

## RDS Revision IWG Call| Thursday, October 2, 2014

### Agenda:

1. Introductions
2. Housekeeping:
  - Chatham House Rules – comments from the call should not be attributed to the speaker
  - Charter – please sign and return to Ashley if you have not done this yet
  - Names – please give your permission to be listed online if you have not yet done so
  - Portland meetings – Animal Welfare session as part of the conference in Portland (November 10-12), RDS IWG Meeting (Wednesday, November 12 at 3 PM), Down stakeholder meeting (Thursday, November 13; organized by EOG, OIA, and BSI)
3. Terms of Reference - discussion on key changes to Scope
4. Additional Issues:
  - Parallel production
  - Unannounced audits
5. Additional notes on Risk Plan

## Scope

### 1. From "hatchling through to final product"

- Global supply chain from hatchling through to final product assembly: hatcheries\*, farms, collectors, slaughter, processing, finished goods manufacturing, traders, transport
- Parent farms will be audited when they are a source of down or feathers

*\* hatcheries only apply for ducklings or goslings over 3 days of age*

### For discussion

- Do we want to?
  - a. Keep the original scope from gosling to final product
  - b. Expand the scope to include parent farms
  - c. Include parent farm as an option module, that will not impact RDS certification (ie: only one logo – no tiered standard)

### Key Challenges

- Wide variety of supply chain models and chain of custody practices
- Establishing the traceability from farm to hatchery to egg to parent farm to find the right parent farms to audit
  - There is a great variety in the supply chain models from farm to parent farm
  - There can often be exchange of eggs between parent farms, and between hatcheries
  - Farmers often do not know where the eggs are from, do not have access to the parent farms of the hatcheries from which they source
  - Farmers and hatcheries may buy from multiple parent farms, and their sources change frequently.
- Increased cost of certification (as a result of additional audits)
- Added requirements on farmers to manage the sources of their eggs or goslings may increase resistance to adoption of the standard
- Very indirect and small influence on the parent farms through the purchase of down and feathers
- Access to the parent farms would be quite difficult. There would need to be a way to bring them into the system.
- Increased time to certify a supply chain: the parent farms would need to be certified prior to the breeding cycle; otherwise failed audits could affect goods that had previously been certified

Note that the Technical Committee is conducting further research to better understand the supply chain models and the issues that need to be addressed, and identify possible solutions.

#### Discussion:

- Parent farms have been raised as a key issue, because parent animals are kept up to 4-5 years. There is a high-risk of live-plucking on these farms. If we exclude the parent farms, that would exclude a major part of the suffering.
- “From a down processor perspective, access to the parent farms is quite difficult. With the hatcheries, many are government controlled. Literally tracing back to a parent farm, can become a practical impossibility. There are some with more linear direct relationships, but this is not the norm. If parent farms were part of the RDS requirements, it would put a serious limitation on the amount of down that could be certified. Up to 80-90% of all the down sourced would not be able to meet the requirement. It’s not a practical requirement to apply to the entire industry.”
- “There are some great obstacles to be able to include the parent farms in the standard. But at the same time, we need to keep RDS a strong system. We need to find a way to bring them into the circle. This may take time, but it will add to the integrity of what RDS is trying to achieve: care for the animals. While there are challenges, we should continue to gather data, and see what we can do. Find out what we can do. There is an opportunity for the RDS to become a very viable commercial product, and if we don’t look into this issue, we will lose credibility.”
- Anne - The idea is that once the standard is settled, we go through a regular revision ever 2-3 years. We need to bring a lot of people in, and then to work towards shifting the system one step forward.
- “We strongly believe in going all the way to the parent farms because that is the core of what we are trying to do, to achieve animal welfare. If it’s an optional module, then how do we motivate brands to move forward and working to address the issue? We need to make this standard one that recognizes the work people are doing. This should be the rule and not the exception.
  - o How do you recognize brands that have “gone the extra mile”?
  - o How do you push brands to “go the extra mile” if it is not a requirement?”
- For some brands that have addressed parent farms, maybe there is some insight into how to apply those requirements to supply chains where the traceability is not possible.
- “There are some companies that we currently can’t force to trace to parent farms, and because we can’t find traceability into the parent farms, as a brand we made the decision to source less down in order. That was the only way to fully source from supply chains that meet the parent farm requirements.”
- This strategy works for small brands, but many may not be able to meet those requirements.
- The TDS has adopted a tiered system to recognize the brands that have gone the extra mile, but still bring in those that are not able to do that.
- Anne - From an auditing perspective, the RDS allows for strong chain of custody between the supply chain members. If we started the RDS with the parent farm requirement, we would have had a part of the supply chain with very weak chain of custody, and this was not acceptable.
- Recognition: There is a strong consensus that the RDS will not be a tiered system. We can give brands the language and support to communicate their decision to track back to the parent farms, if they wish to go further, but the logo use will stay the same.
- “There should be a “North Star” for everyone to strive towards. There are difficult items to address because of where the industry is at the moment, our work should be to move the industry in that direction.”
- Parent farms are one of the “north stars”, but there are others that are crucial to the rest of the standard. We cannot work to address parent farms if we are compromising the chain of custody, or other elements of the standard.
- There needs to be much more research into this area.
- If it’s possible, then maybe those suppliers could be categorized as a “preferred supplier”.
- There are mechanisms within the standard itself to collect information.

