## IWSFG Template for reviewer comments and IWSFG secretariat observation

Document reviewed: **PAS 1**

Due date:2017//

1 Te=Technical, Ge=General, Ed=Editorial

| Initial | Starting Line Number (e.g. 17) | Ending Line Number (e.g. 23) | Clause/ Subclause (e.g. 3.1) | Type of comment[1] | Comments | Proposed change | Observation of the secretariat |
|---|---|---|---|---|---|---|---|
| SB | 207 | 210 | 7.1.3 | 1 | Reg. Cellulose is made of wood pulp. The cellulose obtained from wood consists of the same natural polymer found in natural cellulose (e.g. cotton).<br>In fibres made of reg. Cellulose the cellulose adopts to the crystal structure cellulose II, which has a different orientation and benefits from their higher accessibility to water and microorganisms leading to full bio-degradation, at a rate comparable or higher to cotton.<br>Biodegradability of regenerated cellulose has be proven according to various standards in solid and liquid systems (e.g. DIN EN 13432:2000-12, ASTM 7081). The biodisintegration test (7.5, FG 506) prooves the biodegradability of regenerated cellulose.<br>Cellulose is a natural molecule that is found in all plant based life in the ocean. | Regenerated cellulosed to be treated as wood pulp. | |
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