Responsible Down Standard
Terms of Reference

Updated, May 2018

Introduction

This document is intended to capture the will of the convened stakeholders regarding the Responsible Down Standard. This document will be used to guide the detailed revision of the Responsible Down Standard.

Goals

1. Ensure that down and feathers do not come from animals in a supply chain that have been subjected to any unnecessary harm.
2. Reward and influence the down and feather industry to incentivize practices that respect the humane treatment of ducks and geese.
3. Education and development of the supply chain in order to drive continuous improvement of best practices.
4. Provide companies with a tool to know what is in their products, and to make accurate claims.
5. Provide a tool for the industry to better understand animal welfare at the farm level.
6. Ensure strong chain of custody for certified materials as they move through the supply chain.

Scope

1. A global standard.
   - The standard is intended for application in any region where ducks and geese are raised, as well as any region where down and feather materials may be collected. The standard shall not include any criteria that de facto excludes any region.
   - Currently the standard is primarily being applied on farms in Europe and Asia.

2. From "hatchling to finished product."
   - Global supply chain from hatchling (24 hours or less) through to final garment assembly: raising farms, collectors, slaughter, processing, finished goods manufacturing, traders, transport
   - Parent Farms:
     - Parent farms will be audited when they are a source of down or feathers
     - All slaughterhouses will collect and report information on the source of eggs for RDS farms.
     - Textile Exchange will begin collecting data on parent farms to build a risk assessment for future versions of the Responsible Down Standard:

> size of the farms, species of waterfowl, tracking of eggs to the raising farms, and known regional reports of live-plucking or force-feeding.

3. Optional parent farm certification.
   - When parent farms are fully certified, the information will be tracked to the final product on the Transaction Certificate.
   - Brands or companies certifying to the parent farms may communicate this to their customers, using approved language.

4. Applicable for all supply chains.
   - Applicable for industrialized and small farm - collector based channels

5. Credible, controlled labeling
   - Only products with 100% certified down may use the logo on consumer-facing products.
   - Blended labeling may be used to allow brand-level public communication for overall volumes, and on B2B products and documents.
   - RDS may not be used on any consumer-facing products that contain non RDS certified material, regardless of their certification status.
   - No restrictions on other materials in the product

6. Focused on holistic animal welfare.
   - The RDS has a zero-tolerance policy for force-feeding or live-plucking on certified farms.
   - In addition, the RDS contains criteria that respect the Five Freedoms of animal welfare:
     - i. Freedom from hunger or thirst
     - ii. Freedom from discomfort
     - iii. Freedom from pain, injury or disease
     - iv. Freedom to express (most) normal behavior
     - v. Freedom from fear and distress
   - Social criteria on farms and production stages is **out of scope**.
   - Environmental criteria on farms and production stages is **out of scope**, *except as it relates to the health of the waterfowl.*

7. Robust chain of custody verification
   - Material from RDS-certified farms, slaughterhouses, and collectors will be tracked to the final product using the requirements of Content Claim Standard.

8. Parallel Production
   - Parallel production is **not allowed** on farms.
   - Parallel production is **allowed** on slaughterhouses.
   - Parallel production is **allowed** for down processers and suppliers.

Needs Justification

1. There are animals used for the production of feathers and down that are being force-fed, live-plucked, and/or are not being treated with respect to the Five Freedoms.

2. There is an industry need for a chain of custody tool that verifies whether purchased down and feather materials have come from farms or collectors that operate with respect to the Five Freedoms.

3. Down and feather are sourced from various regions in the world, with a range of practices and socio-economic levels. One common tool is needed to verify practices across this range.