Outcome: We will bring this discussion back to the Steering Committee to follow our consensus-based decision-making procedures.

## 2. Applicable for industrialized and small farm - collector based channels

- “Collector-based” – in China, there are also “collectors” collecting from industrialized farms, this is confusing in the standard. “Small-farm based” would be a bit more helpful.
- There are many types of collector- based channels. We will add language to include small-farms, household, etc.

## 3. Applies to both blended and 100% certified products

While the RDS will still be applicable for blended products (to support companies to meet corporate goals of RDS use), final products can only be identified if the down and/or feather content is 100% certified to the RDS.

Because the word “down” is in the actual logo, there isn’t a need to limit the blend with other materials, even non-certified animal material.

## 4. Holistic animal welfare

- beyond prohibition of force-feeding and live plucking

- Freedom from hunger or thirst
- Freedom from discomfort
- Freedom from pain, injury or disease
- Freedom to express (most) normal behavior
- Freedom from fear and distress

- The animal will ultimately be slaughtered; they won’t ever be actually free from fear or distress.
- We are clear that the standard doesn’t offer any guarantee, but the goal is to respect the five freedoms. Maybe we can change the language to “respect” the five freedoms, instead of to “guarantee” the five freedoms.

## Additional Issues

### Parallel Production

The current version of the RDS allows for parallel production only when there are ‘geese and ducks that are easily visually distinguished’. This will be changed to prohibit any parallel production on RDS-certified farms.

Parallel production will still be allowed at the other stages of the supply chain.

### Discussion

The CCS gives it the strength to maintain the integrity of the RDS inputs separately from non-certified inputs.

To be clear, when we talk about no parallel production at the farm level, this means that the farms cannot – at any time – have non-RDS certified ducks or geese.

### Unannounced Visits

For discussion:

- a. Should unannounced visits be given with no advance notification at all? Does this apply equally for farms and processors? Shall we set a maximum time, or leave it to the discretion of the certification body?
- b. Should 100% of farm visits be unannounced? Or can we stick to 100% announced visits, and a percentage of unannounced? Should these unannounced visits be on a random or a risk basis, or a combination of both?

Note that 100% of the small-farm, collector-based audits of the RDS are currently unannounced.

### Key Challenges

- Need advance notice for control of disease
- Finding the farms can be difficult, auditors may need to call and ask for direction
- From the animal rights perspective:

