modify f) as such: “internal and external interdependencies, including	Not accepted

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						commitments regarding interested parties”	
US 413	847	08.04.1	3rd paragraph, sub-bullet h)	Te	The inclusion of “reporting requirements” is unclear. Does it apply to reporting at time of incident, or instead relates to maintenance and version control guidelines?	WG2 needs to clarify the (type of) reporting requirement.	Not accepted
DE 031 414	849	08.04.01			Preferable to streamline wording using identical terminology (see comment regarding lines 316 – 320, clause 3.70)	Change wording to: ... steps that are to be taken during and following a disruptive incident;	Withdrawn
US 415	850	08.04.1	4th paragraph, 3rd indent	Ed	Sentence flow can be improved.	Amend to read: “- be flexible to respond to the changing internal and external conditions of a disruptive incident.”	Accepted
US 416	851	08.04.1	4th paragraph, 3rd indent	Te	The inclusion of this requirement is unclear.	Remove in its entirety.	Not accepted. Consider for ISO 2313
AU 417	852	08.04.1		TE	Consequence is a RM construct	Replace “consequence” with “impact”	Accepted
JP17 418	854	08.04.2 and 8.4.4	e), f) 1)~4) and d), e) 1)~4)		Content of e) and f) of 8.4.2, and d) and e) of 8.4.4 are duplicated.	Delete the either e) and f) of 8.4.2, or d) and e) of 8.4.4	Accepted to remove from 8.4.4
UK 419	854	08.04.2		Te	I think logically we should have the structure for response, then warning and communication and then the plans, so switch 8.4.2 and 8.4.3 around	Move current 8.4.2 to after current 8.4.3	Accepted with modification – order reviewed
TH 420	855	08.04.2		ed	“procedures” should read “processes”.		Not accepted
US 421	856, 857, 861 and 862	08.04.2		Te	Bullets A and E seem to overlap. The specificity in E seems different from the rest of the standard.	Recommend consolidation and retaining A above E.	Accepted with modification
NL	861-867	08.04.2 +		te	There is unnecessary duplication of text in lines	Change text to:	Accepted with modification

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422		8.4.4			861-867 and 909-915. Details of the organization's media response should be dealt with in the response plans and do not need to be covered here.	e) details of the organization's media response following an incident, including: 1) a communications strategy; 2) preferred interface with the media; 3) guideline or template for drafting a statement for the media; and 4) appropriate spokespeople	
US 423	861 - 862	08.04.2	1st paragraph, sub-bullet e)	Ed	Employees are part of personnel, who are therefore interested parties. Further, it is unclear which emergency contacts are being referred to here. This same instruction is repeated in Clause 8.4.4 d)	Amend to read: "e) details on how and under what circumstances the organization will communicate with interested parties, including employee's relatives and/or their other emergency contacts;" [Note: I called out the relatives of the employees because they are typically not defined as an interested party.] WG2 should consider if this instruction needs to be repeated in Clause 8.4.4 d) or one instance removed.	Accepted with modification – revised text clarifies Not repeated
US 424	863	08.04.2	1st paragraph, sub-bullet f) 1) – 4)	Ed	The requirements are repeated in Section 8.4.4 e).	Remove sub-bullet f) 1) – 4) in its entirety.	Accepted
US 425	868	08.04.2	1st paragraph, sub-bullet g)	Ed	The term "vital information" is non-standard. Inclusion of the word "disruptive" would be appropriate given the subsequent sub-clauses reference "disruptive incident". The semi-colon at the end of the sentence should be changed to a colon to reference the following sub-bullets (see below)	Amend to read: "g) recording of details of the disruptive incident, actions taken and decisions made, and the following shall also be considered where applicable:" WG2 to consider if the standard should contain a new sub-bullet for alerts, notifications, and communications.	Accepted with modification
US 426	870 - 872	08.04.2	1st paragraph, sub-bullet h) – j)	Ed	These sub-bullets should be indented as they relate to sub-bullet g)	These sub-bullets should be indented or numbered (similar to 8.4.2 f) 1) – 4))	Accepted
US 427	871	08.04.2	i)	Te	The language on this point needs to be clearer. Text inserted states: i) assuring the interoperability of multiple	I'm not 100% clear on the intent, but suggest something along the following lines: i) ensuring appropriate coordination and	Accepted with modification

