



ISO/TC 59/SC 13

Organization and digitization of information about buildings and civil engineering works,  
including building information modelling (BIM)

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Secretariat: SN (Norway)

**WG 13 responses to collated comments received on ISO CD 19650-5**

Document type: Other committee document

Date of document: 2019-04-30

Expected action: INFO

Background: Dear all,  
Please find enclosed WG 13 responses to collated comments received on ISO CD 19650-5.  
According to the CD ballot result the project will proceed to the enquiry stage, see document N 691.

Committee URL: <https://isotc.iso.org/livelink/livelink/open/tc59sc13>



ISO/TC 59/SC 13/WG 13

Implementation of collaborative working over the asset lifecycle

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Convenorship: BSI (United Kingdom)

**ISO/TC 59/SC 13/WG 13 responses to collated comments received on ISO CD 19650-5**

Document type: Other committee document

Date of document: 2019-03-25

Expected action: INFO

Background:

Committee URL: <https://isotc.iso.org/livelink/livelink/open/tc59sc13wg13>

## Template for comments and secretariat observations

Date:2019-03-06

Document: : ISO/TC 59/SC 13/WG  
13 N 123

Project: ISO 19650-5 CD

MB/ NC <sup>1</sup>	Line number	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Observations of the secretariat
SE 001				ge	This document should not be a standard; possibly a technical report, preferably a national handbook.	Don't make this document a standard.	Already approved as a standard
AU	All pages			ed	All headers and footers to be updated	All headers and footers to be updated to ISO 19650-5	Accepted – will amend
DE 002				ge	The “organisation” (e.g. in chapter 6) should be defined more clearly in ISO 19650 Part 5, because it is important to know precisely who sets the safety requirements.	The building owner shall define information security standards in accordance to ISO/IEC 27001 and ISO/IEC 27002.	Not accepted. Application of ISO 27001 is not always appropriate and is not applicable in collaboration between organisations (explanation is provided in the introduction)
DE 003				ge	If ISO 19650 Part 5 is fully applied, BIM would not be actionable.		Not accepted. It is possible to implement Part 5 in a BIM project. This has been demonstrated in the UK.
DE 004				ge	Not all accepted comments of document <i>ISO/TC 59/SC 13/WG 13 N 106</i> have been incorporated. Therefore, a final evaluation of the draft is not possible.	Include all accepted comments.	Only 4 minor comments identified – see “ISO_WD_19650-5_Collated Comments – agreed comments 17-10-2018 missed in CD”
AU	2	Introduction	1	Ge	The term ‘digital engineering’ does not appear to have been used in earlier 19650 series documents, or in PAS1192-5. It appears that “digital engineering” is used within this document as a synonym for building information modelling.	Replace ‘digital engineering’ with building information modelling (BIM) to appropriately align with document title and scope	Digital engineering encompasses BIM, asset management and wider processes which are converging with BIM.
AU	2	Introduction	4	Ed	Wrong use of grammar: “address <b>the</b> inherent vulnerability issues”	Delete “the”	Accepted – will amend
AU	3	Introduction	4	Ed	Choice of words: “implications that arise, whether <b>to</b> built environments”	Replace “to” with “ <b>for</b> ”	Accepted – will amend

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<sup>2</sup> **Type of comment:** **ge** = general **te** = technical **ed** = editorial

