

## Responsible Down Standard Full IWG Call | January 15, 2015

The suggested text for companies who have opted to use the optional Parent Farm module in off-product communication. It could also be used for product communication if a brand wanted to do that as well.

- Product labeling of parent farm certification would be additional recognition of companies that had opted for
- Having a requirement about approval for parent farm communication on a product could create an additional barrier for companies.
- Will it be possible to use this claim if there is some parent farm certified down mixed with RDS certified down?
  - o Product claims that mention Parent Farm Certification should contain 100% Parent Farm Certified Down.
  - o It is also possible for companies to talk about their parent farm certification for sections of their supply chain, as long as the information is accurate and verified.
- If Parent Farms fails an audit, have measures in place to make sure that all the down from that parent farm is taken out of certification.

Add F6.13 – cages must be sufficiently spacious.

Including the requirement of getting paperwork from the veterinarians was a difficult piece of information to get, and often they did not really understand what they were signing.

Unannounced Visits:

For subsequent visits:

- a. 1/3 announced full audits
- b. 1/3 minimum announced full audits with less than 4 weeks notice?
- c. at least 1/3 semi-announced (maximum 72 hours notice) or unannounced full audits (2 months<sup>1</sup> window)

**Comment [AG1]:** We can also encourage CB's to plan these with as little advance notice as possible.

**Comment [AG2]:** Split this into

From Nina:

The only case where announced audits will work is if farms have already plucked, and that may only be after the first 10 weeks of life.

The preference from our team is to increase the number of semi-announced or unannounced and to drop the announced audits with more than 4 weeks notice.

Our proposal is move to:

1/3 announced with 4 weeks notice

2/3 semi-announced and unannounced with 2 months window

Additional 1/3 surprise visits

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<sup>1</sup> all parent farms will have a 2 months window for unannounced audits

With the above suggestion, the priority for traceability becomes a stronger concern than the animal welfare.

Control Union: 1/3 additional surprise visits is quite significant. Right now 90% of the farms being certified do not have parent farms, but the animals are there for too short a period of time. I would think this should be focused on the parent farms. I think the surprise visits are mostly for live-plucking, and if there are other risks, then we could conduct a risk analysis of those factors.

If we did 1/3 of the parent farm audits, then that would be addressing a higher point of risk. Ducks that are slaughtered at the 8 week mark, and geese that are slaughtered at 12 weeks are less likely to be plucked. So it would make sense to apply the 1/3 surprise visits to parent farms or other high-risk farms (farms that slaughter at an older age). So then we could drop the 1/3 to a lower percentage for other farms. But 5% could still be low, if slaughtering at an older age is more common.

Gyorgyi can collect more data in this area.

Changing requirements can have a big impact on the overall cost of certification. We could be pushing it a bit far in terms

High-risk farms would include all parent farms.

If we could specify which type of visits, if we have an unsuccessful visit, then it would be somehow invoiced to the supply chain. It is an issue in China where we have to fly over. In China, we arrange the whole supply chain visit over a two week period. It's a little difficult to add in surprise visits, or the semi-announced.

All parent farms would be determined as high-risk.

In terms of cost, the discussion was that the surprise visits would not be full inspections, but more fence visits. Perhaps that might help with the cost. In European countries, then that would be easier, you could spend 30 minutes. But in China, you could spend a half day or more for a "fence visit" due to travel.

The cost is not only the time that the auditor is there, but there is additional paperwork, etc. Assessing the cost is more about the number of site visits, instead of the length of the visit.

This is something that we will not be able to defend in the public, when we get questions about the number of visits. If there won't be

It could be an option to introduce a more severe consequence to finding live-plucking on a farm or slaughterhouse.

Make it a requirement that the slaughterhouse does a number of surprise visits to their suppliers, then that could be something that the CB audits against.

1/3 surprise visits to high-risk farms (the risk assessment done on the initial evaluation would determine the risk of the farm). All parent farms would automatically be considered high-risk, and other high-risk farms would be where they are slaughtering at a higher age.

If a brand did not adopt the parent farm module, then 1/3 of their high-risk farms would have surprise visits. This would increase the cost of certification by 1/3 for high-risk farms.

Surprise visits could be the only visit, as long as they were able to do the full audit.

All first visits would be announced.

Is it possible to work through suppliers to make sure that auditors always have permission to enter? This is possible in some cases, but in small farms it's very difficult.

Could this visit include visiting the office? This is possible. But in some cases, we could still not have the right person. Theoretically it's possible, but there are always instances where it's difficult to work out.

If an auditor is going to a certain region, they will also do surprise visits on that same trip, and probably on other visits in that same supply chain. If a visit is happening at an office where they are sharing offices, then you could do another surprise visit on a different farm.

High-risk farms

Could we do 1/3 surprise visits and 2/3 announced? The suggestion was for 1/3 in addition to the other visits.

If a surprise visit is done and it is a complete audit, then that would take the place of the full audit.

The purpose of the audits: The goal is to catch any instances of live-plucking so that we can eliminate them from the supply chain, and discourage any further live-plucking. We also want to keep the cost as low as possible.

While it might seem tedious to decide the percentages of these types of audits, it is important to define them. Later when multiple Certification Bodies are certifying to the standard, there will be a tendency to choose the lowest minimum requirement and then they would ultimately be cheaper and companies would go with them. We need to be as prescriptive on this point as possible.

Who determines the risk? The Certification Body. Risk factors would be included as a part of the standard, but then the Certification Body would ultimately determine the risk.

Add age of slaughter to the list of risk factors.

There would need to be a way to make sure that a CB isn't labeling some companies as low or high risk.

Send any other comments to us to us and we will continue to find something to work it out.

**Assigning risk:**

For the Parent Farm Certification claim, if that could be as specific as possible. If a brand decides to claim that, then the language should reflect that. It shouldn't be a blanket statement that claims to cover their whole supply chain.

Could make that more specific, be more prescriptive to avoid confusion. Translating becomes difficult. Suggested wording makes translations easier. For on-product, wording needs to be consistent. But for off-product, then brands probably would want more flexibility.