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					responding organizations and personnel;	consistency when multiple interested parties are invoked	
US 428	872	08.04.2	1st paragraph, sub-bullet j)	Te	Unclear what is meant by “operation of a communications facility.”	WG2 to clarify.	Noted
AU 429	873	08.04.2		TE	‘Regularly’ is too vague	Replace “regularly exercised” to “exercised as part of the organization’s exercise program referred to in 8.5.”	Accepted
DE 044 430	874	08.04.3	Response Structure		The descriptions of the Incident Response Structure are insufficient/ not extensive enough.	Fundamental aspects of crisis management should be included as an inherent part of the standard.	Noted
FR24 430A	874	8.4.3		te	Problem of terminology: Response structure or Crisis management team? The expression “Response structure” wants to be general, but, being abstract, may be confusing because of the distance with the real life. Why not Crisis management team which is the term used in the real life (see CEN 17091)	Modify sentence in line 875 as follows: “The organization shall establish, document, and implement a response structure (for example a crisis management team, business continuity management team, etc.) identifying one or more teams responsible for responding to disruptive incidents.”	Partially accepted with modification Delete ‘team’. No examples
FR25 430B	877	8.4.3		te	Precise that the nature of the event, stake and issues must be taken into account while defining these aspects.	Modify sentence in line 877 as follows: “The roles and responsibilities of each team and the relationships between the teams shall be clearly stated, taking into account the nature of the event, along with stakes and issues”	Not accepted
US 431	885	08.04.3		Te	Not all organizations include life safety in their business continuity plans. More often life safety is part of a physical security plan for example.	Remove e)... (using life safety as first priority) Add a note, “If life safety is included in the scope of the BCMS then the response structure should include life safety procedures.	Not accepted
AU 432	892	08.04.3		TE	Designated roles must have alternates to the primary person	New wording “personnel and their alternates , with the necessary”	Accepted
UK	896	08.04.3		Ed	Blank line	Delete	Accepted

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433							
US 434	896	08.04.3	Blank row	Ed	Blank row.	Remove blank row.	Accepted
US 435	897	08.04.4		Te	Response Plans is too narrow. This is a business continuity response so this information needs to be tied to business continuity plans. Every MS has a response to an incident – an information security incident for example. An information security incident could also cause a business interruption. As this is a standard on business continuity it needs to go further than “response to a disruptive incident.” All incidents are disruptive. This has become so general that it has little value.	8.4.4 Business Continuity Plans Business continuity plans shall provide guidance and information that assists the assigned teams to respond to a business interruption (interruption of critical activities within predetermined timeframes and at predetermined levels as identified in the BIA). The business continuity plans shall collectively document the specific solutions to meet the Business Continuity Strategy.	Accepted with modification
FR26 435A	898	8.4.4		te	Recovery should be inside the global BC plan For the same reason of consistency of the planification, the details of the recovery solutions should be determined inside the global plan or the collection of interconnected plans, event if this part of the response plan(s) is not managed by the response team.	Complete as follows: “The response plans shall provide guidance and information that will assist the teams to respond to a disruptive incident and assist the organization for the recovery ”	Accepted with modification
JP18 436	897-922	08.04.4	all	ge	Term “Business continuity plan” is defined in 3.27. Therefore use “Business continuity plan” instead of “response plan”	Change “resource plan” into “Business continuity plan” across the 8.4.4	Accepted with modification
US 437	898 and 901	08.04.4		Ge	References are made to teams without introduction or a requirement for teams.	Recommend changing to the organization rather than teams.	Not accepted
US 438	901	08.04.4	2nd paragraph, sub-bullet a)	Ed	The use of the word “its” is superfluous.	Amend to read: “a) details of the actions that the teams will take in order to continue or recover prioritized activities within predetermined timeframes and....”	Accepted

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DE 032 439	902	08.04.04			Preferable to streamline wording using identical terminology (see comment regarding lines 316 – 320, clause 3.70)	Change wording to: ... to monitor the effects of the disruptive incidents and ...	Accepted with modification to singular, disruption
ZA 440	904	08.04.4		te	“pre-defined impact thresholds” is a misnomer. simplify	Pre-defined threshold	Accepted
US 441	904	08.04.4	2nd paragraph, sub-bullet b)	Te	Clause 8.4.3 mentions “thresholds” only. The use of the term “impact thresholds” has not been defined.	Amend to read: “b) reference to the pre-defined thresholds and process for activating response.”	Accepted
US 442	908	08.04.4 c) 3)		Te	What is meant by protection of the environment? This is the first time anywhere in the standard where the environment is mentioned. What percentage of organizations impact the environment?	Remove. Put in guidance document.	Not accepted
COL 443	909-921	8.4.4		te	Probably of these requirements become listed elsewhere in the document	Probably need delete them	Accepted
US 444	909-916	08.04.4		Ge	Bullets D and E overlap with Clause 8.4.2	Recommend removing or genericizing and indicating that warning and communication should be added to the plan/procedures.	Accepted
US 445	909-921	08.04.4		Te	Each of these requirements has been listed elsewhere in the document	Delete them.	Accepted
US 446	909-921	08.04.4		Te	Need some content here for what should be included in the business continuity plans that hasn't already been documented elsewhere and is actually what is usually seen document in a BC plan. So far much of what we normally see in a BC plan is missing.	The business continuity plans shall collectively contain documentation of the overall BC strategy including procedures to implement the specific solutions necessary to meet the response requirements. The procedures documented in shall include consideration of the following requirements to ensure continuity or recovery of activities that support the provision of products and services:	Partially accepted Consider full list for ISO 22313

