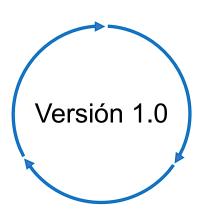




Reply to comments from the public consultation of the Global Zero Waste and Cercarbono's Protocol for Voluntary Certification of Circular Economy







Nope.	Entity /	Text/Comment	Protocol	Response
	Organization		Section	
1	Regional Autonomous Corporation of Cundinamarca	I want to register. Thanks.		Does not apply.
2	El Bosque University	Excellent document. I will socialize it with my Environmental Engineering students, Integral Waste Management class; with whom we will make comments that allow us to read and review comments that they freely generate Thank you very much.		Thanks for the comment.
3	o ngs	Thank you for your invitation together we are more.		Thanks for the comment.
4	Nuevo Amanecer de Colombia Foundation (New Dawn of Colombia Foundation)	Nuevo Amanecer de Colombia Foundation is a private non-profit organization that pursues the common interest or value, the improvement of the quality of life of its members and the Social Welfare of the inhabitants of the Choco Department, to promote the ability to be leaders with entrepreneurial skills for our members and their people		Thanks for the comment.
5	Circular Economy	Highly interested in participating from		Thanks for the comment.





Nope.	Entity /	Text/Comment	Protocol	Response
	Organization		Section	
	Departamental Board	the Departmental Board of Circular Economy of Quindío.		
6	Amor y Compromiso de Vida Foundation (Love and Life Commitment Foundation)	We are in the process of analyzing the document. Comments will be posted soon.		Thanks for the comment.
7	Fundación Avanzamos Limpiando & Restaurando (Cleaning & Restoring We go Forward Foundation)	Excellent content of the document, and corporate management to improve the performance of social, environmental, economic, and institutional responsibilities to meet the requirements of the parties and stakeholders, in the very same organizations certified in Zero Waste.		Thanks for the comment.
8	Recicla Más SAS (recycle more)	It is vital to control the route of GHG emissions, in the productive sectors of greatest industrial relevance where specific mitigation measures can be applied.		The SDG evaluation includes a validation of the reduction of GHG emissions.
9	consultancy	How to develop a circular economy model for the		Thanks for the comment. However, the





Nope.	Entity /	Text/Comment	Protocol	Response
•	Organization	·	Section	•
		aquaculture sector, shrimp processing.		development of such a model is outside the scope of this document.
10	Citizen Observatory to public management-CAL	Good afternoon, is it possible for the document to be sent to me in Spanish? Thank you very much		The document in public consultation was available in Spanish and English.
11	PARQUE DE MAQUINARIA SAS (MACHINERY PARK)	We need to carry out the process for certification.		The certification process is detailed in Section 8 of the Protocol.
12	PARQUE DE MAQUINARIA SAS (MACHINERY PARK)	I need to process the certification.		The certification process is detailed in Section 8 of the Protocol.
13	CEMENTOS ARGOS SA	COMMENT 1 - The collection is a previous step for the process of advantage taking of materials (reuse, recycling, co - processing or recovery), therefore, we consider that this stage should not be taken into account for the generation of bonuses because it could result in double counting. Additionally, we suggest including the coprocessing process separately for the justification	COMMENT 1 Page 12 - "The amount of circular economy Credits generated must be supported by evidence that shows that the material reduction and recirculation activity (collection, reuse, recycling or recovery) was carried out."	collection activity is included, only when the subsequent recirculation of the material is guaranteed. In the definitions of the activities in section 4.2.2.2. This activity is defined as: "removal of materials (waste) that have been discarded, with the purpose of taking advantage of or valuing them. Includes actions of community





Nope.	Entity /	Text/Comment	Protocol	Response
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		given in COMMENT We suggest writing it as follows: The amount of Circular Economy Credits generated must be supported by evidence that demonstrates that the material reduction and recirculation activity (reuse, recycling, co-processing or) was carried out.		collection of materials, formal and informal activities of collection of materials, and development of public, private, community or mixed infrastructure for the collection, classification and readiness of materials that guarantees their recirculation" specifying that their readiness must be guaranteed for recirculation, would not fall into double counting since in a project the numbers by activity must be presented and a project that has previously been presented with this or another activity would not be eligible for credit generation. The non-double accounting procedures will be detailed in the collection methodology and





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•	Organization		Section	•
				therefore its correct application will be evaluated by the VVB and the programme.
14		COMMENT 2 – Taking into account the justification of the previous comment, we suggest eliminating the collection process as a recirculation activity since it is a previous step.	COMMENT 2 - page 18 4.2.2.2 Material recirculation activities.	I do not think it is necessary to remove this activity because many organizations do not have the capacity to do recycling as such, which is why enlistment is included within the definition of activity.
15		COMMENT 3 – We suggest the following aside: Co -processing: Use of appropriately designed materials in manufacturing processes with the purpose of recovering energy and resources and consequently reducing the use of fuels and raw materials used through their substitution. (Taken from the Basel Convention. Technical guidelines on the environmentally sound co -	clean COMMENT 3 - Page 19 4.2.2.2 Materials recirculation activities - We do not find within the recirculation activities the Co-processing process that is indicated in the Basel Convention, we kindly request that it be included as a separate recirculation activity since it is widely found	By extension, the definition of the recovery activity includes the energy recovery of waste, which would include the co - processing activity; the protocol specifies: "energy recovery of waste that is not recyclable and cannot be used in any of the activities mentioned above". Quantification methodology for this type of activity is yet to be developed, co -