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AU	3	Introduction	5	Ed	Wrong use of grammar: “benefits that <b>these</b> ” This would be appropriate if the statement was preceded by a technology reference list.	Delete “these”	Accepted – will amend
AU	4	Introduction	5	Ed	Choice of words: “digital technologies and <b>ways of working</b> ”.	Replace ‘ways of working’ with “ <b>collaborative work methods</b> ”	Accepted – will amend
AU	1	Introduction	6	Ge	Refer to above Australian comment on digital engineering and BIM.	Replace ‘digital engineering’ with ‘building information modelling’.	Not accepted – Digital engineering encompasses BIM, asset management and wider processes which are converging with BIM.
AU	3	Introduction	8	Ed	Choice of words: “[services] provided by or <b>from</b> them [assets]”. Service provided by an asset makes sense. Service provided from an asset is less clear. Service provided through an asset is better?	Replace “from” with “ <b>through</b> ”	Will amend to by, from or through
GB 005		01	1	Te	The scope of this standard is to specify requirements as well as principles.	Insert “and requirements” after “principles” in line 1.	Accepted – will add
AU	2, 3	1.0	1	Te	“at a <b>stage</b> of maturity described as “building information modelling (BIM) according to ISO 19650”  This implies, other stages of maturity are known - nowhere else in this document are these identified.	Remove ‘at a stage of maturity described as’, and replace with ‘using’. Remove ‘according to ISO 19650’. Remove quotation marks.	Not accepted – but needs amending to reflect text in part 1 - “at a stage of maturity described as “building information modelling (BIM) according to the ISO 19650 series”
AU		1.0	2 <sup>nd</sup> paragraph	Ge	Consider the need to refer to ‘within and across’ as this is inferred by stating either individually.	It addresses the steps required to create and cultivate an appropriate and proportionate security mindset and culture <b>across</b> organizations with access to that information, including the need to monitor and audit compliance.	Accepted – will amend
AU		1.0	4 <sup>th</sup> paragraph	Ge	Consider the need for the comma at the end of ‘as	Remove comma: ‘...as well as the provision of	Not accepted – within the

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					well as the provision of services, within the built environment.'	services within the built environment.'	built environment refers to more than just the provision of services
AU	2	1.0	4	Ge	Missing the word 'related' between "and" and "technologies" in: "...involved in the use of [building information modelling] and ___ technologies in the creation..."	Insert " <b>related</b> " between "and" and "technologies"	Accepted – will add
AU	1	1.0	4	Ge	Refer to above Australian comment on digital engineering and BIM.	Replace 'digital engineering' with 'building information modelling'.	Not accepted – Digital engineering encompasses BIM, asset management and wider processes which are converging with BIM.
GB 006	-	02	-	te	ISO19650-3 not listed	ISO 19650-3 needs to be included in normative text (4.2?) and then referenced accordingly	Accepted – will add
AU	1	3.0	1 <sup>st</sup> sentence	Ge	The first sentence should end with a colon, however the second sentence ends with a colon.	Replace first sentence with "For the purposes of this document, the terms and definitions listed within this section apply."	Not accepted – this is standard ISO text.
AU		3.0		Te	Missing key terms	Consider adding the following terms to the list and reorder the section numbers accordingly: "Breach" "Incident" "Top-level management" "Residual risk" "Information set" Definitions TBC by TF01.	Security breach to be defined using existing ISO definition Security incident to be defined according to ISO 20858: 2007 Clause 2.12 Top management already defined Residual risk – to be defined using ISO definition "risk remaining after risk control measures have been taken" – need to find correct ISO to reference Information set – to be

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							removed by later comment
JP-1 007		03.01		te	The concept “complex” should be added to the definition of asset in accordance with ISO12006-2. Construction complex is an aggregate of one or more construction entities.	Rephrase e.g. Item, thing, entity or complex	Not accepted – definition from ISO 55000 to be used
AU	2	3.5	1	Ed	It is key to recognise that organisations also make choices to accept certain risk levels and make ample provision for these	Risk appetite: amount and type of risk that an organisation is willing to <b>accept</b> , pursue or retain	Not accepted – definition as currently written consistent with use in other ISOs
AU		3.6		ed	Spelling mistake	Relative freedom <b>from</b> threat or harm	Accepted – will amend
CL 008		03.06	-	ed	“the state of relative freedom form threat...”	“the state of relative freedom from threat ...”	(Duplicate) Accepted – will amend
AU	2	3.9	1	Ed	Grammar could be improved	Reword to: 'Information: the loss, misuse, modification or unauthorised access of which could.'	Not accepted – is correct as currently written
JP-2 009		03.11		te	The definition is not good as top management is not a human but an activity. It should be changed.	e.g. to add the term “an activity of” in front of the current definition	A number of existing definitions of management use phrase in the same context as in this draft. Will add note about management being the function not the activity.
GB 010	-	04	-	te	Triage process not included in this section. It was a sensible and logical tool which helped asset owners when applied.	Introduce the triage process with accompanying diagrammatic guidance.	Accepted – will add
AU		4.1.1		ed	Missing comma after ‘creating’	... organization creating, managing, .....	Accepted – will add
JP-3 011		04.01.2 All over the documentn	NOTE	ed	The tern “NOTE” shall be changed to “Note”. So many mistyped “NOTE”s in this document shall be change to “Note”s.		Not accepted - ‘NOTE’ is used in published versions ISO 19650-1 and 2