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						<ul style="list-style-type: none"> • How the organization will stabilize, continue, resume and recover its prioritized activities that support the provision of products and services • At what level of service the organization will provide the prioritized activities. • When the prioritized activities shall be available. • How the organization will manage dependencies and interdependencies that support the provision of.... • The primary and alternate locations, work environments, and buildings needed to continue or recover its prioritized activities • The people (number, skills and qualifications) needed • The resources (supplies and equipment) needed to continue or recover • The information and data (records and documentation) the organization depends upon to continue or recover its prioritized activities • The information and communication technology systems needed to continue or recover the activities that support the provision of products and services. • How the organization will manage the interruption in the supply chain • Transportation requirements • Financial requirements • Procedures to restore and return business activities from the temporary measures adopted to support normal business requirements after an incident. 	
US 447	909 - 910	08.04.4	2nd paragraph, sub-bullet d)	Ed	<p>Employees are part of personnel, who are therefore interested parties.</p> <p>Further, it is unclear which emergency contacts are being referred to here.</p> <p>This instruction is repeated in Clause 8.4.2 e)</p>	<p>Amend to read:</p> <p>“d) details on how and under what circumstances the organization will communicate with interested parties, including employee’s relatives and/or their other emergency contacts;” [Note: I called out the relatives of the employees because they are</p>	Superseded

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						typically not defined as an interested party.] WG2 should consider if this instruction needs to be repeated in Clause 8.4.2 e) or one instance removed.	
PT 448	911-915	08.04.4		TE	<p>“e) details of the organization’s media response following an incident, including</p> <ol style="list-style-type: none"> 1) a communications strategy, 2) preferred interface with the media, 3) guideline or template for drafting a statement for the media, and 4) appropriate spokespeople.” <p>May be a very demanding requirement for small organizations. It should be included something simpler and this detail, if necessary, can be moved to ISO 22313.</p>	e) details of the internal and external communications strategy during and after a disruptive event;	Superseded
DE 043 449	After 922	08.04.4	Response plans		There should be a connection between the response plans and the crisis management (crisis team). The response plans should be known to the crisis team in terms of activation and operation.	The final response plans shall be reconciled with the crisis management.	Not accepted
FR27 449A	924	8.4.5		te	<p>Recovery should be inside the global BC plan</p> <p>For the same reason of consistency of the planification, the details of the recovery solutions should be determined inside the global plan or the collection of interconnected plans, event if this part of the response plan(s) is not managed by the response team.</p>	<p>Replace the sentence by :</p> <p>« The organization shall have plans and documented procedures to restore.. »</p>	Not accepted
JP19 450	924	08.04.5	Para 1	te	<p>We believe that it is no necessary to have documented procedure. Necessity of documented procedure is depending on organization’s decision, not specified in this standard.</p> <p>Important thing is to establish process, not documented procedures.</p>	Modify “documented procedure” to “processes” and read as “The organization shall establish processes to restore and return business activities” ...	Accepted with modification
BR27	925	08.04.5	Paragraph	Te	I understand that more details should be provided	Note: examples to be considered on the procedures	Not accepted – no content

