

# Responsible Down Standard International Working Group

## Parent Farms

April 5, 2018

### Introduction

1. Introductions and Housekeeping
2. Parent Farm Proposed Changes

### Parent Farms

#### Parent Farms - optional

- Parent Farms  
All Parent Farms that are to be a direct source of RDS down shall be certified to comply with the requirements for farm, as noted above.
- Optional Parent Farm Certification  
*Brands, slaughterhouses, hatcheries or other supply chain members may elect to apply the RDS to parent farms, even though this is not required by the standard. The procedures for doing so have been outlined in optional Module 6, Parent Farm Certification Module.*

#### Parent Farms – Goals

1. Establish a method to assess the risk of live-plucking in the parent farms of a supply chain.
2. Set up observation criteria based on the risk level: high – more observation, medium – less observation, and low – little to no observation.
3. Keep the option for full parent farm certification, with labeling and communication options for brands.
4. Collect data to support and improve the risk assessment with each revision of the standard.
5. Set a target to require certification of medium to high risk Parent Farms.

*Views in the International Working Group are split; one view – live plucking is not a common issue on Parent Farms and one view – it is happening and on a broad scale.*

*Do we have general agreement on these goals?*

*These would be newly established goals.*

**Comment:** *From an Animal Welfare viewpoint, we have always been concerned about the Parent Farms and geese. Our hope would be to be a little more ambitious at this time. The standard was released in 2014, so we have had a few years and I was wondering whether there has been information collected that we can use. So that we can make sure our goals are a little more ambitious. Also setting a target from medium to high, what do we mean by “target”?*

*The focus in this revision is improved data collection and risk assessment. In later versions of the standard, do we want to include Parent Farm certification?*

*We should use the data that is collected to make that determination.*

**Comment:** *Would High risk result in an audit? We are not really proposing that at this stage. There is not a lot of hard data on how widespread live plucking is.*

## Risk Assessment

### Risk Levels

- High: Evidence that live-plucking may happen
- Medium: Suspicion that live-plucking may happen
- Low: No evidence or suspicion that live-plucking may happen

### Risk Factors

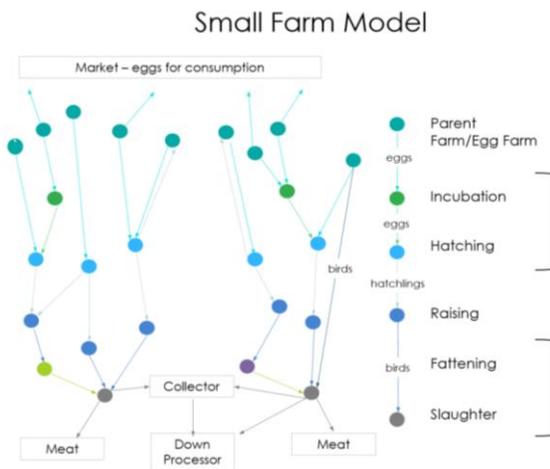
- Species
  - Low Risk
    - Almost all duck
  - Medium Risk
    - Goose
  - High Risk
    - Wanaxi goose
    - Shitou goose
    - White goose
  - Average age of slaughter (over 8 weeks will be when they are able to be live-plucked)
- Geography:
  - High Risk
    - Poland
    - Hungary
    - China (specific regions)
- Previous audit or investigation results (Four Paws, IDFL, TDS)
- High fill power

## Supply Chains

*We still need to determine how these pieces fit together in this version of the standard, but another component to consider is the model of the supply chain from the parent farm to the point of slaughter.*

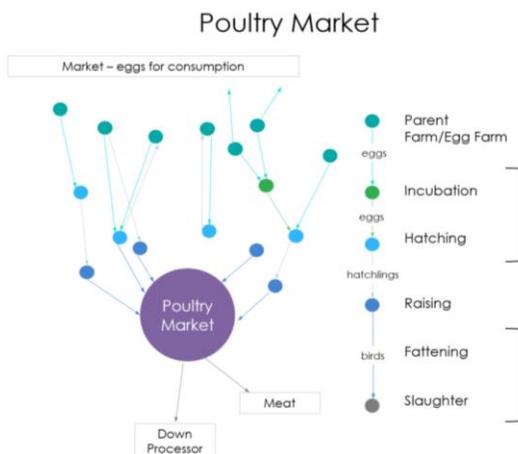
### Small Farm Model:

*This model is common in China, Romania, Ukraine, Korea. From Parent Farm to slaughter they are all independent. There is not a lot of consistency between the different players and then the level of documentation or traceability varies widely. In some cases, there is more traceability, especially when they are geographically limited by what is around them. In other cases, there is limited traceability. Identifying the Parent Farms in this model is very challenging so whatever system we have is going to have to take into account that reduced level of traceability.*



### Poultry Market:

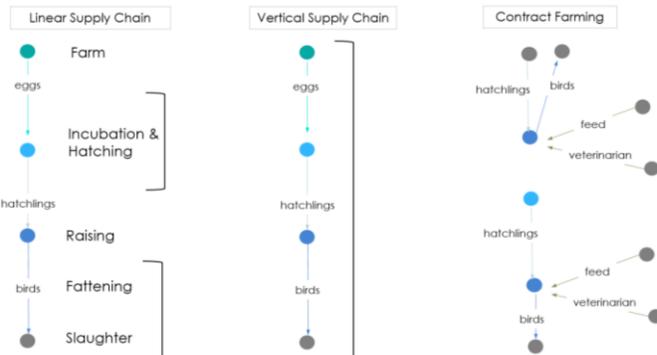
*There is a large poultry market where farmers bring their birds in and these raising farms might have 500 birds. We do not have a certification model that would work for these.*



## Large Farm Models:

There is some variation in these larger farm models. You may have a completely vertical supply chain. What is typical is for the raising farms to be contracted. That is common in the U.S. and China. In the linear supply chain, you may have sections that are owned by the same entity. They generally go to the same slaughterhouse every year and may or may not be able to identify the parent farms. This is another piece where we do not know how it is going to fit with the risk model but it is more information and we want to capture it.