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AU	4.2.2	d)	Ge/ed		Opportunity to add 'Heritage site'	'...a landmark, heritage site, ...'	Not accepted – not likely sensitive unless it is already designated as a landmark, nationally significant site or crowded place
AU	4.2.4		Ge/ed		Of instead of or	Privacy 'of' individuals or communities...	Accepted – will amend
AU	4.2.5		ge		What constitutes as appropriate security advisors?	Maybe worth adding a NOTE as an example.	Not accepted – any example is unlikely to be apply internationally
AU	4.5.2	f)	ge		Opportunity to add f)	A breach of security.	Not accepted – a security breach doesn't impact on whether an asset is sensitive or not
GB 012	04.07	1	Te		This clause needs to include a statement to the effect that if no business benefits are identified then no further application of ISO 19650-5 is required.	Add 2 <sup>nd</sup> sentence: "If no business benefits are identified then clauses 5 to 10 are not applicable."	Accepted – will add
AU	5.1.1	a)	Ge/ed		Consider a broader scale to point a), covering structure and strategy, referred to together as the 'approach'.	"creating the required governance structure <b>and strategy</b> , ensuring... the relationship of this <b>approach</b> with the relevant..."	Not accepted – the strategy is dealt with in Clause 6
AU	2	5.1.2	Point a)	Ge	Remove 'and' from 'communications technologies and relevant to the initiative'	Communications technologies relevant to the initiative.	Accepted – will amend
GB 013	05.01.2		ed		... shall define the individual(s)... Individuals are likely to change during projects or asset operations.	5.1.2 remove individual and change responsibility to responsibilities for 5.1.3 should be activities Note – function should be activities	Accepted – will amend and add "the activities listed in 5.1.2"
AU	5.1.4		ed		'to be undertaken' is redundant in the phrase 'to be delegated to be undertaken'. When a task or duty is delegated, it is implicit that it will be undertaken by the party to which it is delegated. Remove 'to be	'It shall be acceptable for ... duties to be delegated on a day-to-day basis'	Accepted – will amend

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					undertaken'.		
AU		5.2.1		ed	Missing 'As'	Developed as early <b>as</b> possible.....	Accepted – will amend
DE 014		06.01		ed	A reference to the existing ISO 31000 ('Risk management') is missing.	Reference to the existing standard ISO 31000 should be supplemented.	Add note after 6.1.1 referring ISO 31000 and will add to bibliography
AU		6.2.1	Note 2	Ge	Opportunity to give an example	Use the same risk scoring approach – Give an example	Not accepted – this is too organisational-specific and will reference ISO 31000
AU	14	6.4.3		Ge	6.4.3 seems to be mostly a repetition of 6.4.1 but could be improved to state that risks should be ranked.	Replace with 'The organization(s) shall rank the residual risks and indicate whether each residual risk is tolerable.'	This is not a repetition. Amend to 'The organization(s) shall document the tolerated security risks.'
AU	1	6.5.3	1 <sup>st</sup> paragraph	Ge	Suggest amendment to '...impact on existing appointments of significant changes' for readability.	Reviews shall take into consideration the potential impact on existing appointments likely to be affected by significant changes to the mitigation measures...	Accepted – will amend
AU	5	7.1.1	NOTE	Ge	No need for 'the' in 'the other security and...' No need for second 'other' in statement	The security management should, where appropriate, be cross-referenced to other security and management policies and plans which the organization(s) has in place.	Accepted – will amend
AU		7.1.1		ge	Add word <b>relevant</b>	<i>NOTE The security management should, where appropriate, be cross-referenced to the other security and other <b>relevant</b> management policies and plans which the organization(s) has in place.</i>	Accepted – will add
AU	1	7.1.2	Point f)	Ge	Suggest 'for' be replaced with 'of'	Details of accountability and responsibility for the implementation of the different aspects of the security management plan (see7.4)	Accepted – will amend
GB		07.01.2		ge	The plan does not recommend a testing procedure	Include a testing regime such as Penetration testing	Accepted – will add