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451					here	are...	provided
PT 452	926	08.05		te	The title of the clause is “exercise programme” but there is no other reference to the programme in the clause. It should be included a requirement to document such a programme.	The organization shall document an exercise programme containing a series of exercises planned to validate the whole of its business continuity solutions.	Accepted with modification
UK 453	926	08.05		te	The heading has been changed from ‘Exercising and testing’ to ‘Exercise programme’ without any change to the opening paragraph which states the requirement for the organization to ‘exercise and test its business continuity procedures’ and does not mention the term ‘exercise programme’ For many, testing is a subset of exercising, so it would better to change the heading to ‘Exercising and maintenance’ and replace testing in the opening paragraph. [It might be considered that 9.1.2 covers this so consider this when reviewing this comment]	Change heading to: ‘Exercising and maintenance’ and the opening paragraph to read as follows: ‘The organization shall exercise and maintain its business continuity procedures to ensure that they remain consistent with its business continuity objectives’	Superseded, see 452
UK 454	927	08.05		Te	I am not convinced we are exercising and testing “procedures” exactly. We are exercising the people and teams (see point c for instance) to improve their ability to cope and perform their roles. So perhaps we could simply remove the word “procedures”?	Delete “procedures” Alternatively consider replacing with “solutions”	Accepted with modification
US 455	927	08.05	1st paragraph	Ed	Missing wording.	Amend to read: “The organization shall exercise and tests its business continuity plans and procedures...”	Superseded, see 452
UK 456	932	08.05	c)	Ed	Perhaps “competency” should read “competence”?	Change “competency” to “competence”	Accepted
US 457	934	08.05	2nd paragraph, sub-bullet d)	Ed	Simplify wording.	Amend to read: “d) taken together over time validate its business continuity solutions;”	Not accepted

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AU 458	935	08.05		TE	Exercise cannot minimize the risk of disruption. It can indicate whether the duration of a disruption will exceed the business defined requirement	Replace with: “confirms whether the time taken to implement a capability or undertake a procedure will not exceed the business defined requirement.”	Accepted with modification - deleted
DE 033 459	935	08.05			Preferable to streamline wording using identical terminology (see comment regarding lines 316 – 320, clause 3.70)	Change wording to: e) minimize the risk of disruptive incidents to processes and activities and . . .	Superseded – see 458
PT 460	939	08.05	h)	ed/te	The word “conduct” is repeated in point h) and the word environment is confusing. The organization shall conduct exercises and tests that: h) are conducted at planned intervals and when there are significant changes within the organization or to the environment in which it operates.	The organization shall conduct exercises and tests: a) consistent with the scope and objectives of the BCMS; b) based on appropriate scenarios that are well planned with clearly defined aims and objectives; c) to develop teamwork, competency, confidence and knowledge for those who have roles to perform in relation to disruptive incidents; d) that taken together over time validate the whole of its business continuity solutions regularly ; e) to minimize the risk of disruption to processes and activities and the delivery of products and services; f) produce formalized post-exercise reports that contain outcomes, recommendations and actions to implement improvements; g) that are reviewed within the context of promoting continual improvement; and h) according to the exercise programme and when there are significant changes within the organization or in the context in which it operates.	Not accepted to change to point d) since regularity is subjective and is based on the exercise program as described in point h) Accept with modification to point h)
ZA 461	940	08.05		ge	Consider including a reference to the exercise standard	See ISO 22398:2013 Edition 1, Societal security — Guidelines for exercises	Not accepted
UK 462	940	08.05	f)	te	There is no mention in clause 8.5 of the requirement to act on the results of exercising and testing. Sub-clause f) states the requirement to produce formalized post-exercise reports that	Add new paragraph below sub-clause h): The organization shall act on the results of its exercising and testing to implement approved changes and improvements	Accepted with modification

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					contain outcomes, recommendations and actions to implement improvements, but there is no requirement to implement them The requirement to maintain business continuity procedures is implied but it would be helpful to state the specific requirement here to make it clear to the reader. [It might be considered that 9.1.2 covers this so consider this when reviewing this comment]		
FR28 462A	941	9		te	Performance evaluation: bias The § 9 Performance evaluation is too focused on conformity with the requirements. There is an alternative way, often better accepted by the organizations according to their maturity, to conduct a performance evaluation which is the assessment of the results of the strategy.	Improve and complete the summary of the § 9 Performance evaluation as follows: 9 Performance evaluation 9.1 General 9.2 Review 9.3 Assessment of results of BCMS solutions (new paragraph at the same level than audit) 9.4 Audit	Not accepted
PL 463	944	09.01.1		ed	After words: "shall determine" should be a colon.	The organization shall determine:	Accepted
US 464	944	09.01.1	1st paragraph	Ed	The sentence is missing a colon.	Amend to read: "The organization shall determine:"	Accepted
PL 465	945-947	09.01.1 a-c		ed	To be consistent, all sentences should be ended with a semicolon and not with a comma.		Accepted
BR28 466	946	09.01.1	Paragraph	Te	Improve robustness of performance evaluation	Include after line 946 "NOTE The methods selected should produce comparable and reproducible results to be considered valid."	Not accepted Consider for ISO 22313
BR29 467	947	09.01.1	Paragraph	Te	Improve robustness of performance evaluation	Include after line 947 "d) who shall monitor and measure;"	Accepted with modification when, and by whom the