Existing Standards

Responsible Down Standard
- Third-party
- Complete ban on live-plucking and force-feeding
- Strong chain of custody
- Widely used across outdoor, apparel, and home goods sector
- Does not require Parent Farm certification (unless down or feathers are sourced), but includes the option
- Transparent, stakeholder-led process

Global Traceable Down Standard
- Third-party
- Complete ban on live-plucking and force-feeding
- Strong chain of custody
- Regarded as very high animal welfare criteria, requires industrial supply chains to be certified to parent farm level
- Limited adoption
- Transparent, stakeholder-led process

Downpass 2017
- Third-party
- Complete ban on live-plucking and ban force-feeding (as of 2017)
- Used primarily in the home goods (bedding) sector
- Stakeholder engagement is part of the process, but led and managed privately

DIST (Montcler)

- Second-party

Fjallraven

- **Second-party**

Down CODEX (Mountain Equipment, UK)

- **Second-party**

IDFL Down Standard

- **Third-party**

Risk Assessment/*Risk Plan*

Credibility of the Standard

1. Corruption in the certification process
   - *Sufficient checks and balances in the certification process (e.g. auditors should not regularly inspect the same facility over time, limiting the possibility of establishing a relationship).*
   - *Use of local auditors to understand the underlying issues and behaviors, and to look out for areas of potential problem.*
   - *Proper oversight into the CBs certification process (Accreditation)*

2. Deliberate misleading of auditors by sites being certified.
   - *Training and education of sites being certified, so that they understand the goals of the standard and buy into the process.*
   - *Option to withdraw certification for a minimum period of time; with publication of this withdrawal on standard website.*

3. Farms revert to "bad practices" when the auditor is not there
   - *Unannounced audits*
     - *Very difficult in the first year.*
     - *Scheduling, finding the farms, having the farmer present may be difficult*
     - *Difficult to see documentation and audit for traceability*
     - *Disease control*
     - *Slaughterhouses can set up a system to check the identification of the auditors, so they will know to allow them in. Establishing who is allowed to go in.*
     - *A person from the slaughterhouse present to go with the auditor to the farms is helpful.*
   - *Two-week window system may be necessary in order for the farms to be present.*

4. Consistent and thorough application of requirements across all Certification Bodies
   - *Strong guidance documents for certification bodies.*
   - *Development of modules for auditor training, required for all auditors to the standard.*

- *Shadow audits, for oversight of audits of facilities.*
- *ISEAL Codes of Practice*

5. Parallel production at the slaughterhouse and in processing units may contribute to the loss of credibility in the standard.
6. Parent farms as an optional module, this may be a risk to the credibility of the standard.

Failure to Meet the Goals

7. Increased cost to the system without increased assurance
   - *Feedback from broad range of stakeholders to fully understand the implications of standard decisions.*
   - *Using a risk-based approach to target applicable criteria to the areas of risk*
   - *Increase adoption of the standard to give certified sites multiple customers and allow them to maximize the volume of certified down or feathers, thus driving down the per-unit cost of certification.*
   - *Outreach into the meat industry to support demand for ethically raised duck and geese from supermarkets, etc.*

8. Lack of understanding of the standard by the users

   - *Direct **training**: written support materials, webinars, presentations.*

     o *Training and education of supply chain and brands on why it's important.*
   - *Partnering with on-the-ground organizations to **educate** farmers, producer groups, and down suppliers on the issues to be addressed by the standard, and how to comply with the standard.*

Limitation of Impact

9. Limited application due to restrictive requirements
   - *Strong stakeholder representation in the development and review of the standard.*
   - *Proper research and piloting of the standard in a variety of geographic regions.*
   - *Flexible structure to the standard, particularly through the 50% compliance of the minor requirements.*
   - *Ensure that the chain of custody criteria is strong and flexible enough to address the varying types of business models from the farm to the down supplier.*

10. Creating additional obstacles to disadvantaged stakeholders
    - *Identify groups that may act as a liaison between farmers, producer groups, small down suppliers and the Stakeholder Process.*

- *Incentivize trainings as a way to encourage participation (e.g. reduction in number of audits, etc.*
- *Ensure that the barriers to participation in the review are minimal (e.g. online documents, email, phone calls, in-person meetings are all provided)*

11. Requirements of the RDS conflict with legislation or with other standards (e.g. worker welfare)
    - *Set up procedures to address any conflicts (already developed in the current RDS).*
12. What's in it for the farmer?
    - *Work with the down suppliers to identify and implement those incentives.*
    - *How do we incentivize the processors to incentivize their farmers?*
    - *Link changes and improvements to better outcomes (data collection and impact reporting)*
    - *Value in recognition for the work that they are doing*
    - *Global community of practice, library of best practices*