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015					that may be needed to demonstrate its effectiveness.	of IT systems and/or attempts to circumvent physical security restrictions e.g. tailgating, bypassing security systems...	
GB 016		07.02.1		Te	Please avoid the term “information set” – this was a rejected proposal from Sweden in 19650-1 as a replacement for information model.	Replace “information set or model” with “information model or part thereof”.	Accepted – will amend
GB 017		07.02.1, 7.2.3		Te	Avoid using the term “model” on its own. ISO 19650-1 defines the term “information model”.	7.2.1 – see DC 04 7.2.3 – replace “data/information or model” with “information model in whole or in part”.	Accepted – will amend
GB 018		07.03.2.a		ed	...limited to a number of specialist contractors	7.3.1 NOTE – just have ‘specialist’ 7.3.2 a Change ‘specialist’ to ‘genuine need to access’	Accepted – will amend
GB 019		07.05.1.b		ed	the compliance of any supply chain	Change supply chain to delivery team – check use of supplier and supply chain throughout document	Accepted – will amend
AU	1	9.1.2	1	Ge	Contracts that require destruction or deletion of data are problematic in a legal and digital context. Many parties are required to retain full records for insurance and QA purposes.  Furthermore, in the digital age, deleting and/or destruction of data is difficult given measures taken (backup systems, archives) to prevent data loss. Data is frequently stored in multiple locations, on multiple systems, with multiple versions.  The standard should anticipate circumstances where data may be retained, but in a secure	Provide an option for secure retention / archiving of data. Restrict or suspend the use of the data.  E.g. The data sharing agreement, or equivalent shall include the organization(s) requirements for the secure retention or deletion and/or destruction of sensitive data.	Accepted – will amend

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					manner appropriate to the situation.  This appears to be the approach suggested in 9.4.1.		
AU	1	9.1.3	1	Ge	Use of the term 'ensure' should be avoided, as this may raise obligations above a normal standard of care.	Replace the first instance of 'ensure' with 'implement'	Accepted – will amend
GB 020		09.02.2		ge	... to be retained at senior levels within the supply chain...  - is it project or organisational seniority that is needed and how can this be verified e.g. what responsibility must this level carry?	Replace 'senior' with 'accountable'	Accepted – will amend
GB 021		09.04		ed	use of 'return(ed)'. Returned implies that there was a lack of possession by the original owner. Use of delivered is preferred and better aligned to ISO 19650-1/2	change to 'delivered'.	Accepted – will amend
AU	1,2,3	9.4.1	1	Te	Merely stipulating the destruction of information and models - especially where these have been digitally distributed – is inadequate.	To attain the goal set forth here, it may be useful to determine, in the first instance, the platform where data/information is created and/or shared. For instance, Clients' Common Data Environments.  Clarify what destruction of digital information involves. Add requirement to understand where the information was saved or shared to.	Accepted – will add note to take into consideration that an organisation may have shared information down its own supply chain. Contractual requirements should be passed down the supply chain.
GB 022		09.04.3		ge	There is no reference to potential data retention obligations on behalf of appointed parties? These will be 6 years underhand or 12 years under seal/deed.  Similarly the CDE archive state may be needed to defend the appointed parties under any action during the retention period.	Add appropriate text to 9.4.1	Accepted – will add
AU	1	10	1	Ge	As worded, may force parties to obtain legal advice, where advice could be sought from other sources or advisors.	Remove the word 'legal'.	Accepted – will amend