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							monitoring...
BR30 468	948	09.01.1	Paragraph	Te	Improve robustness of performance evaluation	Include after line 948 "f) who shall analyze and evaluate these results."	Accepted with modification when, and by whom the monitoring...
BR31 469	950	09.01.1	Paragraph	Ed	Improve understanding of the section, move line 950 to line 943	Line 950 "The organization shall evaluate the BCMS performance and the effectiveness of the BCMS." should be after line 943	Not accepted Annex SL text
SE 470	951	09.01.2		Te	The annex SL is enough move all other text to 22313. 9.1.1 is redundant	Move 9.1.2 to 22313	Not accepted
NL 471	951	09.01.2			This subclause is quite confusing. It addresses elements that can be considered part of 'monitoring, measurement, analysis and evaluation' (9.1.1), internal audit (9.2) or management review (9.3). This subclause should not be a separate one; the requirements should be merged with one of the appropriate other subclauses of clause 9. It is not clear what type of evaluations are meant in line 958.	Merge the requirements in this subclause with other appropriate subclauses in clause 9 and delete this separate 9.1.2	Not accepted
US 472	951	09.01.2	Heading	Ed	Reference to (incident) response plans is missing.	WG2 to discuss if heading should be amended to read: "Evaluation of response plans, business continuity plans, procedures and capabilities	Superseded
COL 473	952-959	9.1.2		ed	Se necesitan bullets	La organización deberá: a) Evaluar la pertinencia... b) Evaluar periódicamente el cumplimiento ... c) Llevar a cabo evaluaciones planeadas ... Estas evaluaciones se realizarán a través de ...	Accepted.
US 474	952-959	09.01.2		Ed	Bullets needed.	The organization shall: a) Evaluate the suit...	Accepted

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						b) Periodically evaluate compliance... c) Conduct evaluations at planned... These evaluations shall be undertaken through....	
NL 475	952	09.01.2			Review is defined as 'determination of the suitability, adequacy of effectiveness of an object to achieve established objectives'	The organization shall evaluate	Not accepted
US 476	952	09.01.2	1st paragraph	Ed	Reference to (incident) response plans is missing.	WG2 to discuss if sentence should be amended to read: "Evaluation of response plans, business continuity plans, procedures and capabilities	Superseded
FR29 476A	954	9.1.2			There is a lack of reference to the experience feedback (retour d'expérience/RETEX/REX in french) as a mean to collect information on the performance.	Modify the sentence to introduce the term "experience feedback": "These evaluations shall be undertaken through periodic reviews, analysis, exercises, tests, post-incident reports, experience feedback and performance evaluations ";	Not accepted
PL 477	955	09.01.2		ed	The sentence ends like this: "... performance evaluations.;" In my opinion semicolon at the end of this sentence is unnecessary.	These evaluations shall be undertaken through periodic reviews, analysis, exercises, tests, post-incident reports and performance evaluations.	Accepted to delete semicolon
US 478	957	09.01.2	3rd paragraph	Ed	Reference to industry best practices may be better aligned with good practices and guidelines per Clause 9.3.1, sub-bullet j)	Amend to read: "...industry good practices and guidelines..."	Not accepted
FR30 478A	960	9.2			Introduce a new paragraph about an alternative way of performance evaluation than examining the instant conformity to requirements	Introduce before § Internal audit a new § as follows: 9.3 Assessment of results of BCMS solutions The organization could periodically assess the results – expected or not expected, positive or negative - of the BC solutions in order to adapt and improve the strategy in a dynamic way.	Not accepted
US 479	962	09.02	1st paragraph	Ed	Use of the BCMS acronym is used throughout the Standard. The sentence is missing a colon.	Amend to read: "The organization shall conduct internal audits at planned intervals to provide information on whether the BCMS:"	Accepted