### Discussion

- In the current standard, we consider unannounced audits to be no more than 48 hours.
- A goal to strive for: 100% of all facilities unannounced audits at the farm level.
- A lack of unannounced audits would compromise the integrity of the standard, but this could be a goal of the standard over time.
- "Has anyone considered semi-announced visits? An audit is booked, and the farm is given a window of time where the audit would happen. For example, sometime during the month of August.
  - o In this case, they could just stop live-plucking for that month
  - o The contamination and hygiene issues would still apply
  - o If the unannounced visit happens when the farmer is not there, then some things could still be observed.
  - o The GPS coordinates could be listed, require barrier protective clothing for all visits, and also require that the animals age be listed so that the auditors could check at the time when live-plucking would be most be common."
- The concern with these types of visits is that they may in fact give the farmer more warning about when the audit timeframe will be, so that they can react in advance.
- From a practicality standpoint, the current system is in a pretty good place, a balance of including some unannounced visits, and not requiring full 100% unannounced for all farms. This is something that could easily change over time to require more unannounced audits overtime.
- We will do some more work on these terms of reference.
- Do some offline work to make sure that the incorporation of unannounced visits.
- Risk assessment could be used in how an audit is announced. Maybe for higher risk regions, there are more unannounced.
- What other standards are using truly unannounced visits? Maybe we can learn from them.

### Outcome

TE will look at other models for unannounced visits, and discuss effective strategies in more detail with Four Paws

## 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. Brands are feeling pressure from Animal Welfare and Animal Rights groups to address these issues.
3. There have not been any public global third party standards, applicable for the full textile industry and down industry, that fully address animal welfare issues and chain of custody.
4. At this point in time there is the opportunity to align the needs of the many stakeholders, and develop an efficient and effective tool that will send a clear message to the industry.

## **Risk Assessment/Risk Plan**

1. Traceability, particularly through small farm collectors.
  - *This will be a key focus for the revision work. The current RDS sets strong traceability requirements, but we will want to look at ways to help the collectors put the traceability in*

*place, and to develop further tools for certification bodies to effectively evaluate the effectiveness of the traceability.*

*- there was also a comment: " transportation systems of the animals from the farm to the slaughter house" This is covered in the current standard. Is there more detail needed?*

2. Incorrect or inconsistent certification results.
  - *Strong guidance for certification bodies; training, tools*
  - *Assisted auditing, someone from the standard-setting organization to guide the new auditors in what to look for and what to do; shadow audits, accreditation audits, pull examples of Control Union*
3. Deliberate misleading of auditors by sites being certified.
  - *Training of sites being certified, so that they understand the goals of the RDS and buy into the process*
  - *Withdrawal of certification for a minimum period of time; TE will publish this withdrawal on their website.*
4. Lack of understanding of standard's requirements by sites being certified.
  - *Direct training by Textile Exchange or the certification body, written support materials, webinars, presentations*
5. Introducing increased costs and complication to the supply chain.
  - *Involvement of stakeholders in the development process so that the standard is practical in its application*
  - *Use of CCS to overlap with certification to other TE standards (OCS, RCS, GRS, RDS)*
  - *Encourage widespread use of the RDS 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 to become almost minimal.*
    - o *Costs will also be lowered if the meat industry were to be involved.*
    - o *There is interest in this from some supermarket industry.*
    - o *Influence into the food industry, at the farm level up to the parent farm.*
  - *Encourage widespread use of the RDS to set consistent expectations and practices in the industry that will create an even playing field for all involved.*
6. Requirements of the RDS conflict with legislation or with other standards (eg: worker welfare)
  - *Research local legislations and standards being used for waterfowl*
  - *Set up procedures to address any conflicts (already developed in the current RDS)*
  - *Setting up sanctions in place to ensure compliance with local legislation*
  - *(Note that this is already covered in the standard.)*
7. Corruption
  - *Sufficient checks and balances in the certification process*
  - *Adequate accreditation procedures, with anti-corruption policies in place*
  - *Use of local auditors to understand the underlying issues and behaviours, and to look out for areas of potential problem*
  - *Making sure that an auditor does not regularly visit the same site*
  - *Setting up sanctions that CB follow the rules, oversight of CBs*
  - *(these are covered by third party accreditation)*
8. Impacts on existing initiatives
  - *Early discussion with existing initiatives, and involvement in the development of the RDS*
  - *Collaborate to combine, adopt or recognize requirements of existing standards.*
9. Wide diversity of farming practices around the globe

- *Strong stakeholder representation in the development and review of the standard*
- *Flexible structure to the standard, particularly through the 50% compliance of the minor requirements*
- *Research of the local farming practices*

***Next Steps:*** *The Steering Committee will review the TOR with the goal to achieve consensus.*