### Large Farm Models



We will be able to do audits or checks sooner with vertical supply chains where the slaughterhouse owns the parent farms and it is clear where they are. I think one thing that we need to keep in mind is ensure the standard does not put a higher burden on the companies that know their parent farms. Keeping in mind the pricing structures for this and how the data collection is paid for and make sure we are not assigning a higher cost to companies that have better visibility.

**Comment:** The situation is real that there is known live plucking happening on some of these farms. So maybe this could be something where the brands ask for more transparency from their suppliers. Perhaps we could give the question more to the brands. The RDS offers many safeguards but this could be a risk factor.

**Comment:** I do not know if making Parent Farm Certification optional incentivizes the right action. There may be supply chains that it is doable and others where it is not. This is a clear risk and we need to take steps to reduce this risk. I think it is important that it is included in some ways in the revision, even if it is just starting with data collection so we can better understand the situation. To us it is critical.

**Comment:** Per the previous comment, I would be open to creating a standardized letter that we can each send to our suppliers letting them know we do not want these activities in our supply chain. If we all send the same letter, hopefully it is more affective.

**Comment:** The way it works for us is we directly talk to suppliers and we ask them to source from linear or industrial supply chains. While we do not currently require RDS we would like to see the RDS have traceability to verify and that certification for Parent Farms be a requirement.

**Comment:** From another brand perspective the more traceability, we have the better. If it is starting data collection, we have to start somewhere. From a brand perspective, more traceability cannot be a bad thing. We would be on board with that.

How does it look in terms of incentive to drive traceability? What kind of incentives do we need to create? How does the RDS work so that we can influence all of these supply chain models? I think having increased data collection will help us do that.

**Comment:** Driving incentive would be brands letting their supply chain know about the risk. Perhaps a solution is if we know in the market that 10 parent farms are supplying this market one solution could be that audits take place in those farms or a percentage of those farms. It would not necessarily be a punishment because they are not certified to RDS. Brands want more security; they do not want this reputational risk. Maybe it cannot be mandatory, but maybe we can define the steps. Work around possible ideas for the contract farming model.

**Comment:** Could the RDS work to push towards industrial farms in order to increase traceability?

If we have some of these less linear farms then they may themselves have good animal welfare. Therefore, it would be a shame to distort the market by giving an incentive to exclude them when in fact we may not be addressing a risk that is actually there.

**Comment:** Especially in the small farm model, the animal welfare is actually quite nice and if we drive more to the industrial farms the more geese are kept in industrial farm the cheaper the audit will be but this doesn't mean the lifetime of these geese is better. If we put too strict limitations on which material can be certified then the overall quantity would be smaller.

**Comment:** Would you say that the collector-based systems are lower risk for live-plucking at the parent farm? Could we go forward with not excluding the collector-based systems but take more time with the solution for the collector based systems?

**Comment:** I think for the collector-based system it is lower. It is more difficult to know where those small households get the eggs from. Generally speaking, I would say the risk is lower.

## Data Collection

### Tools for Data Collection:

- Self-assessments, with an auditor check-in
- Checks by the scope certificate holder
- CB visit

### Data Points:

- Number of parent farms
- Location of parent farms
- Number of birds

- Species of birds
- Age of the birds at slaughter
- Culling or euthanasia practices
- Variation in parent farms from year to year
- How are eggs tracked through to the raising farm?
- Describe the chain of custody from parent farm to slaughterhouse

### **Risk-Based Visits:**

Risk Level	<i>The following requirements apply for Parent Farms based on the auditor's risk assessment.</i>
Level 1 – Low	<ul style="list-style-type: none"> <li>• Self-assessment completed.</li> <li>• Records of checks by the scope certificate holder (if applicable).</li> <li>• Confirmation visits at the <i>discretion</i> of the auditor.</li> </ul>
Level 2 – Medium	<ul style="list-style-type: none"> <li>• Self-assessment completed.</li> <li>• Records of checks by the scope certificate holder (if applicable).</li> <li>• Confirmation visits of a <i>sampling</i> of parent farms within a supply chain.</li> </ul>
Level 3 – High	<ul style="list-style-type: none"> <li>• Self-assessment completed.</li> <li>• Records of checks by the scope certificate holder (if applicable).</li> <li>• Confirmation visit of <i>high percentage</i> of all parent farms within a supply chain.</li> </ul>

### **Visits according to risk:**

**Comment:** *So this will be required for data collection for all supply chains?*

Yes.

*The remaining two questions are A. how do we handle this across different parent farm models, B. What do we do when we see live plucking? We don't really have suggestions for those yet.*

**Comment:** *From an animal welfare viewpoint; any parent farms that are live-plucking should then be excluded from the RDS. This creates a challenge when the purpose is data collection but it should also affect future decisions. If it were known in a certain supply chain that live plucking has happened that would mean for the next phase as to whether or not we will allow those supply chains to be certified. It is a reputational risk.*

*Our next steps would be to put this into a draft and then put it to a vote to make a decision.*

Thank you!