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JP20 480	962	09.02	Para 1	ed	Both BCMS and business continuity management system are used in this proposed draft. It is necessary to be consistent use of these term	We propose to use BCMS Change "business continuity management system" into "BCMS" and read as; "...on whether the BCMS."	Accepted
PL 481	964	09.02.a.1		ed	To be consistent, this sentence should be ended with a semicolon and not with a comma.		Accepted
AU 482	968	09.02		GE	Needs to be consistent with other simplifications	Remove "plan, establish"	Not accepted Annex SL
JP21 483	968-975	09.02	Bullet 1-5	ed	Need to refer to the bullet easily	Replace "-“ with “a) - e)” and read as; a) plan, ... b) define... c) select... d) ensure... e) retain...	Not accepted Annex SL
NL 484	978	09.03.1	1		This line is not part of the input.	Change text to: 9.3 Management review 9.3.1 General Top management shall review the organization's BCMS, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. 9.3.2 Management review input The management review shall include consideration of:	Accepted
AU 485	982	09.03.1		ED	Abbreviated for in more consistent	Replace "business continuity management system" with "BCMS"	Accepted
US 486	982	09.02	2nd paragraph, sub-bullet b)	Ed	Use of the BCMS acronym is used throughout the Standard.	Amend to read: "b) changes in external and internal issues that are relevant to the BCMS;"	Accepted
PT 467	983	09.03.1	c)	te	The word trend in the requirement "information on the business continuity performance, including trends in:" is confusing, and would be better to use	"information on the business continuity performance, including an analysis of the evolution of:	Not accepted Annex SL

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					evolution. Trend suggests that you have to analyse numbers: last year 4 nonconformities and this year 6 can be an improvement but the trend analyse shows a worse situation.	1) nonconformities and corrective actions; 2) monitoring and measurement evaluation results; and 3) audit results;”	
UK 488	983	09.03		te	ISO 27001 usefully includes as one of the management review inputs, 'feedback from interested parties'. This would be a useful addition to the list	Include additional major bullet after 'The management review shall include consideration of: - feedback from interested parties	Accepted
SE 489	988	09.03.1		TE	The annex sl is enough, move all other text to 22313	Move bullet e-j to 22313	Not accepted to remove
US 490	988 - 994	09.02	2nd paragraph, sub-bullet e) – j)	Te	The inclusion of the additional sub-bullets seem to be gratuitous, for example d) stipulates opportunities for continual improvement so why is f) necessary?	Remove e) – j) Alternatively WG2 to consider each sub-bullet carefully and embed any additions prior to d) opportunities for continual improvement. Or if WG2 intends to retain the language then reorder to read: “d) the need for changes to objectives; e) products, services or procedures, which could be used to improve the BCMS performance and effectiveness; f) risks or issues not adequately addressed in any previous risk assessment; g) results of exercises and tests; h) lessons learned and actions arising from disruptive incidents and i) emergency good practice and guidance. j) opportunities for continual improvement.”	Not accepted to remove, accepted to re-order
NL 491	988	09.03.1	e)		This 'needs' shall be based on analysis and evaluations, therefore can only be part of the output of the management review;	Move this line to 9.3.2	Not accepted
PT 492	989-990	09.03.1	f)	te	Point f) is limiting the revision of top management to “products and services or procedures” when it should be analysed any resource that can be used	The management review shall include consideration of: f) resources which could be used in the	Accepted

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					to improve BCMS The management review shall include consideration of: f) products and services or procedures, which could be used in the organization to improve the BCMS' performance and effectiveness	organization to improve the BCMS' performance and effectiveness;	
NL 493	989	09.03.1	f)		Products and services or procedures (..) are part of opportunities for continual improvement (bullet d)	delete f) products and services (..) and effectiveness;	Not accepted
PT 494	991	09.03.1	g)	te	Point g) results of exercises and tests; Management review should consider information from the exercises and tests, but not just the results . We suggest using feedback as it is the word used in ISO 22398: "B.3.2 Elements influenced by feedback from the exercises and testing" And includes management review as one of the elements influenced by	g) feedback from exercises and tests;	Not accepted
NL 495	991	09.03.1	g)		Results of exercises and test are part of c) 2) Monitoring and measurement evaluation results;	delete g) Results of exercises and tests;	Not accepted
PT 496	992	09.03.1	h)	te	Point h) risks or issues not adequately addressed in any previous risk assessment; We think it should be more general as all relevant risk information should be provided and also relevant information from BIA.	h) relevant information arising from the BIA or risk assessment;	Accepted with modification
NL 497	992	09.03.1	h)		The knowledge about not adequately addressing risks (or issues) should be output 'somewhere'. This would be the output from some type of analysis. This is already part of c) 2) monitoring and measurement evaluation results;	delete h) risks or issues (..) risk assessment;	Not accepted
DE 034	992	09.03.01			The scope of the line is too wide, restrict to BC risks	Change wording to: h) business continuity risk or issues not adequately addressed . . .	Not accepted