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AU		A.2	d)	ed	Possibly too many 'and's' and use comma	Computing, electronic devices and equipment.	Accepted – will amend
JP-4 023		Annex B	B.1.1 e)	te	The phrase “data protection” still remain as it is although the term “data” has been removed from other part of the document. If it cannot be changed to “information protection”, then the reason should be noted clearly.	To be discussed	See agreement to 5 <sup>th</sup> comment in this list
JP-5 024		Annex B	B.1.1 g) and i)	te	As above		See agreement to 5 <sup>th</sup> comment in this list
AU		B2		Ge	Should this clause (personal data breaches and intolerable risks) be in the main body of the standard (clause 7.2) rather than this informative annex, and as 'shall' instead of 'should'?	Move to clause 7.2 and replace 'should' with 'shall'	No – don't think this makes sense in 7.2 as it refers to actions conducted as part of the assessment process described in the clauses immediately above in Annex B
AU		B2		Ed	Match appendix sub-heading title style to B3 and B4. B2 is missing from contents.	Fix formatting	Accepted – will amend (should be B.1.2)
JP-6 025		Annex C	C.1.2 e)	te	As above		See agreement to 5 <sup>th</sup> comment in this list
AU		C1.2	a)	ge	Remove <b>or purposes</b> for clarity	the purpose(s) of the sharing;	Accepted – will amend
AU		C1.2	e)	ge	Restructure for clarity	data protection, <b>where relevant</b>	Accepted – will amend
GB 026		c.1.02		ge	The agreement list is missing a user management statement.	Add bullet point to C.1.2 and look at adding text on user management in normative text alongside information management text	Accepted – will add a bullet point to C.1.2 but will not include in the normative text
AU		C1.3	a) & b)	ge	Allow for mitigation actions as another option, rather than only suspension or termination dependant on breach that can be set out in the plan.	Add new bullet point offering mitigation actions as an alternative to suspension or termination.	Not accepted – suspension should occur until remedial (mitigation) measures have been implemented

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AU	1	C1.3	a)	Ge	<p>Should an option be included to cease <b>the sharing of data</b> with the specific organisations involved, rather than suspending the agreement itself? The agreement contains requirements that must remain in play while the breach is investigated.</p> <p>Noting that suspending data sharing may have significant flow-on implications (e.g. Delay) for other parties, any suspension should be carefully considered by relevant parties. Suspension should be targeted rather than broad.</p>	<p>Either: Add a new point before what is currently point (a): <b>'notify the party(ies) of a restriction to the sharing of information which will remain in place</b> until the event or concerns have been investigated and any remedial measures have been agreed and implemented. To avoid unnecessary delays, the imposed restriction should be proportionate to the level of risk, and targeted to mitigate the actual or potential breach without unnecessarily shutting down risk-free information sharing.'</p> <p>Or: Amend point (a) to something like the above.</p>	<p>Not accepted – agreement should be suspended until such time as an investigation has been undertaken.</p> <p>However, will add similar text around conducting this exercise without unnecessary delay.</p>
AU	1	C1.3	b)	Ge	<p>Shouldn't the agreement have terms that support the termination of data sharing? These agreements frequently extend beyond the conclusion of the project or works in question.</p>	<p>'terminate the information sharing agreement and, <b>where appropriate</b>, require purging of ...'</p>	<p>Accepted – will add</p>
GB 027		General		Ed	<p>Notes are not permitted to include may, might, should. ISO insist on statements of fact, or statements using 'can' to denote possibility.</p> <p>This was learned the hard way during the final editorial review of Parts 1 and 2 in Oct/Nov 2018.</p>	<p>Change all relevant verb forms in notes to 'can'.</p>	<p>Accepted – will amend</p>
GB 028		General		te	<p>The cross-references to ISO 19650-1, -2 and -3 are not obvious. This follows on from the removal of the references to security information requirements from the PAS, as without these specific cross-references it is unclear how this standard relates to the work of the other standards in the 19650 series.</p>	<p>Introduce a flowchart to put Part 5 into the context of the other 19650 standards and introduce specific cross references in the relevant clauses (clause 7? Clause 9?) pointing to e.g. development of OIR/PIR in Part 1, EIR/AIR in Parts 2 &amp; 3).</p>	<p>Accepted – will add</p>
GB 029	-	Introduction	-	ge	<p>Section may perhaps benefit from a better explanation of the security context through the concepts/first principles of typical Security Issues (PAS1192-5, 4.2) and a Holistic Approach to Security (PAS1192-5, 4.3) including diagrams.</p>	<p>Add Annex to cover this</p>	<p>Accepted – will add</p>