Nope.	Entity /	Text/Comment	Protocol	Response
	Organization		Section	·
		processing of hazardous waste in cement kilns)	legislated in our Colombian regulations.	processing and its applicability conditions will remain within its scope.
16		COMMENT 4 - Likewise, we consider that in the wording of the definition when it is mentioned: These can be used again to produce resins of the same quality from the virgin raw material, or used as fuel or raw material for other products . *The word used should be modified to "transform into" (since the use already enters as advantage taking, which is the next chapter)	COMMENT 4 - Page 23 Chemical Recycling- We consider that the Use of the recovered materials as raw material for the industry or as fuel to drive vehicles and others; It is about energy use, which is the next chapter.	The comment is accepted.
17		COMMENT 5 - Given that the use of alternative fuels from waste in the cement industry is a use of both energy and raw material, and waste is not generated, we recommend generating an independent element for this process, according to the definition of the Basel Convention.	COMMENT 5 - Page 25 numeral 4.3.1.3 Energy recovery of plastic waste -	The quantification methodology for this type of activity is yet to be developed, co-processing and its applicability conditions will remain within its scope.





Nope.	Entity /	Text/Comment	Protocol	Response
	Organization		Section	
18		COMMENT 6 - page 25 4.3.1.3 Energy recovery of plastic waste -	COMMENT 6 - Energy use in steam boilers is mentioned, keep in mind that this activity is not legislated on issues of emission control for the use of waste in this process, therefore, it is suggested that baselines be considered contemplating measurement of other contaminants that could be generated in the combustion process dioxins and furans, HCI, HS, heavy metals in its	There is still no methodology for this activity, in the methodology to be developed the applicability conditions were taken into account to be able to carry out this type of activity.
19	Funcamino Guardians of life	Thanks for the training	process.	Thanks for the comment.
20	N/A	Excellent what you do. Thank you		Thanks for the comment.
21	Pedagogical and Technological University of Colombia uptc	I want more information		Thanks for the comment.





Nope.	Entity /	Text/Comment	Protocol	Response
	Organization		Section	
22	SKIPLAST	Good morning, the comment that I want to make reference to is the need to emphasize the change in the paradigm of consumerism and planned obsolescence of the industrial sector, where the common benefit and environmental protection are strengthened, over the particular benefit of a few private companies. That is to say, create strategies to return to trade, (for some cases), change the mentality of those who have economic power, have political and social power, for the alternative that ancestral knowledge and knowledge humanity is very decomposed For money, greed and sumptuous and superfluous luxuries come first, which harm children and young, making them empty people, without values, without feelings etc	Section	Thanks for the comment.





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·	Organization		Section	•
23	Morris and Associates SAS	Good morning, isn't there a Spanish version?		The document in public consultation was available in Spanish and English.
24	BIOFIX CONSULTING SAS	First of all, the protocol has seemed robust to me in defining the structure for the application of the VPCE and CEC in Colombia. The following observations are more associated with specific questions and not about the formulation of the protocol 1. Establish in depth which actions would be considered additional and how the issue of retroactivity in relation to them would be handled 2. What are the types of initiatives that would generate an incompatible overlap in the areas where it is desired to implement the VPCE 3. The document focuses		English. We answer your questions: 1. In the protocol we define that each project must justify additionality according to its principles. In addition, the conditions for additionality will be specifically defined in the methodology that is developed for each type of activity. Regarding retroactivity, the protocol and the future procedure document define these conditions on time. 2. It depends a lot on the initiative, for example, a collection initiative could overlap with a recycling one. 3. Yes, in fact, in
		mainly on the		the document





Nope.	Entity /	Text/Comment	Protocol	Response
	Organization		Section	
		handling and		we talk about
		identification of		materials in all
		plastics. Will cans,		activities, since
		glass, cardboard		we understand
		and other usable		that credits can
		materials be viable		be generated
		for quantification for		from any
		the CECs?		material and this
				will be reflected
		4. How the		in the credit
		market would		serial number.
		develop around the		On the other
		CECs and what		hand, the
		benefits would it		variables to be
		bring to the buyers		considered will
		of said credits.		be defined in
		E		the specific
		5. I consider		methodology for
		expanding the		the activity
		definitions of activities to be		carried out. 4. The benefit is to
				be able to
		developed, including possible alternatives		
		in the event that		compensate your material
		population		footprint, in
		communities wish to		addition, to
		participate in the		improve
		programme and not		reputational
		only spaces where		conditions
		the areas are		associated with
		controlled and		waste
		administratively		management.
		delimited more		Regarding the
		easily, such as		market, there
		organizations,		are already
		companies. Even if it		international
		is increasing the		examples of
		permanence and		plastic credits
		risk discounts as		and transactions
		they are spaces		of these by
		(indigenous		organizations
		reservations,		with an interest





Nope.	Entity / Organization	Text/Comment	Protocol Section	Response
		villages, communities) with possible difficulties in obtaining figures at the beginning of the VPCE		in compensating. 5. In the definition it is clear that any organization can present a PCEM.