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498						alternatively: h) risks of disruptive incidents or issues not adequately addressed . . .	
UK 499	992 993	09.03.1		Te	We often emphasise the need to learn from “near misses”, i.e. things that very nearly caused major disruption but did not. However we don’t mention this explicitly here.	Change to “lessons learned and actions arising from disruptive incidents and near-misses;” We might need to have something in ISO 22313 to explain the “near misses” in more detail	Accepted
NL 500	993	09.03.1	i)		lessons learned and actions arising from disruptive incidents are part of the results of 9.1.2 (evaluation of business continuity plan, procedures and capabilities) and are therefore already part of c) 2)	delete i) lessons learned and actions arising from disruptive incidents	Not accepted
NL 501	994	09.03.1	j)		Emerging good practice and guidance are part of opportunities for improvement (bullet d)	delete j) emerging good practice and guidance	Accepted
SE 502	995	09.03.2		Te	The annex sl is enough, move all other text to 22313	Move the non annex sl text to 22313	Not accepted
SE 503	995	09.03.2		Te	It is important that we also update the Gap analysis (22331)	Add Gap analysis under bullet c in section 9.3.2 Management review outputs The outputs of the management review shall include decisions related to continual improvement opportunities and the possible need for changes to the BCMS, and include the following: a) variations to the scope of the BCMS; b) improvement of the effectiveness of the BCMS; c) update of the risk assessment, business impact analysis, Gap analysis, business continuity plans and related procedures;	Not accepted
PT 504	995 - 1012	09.03.2		te	Point b) “improvement of the effectiveness of the BCMS” is a very general topic while the rest of the bullets on the list are a lot more specific. We suggest including the improvement in the introductory paragraph as in proposed change column. Point d) change the word incidents by issues as it	The outputs of the management review shall include decisions related to the possible need for changes to the BCMS to improve its efficiency and effectiveness , and may include the following: a) variations to the scope of the BCMS; b) modification of procedures and controls to respond to internal or external issues that may	Accepted

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					is not only speaking about incidents. Point e) "how the effectiveness of controls are measured" should be "how the effectiveness of controls will be measured." As you are talking about controls that have been modified in the previous list.	impact on the BCMS, including changes to: 1) business and operational requirements; 2) risk reduction and security requirements; 3) operational conditions and processes; 4) legal and regulatory requirements; 5) contractual obligations; 6) levels of risk and/or criteria for accepting risks; 7) resource needs; 8) funding and budget requirements; c) how the effectiveness of controls will be measured; d) update of the risk assessment, business impact analysis, business continuity plans and related procedures.	
BR32 505	986	09.03.1	Paragraph	Te	Improve robustness of management review	Include after line 986 "4) fulfilment of business continuity objectives;" and "d) feedback from interested parties;"	Superseded
AU 506	1000	09.03.1		GE	Improve the consistency with the rest of the standard	<ul style="list-style-type: none"> - Swap Risk assessment with Business Impact analysis - Insert 'solutions' between risk assessment and business continuity plans - Change "Risk Management" with "Management of Risk" 	Accepted Accepted Not accepted
NL 507	1002- 1011	09.03.2			The 'including changes to' bullets 1) to 8) of this section should be a NOTE or better be part of ISO 22313, not stated as a requirement here. It is not appropriate to include such a detailed and non-exhaustive listing	Delete , including changes to and 1) (line 1004) – 8) (line 1011)	Superseded
US 508	1002 - 1003	09.03.2	1st paragraph, sub-bullet d)	Ed	Superfluous use of the word "on".	Amend to read: "d) modification of procedures and controls to respond to internal or external incidents that may impact the BCMS, including changes to:"	Accepted
AU 509	1004	09.03.2		TE	Missing big picture considerations	Include the following two new entries: n) Strategic direction of the organisation	Superseded

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						n) The definition of the organization's context	
AU 510	1009	09.03.2		TE	How is point 6) to be done? Isn't this more about risk management – not BCMS	remove	Superseded
US 511	1009	09.03.2	1st paragraph, sub-bullet d) 6)	Te	The term “Levels of risk” (or “Level of risk” is not used elsewhere in Standard.	Amend to read: “6) risk criteria;”	Superseded
US 512	1013- 1016	09.03.2		Ed	The new requirements after 9.3.2 e) do not have any letter or number so is very confusing to reference.	Changed 1013 to 9.3.2.1 and 1014-1016 to The organization shall retain documented information as evidence of the results of the management reviews and a) Communicate the results of the management review to relevant interested parties b) Take appropriate action relating to those results.	Accepted
US 513	1023 - 1024	10.01	1st paragraph, sub-bullet b)	Ed	Missing a colon at end of sentence.	Amend to read: “b) evaluate the need for action to eliminate the causes of the nonconformity so that it does not recur or occur elsewhere, by:	Accepted
PL 514	1024	10.01.b		ed	After words ‘occur elsewhere, by” should be a colon.	evaluate the need for action to eliminate the causes of the nonconformity so that it does not recur or occur elsewhere, by:	Accepted
PL 515	1025- 1027	10.01.b.1-3		ed	To be consistent, all sentences should be ended with a semicolon and not with a comma.		Accepted
JP22 516	1030	10.01	e)	ed	Both BCMS and business continuity management system are used in this proposed draft. It is necessary to be consistent use of these term	We propose to use BCMS e) make changes to the BCMS, if necessary,	Accepted
US 517	1031- 1034	10.01		Ed	Need to have some kind of bullets to reference these requirements.	Each of these requirements is important but the way they are written makes it difficult to recommend a solution without changing to 10.2 or perhaps 10.1.1 and 10.1.2? and then a) and b)	Accepted