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GB 030		n/a	Overall	te	Greater emphasis is needed on information management aspects. e.g.: <ul style="list-style-type: none"> <li>. Built Asset Security Information Requirements</li> <li>. Built Asset Security Manager</li> <li>. CDE considerations</li> <li>. Reference to EIR interfaces</li> <li>. Reference to BEP interfaces</li> </ul>	Review references to information management	Accepted – will review introduction to include more reference to BIM as well as the Triage process and its pragmatic approach. Will have a conference call of authors and convenor to finalise this issue
GB 031		n/a	Overall	ed	Use of 'top-level management'  While 'top management' is included in clause 3, top level management is used within the next.	Change to 'top management' throughout. Review definition and notes in ISO 55000	Accepted – will amend Include note 1 from definition in ISO 55000 plus note from earlier comment around function
GB 032		n/a	Overall	ed	Overall, terms like 'breach', 'residual risk', and 'risk' are used within and without a security prefix. These terms should be consistent, or given clear definitions if these subtleties are intentional	Review and amend appropriately	Accepted – will amend

ISO\_CD 19650-5\_BSI.doc: Collation successful

ISO\_CD 19650-5\_DIN.doc: Collation successful

ISO\_CD 19650-5\_INN.doc: Collation successful

ISO\_CD 19650-5\_JISC.docx: Collation successful

ISO\_CD 19650-5\_SIS.doc: Collation successful

Collation of files was successful. Number of collated files: 5

SELECTED (number of files): 5

PASSED TEST (number of files conformed to CCT table model): 5

<sup>1</sup> **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 \*\*)

<sup>2</sup> **Type of comment:** **ge** = general **te** = technical **ed** = editorial

**Template for comments and secretariat observations**

Date:2019-03-06	Document: : ISO/TC 59/SC 13/WG 13 N 123	Project: ISO 19650-5 CD
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MB/ NC <sup>1</sup>	Line number	Clause/ Subclause	Paragraph/ Figure/Table	Type of comment <sup>2</sup>	Comments	Proposed change	Observations of the secretariat
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FAILED TEST (number of files conformed to CCT table model): 0

CCT - Version 2018.2

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ISO/TC 59/SC 13/WG 13

Implementation of collaborative working over the asset lifecycle

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Convenorship: BSI (United Kingdom)

**ISO/TC 59/SC 13/WG 13 responses to collated comments not addressed on ISO WD 19650-5**

Document type: Other committee document

Date of document: 2019-03-25

Expected action: INFO

Background:

Committee URL: <https://isotc.iso.org/livelink/livelink/open/tc59sc13wg13>

## Template for comments and secretariat observations

Date: 2019-03-06	Document: <b>Document: ISO/TC59/SC13/WG13 N122</b>	Project: ISO-WD 19650-5 Missed comments
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MB/ NC <sup>1</sup>	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment <sup>2</sup>	Comments	Proposed change	Observations of the secretariat
CH				ge	Data is used as synonym for information, in general information should be used as generic description for interpreted data	Use information instead of data, see also DIS ISO 19650-1, -2	Will change these additional uses of data (personal data and data protection) to information  Also has not been removed from definition of 'need-to-know' – will amend
CH		Introduction		ge	sentence is to generic:  Initiatives or projects that are developing new assets or solutions, or modifying or managing existing ones, will become much more collaborative in nature.	Initiatives or projects that are developing new assets or solutions, or modifying or managing existing ones, must become much more collaborative in nature to increase effectivity and efficiency.	Missed in last update
AU		Foreword	6 <sup>th</sup> para	ed	Incorrect title for SC 13.	Amend to: Organization and digitization of information about buildings and civil engineering works, including building information modelling (BIM)	Missed on title page
AU		8.5.4	1 <sup>st</sup> para	ed	If considered necessary, a reciprocal requirement to update the record of the security assessment process described in Clause 4.6 could be added to this clause about the review of the security breach/incident management plan.	Amend text to: The occurrence of each review shall be recorded and retained in the Security Assessment Report.	Missed adding "as part of the security breach/incident management plan" in last update

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