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JTC1/ SC27 JP 13 040 518		10.02	NOTE	ed	"can" is used. Does this mean permission, possibility or capability? See Tables 5 and 6 of ISO/IEC Directives, Part 2:2018.	Do not use "can" for permission.	Accepted
FR31 519	1037	10.2			There is a lack of reference to the experience feedback (retour d'expérience/RETEX/REX in french) as a mean to collect information on the performance.	"The organization can use the processes of the BCMS such as leadership, planning and performance evaluation, experience feedback (with lessons learned and best practices) to achieve improvement »	Not accepted
PT 520	1035	10.02		te	There is no reference to improvement actions in section 10, just corrective actions and non conformities. We suggested to include in section "10.2 Continual improvement" a reference to improvement actions, the need to prioritize them and approve them as part of a formal procedure. Include also natural ways to identify them.	Include the following text in section 10.2: The Organization shall define and document a procedure to manage improvement actions. Such procedure shall include prioritization and management approval. When an improvement action has been approved, it shall be documented, planned and treated in a timely manner in accordance to its priority and a responsible shall be assigned to guarantee the follow up until the final implementation. Improvement actions shall be identified, at least, through the following activities: <ul style="list-style-type: none"> ▪ BIA ▪ Risk Assessment ▪ Exercises ▪ Internal and External Audits ▪ Management Reviews 	Accepted with modification
NL 521	1036	10.02			Continual improvement is one of the most important parts of any management system standard. Making sure that the BCMS is effectively embedded in the organization and well-functioning is depending on this clause. With only one line, requirement, this is too non-committal and open-ended. There should be a requirement to cover the "core	Add content (requirements): ... of the BCMS, <u>focusing on the applied business continuity solutions, measures for prioritized processes and activities, related required supporting resources and the response plans and structures.</u>	Superseded

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					BCM elements” mentioned in clause 8.		
SE 522		Bibliography		Ge	Several documents in this list is not relevant anymore. Some have even been withdrawn and replaced by ISO 22301:2012 which has been adopted as national standard in most countries.	Delete 5, 6, 13,14, 15, 16, 17, 18	Accepted with modification
DE 036 523	1052	Bibliography			Use the most recent edition	Change to: ISO 31000 <i>Risk management - Guidelines</i>	Accepted
US 524	1039	Bibliography		Ed	New standard replaces Organizational Resilience: Security, Preparedness and Continuity Management Systems – Requirements with Guidance for Use (SPC.1) and Business Continuity Management (BCM)	Add new entry: “ANSI/ASIS ORM.1 2017 - Security and Resilience in Organizations and their Supply Chains – Requirements with Guidance”	Accepted
JTC1/ SC27 JP 14 041 525		Bibliography	[5]	ed	If ISO 22300:2018 is in Clause 2, it should be removed from Bibliography. If ISO 22300:2018 is removed tom Clause 2, it should be in the Bibliography.	If ISO 22300:2018 is in Clause 2, it should be removed from Bibliography. If ISO 22300:2018 is removed tom Clause 2, it should be in the Bibliography.	Superseded
JTC1/ SC27 JP 15 042 526		Bibliography	[7]	ed	ISO/IEC 24762 was withdrawn. Refer to ISO Standard Search. https://www.iso.org/search.html	Refer to ISO/IEC 27031 Guidelines for ICT readiness for business continuity if needed.	Accepted
US 527	1062 – 1063	Bibliography	[17]	Ed	Reference is outdated.	Amend to read: “ANSI/ASIS SPC.2 – 2011 Auditing Management Systems: Risk, Resilience, Security, and Continuity-Guidance for Application”	Accepted
ESG 37 528	67		Bibliography	ge	SS 540: 2008 Singapore Standard for Business Continuity Management was included as item (19) in ISO 22301:2012	To include SS 540: 2008 Singapore Standard for Business Continuity Management as item (19) in the Bibliography.	Not accepted

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