The Responsible Down Standard was originally released January 2014.
Sites shall have until March 30, 2016 to comply with RDS 2.0.
For more details on the RDS 2.0 transition policy, visit http://responsibledown.org/.

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Down Standard as the source of any selected passage, extract, diagram or other information.
Definitions

These definitions are in addition to and supersede the definitions in the Content Claim Standard.

**Announced audit**
The site is contacted in advance to set a date for the on-site audit.

**Assembler**
Facility where the down is used in the production of consumer products (eg: jackets, sleeping bags, bedding).

**Audit**
A means to verify compliance with a standard. Audits can be on-site audits, desk audits (review of documents) or a combination of both.

**Certification Body (CB)**
An authorized third party carrying out audit and certification in accordance with the provisions set out in this Standard.

**Certified products**
Under this standard certified products can be a. 100% certified waterfowl; b. 100% certified waterfowl down and feather and c. blended waterfowl down and feather, containing from 5 – 99% percentage of certified material. Final products containing non-certified down are not permitted to be labelled with the RDS name or logo.

**Chain of Custody**
A system to document and control the path taken by a defined entry material through all stages of transfer and production, to the final product. The chain of custody preserves the identity of the entry material.

**Collector**
A person or company that collects down and feather from farmers and trades this to other collectors, down traders and/or (pre-)processor. A collector can work independently or under contract by other collectors / (pre-)processors. There may be multiple levels of collectors. In the standard, the registered collector is the small collector collecting from households and registered by the large collector as an approved RDS collector.

**Confirmation visit**
Less than one hour notification; visual check for animal welfare compliance only. Confirmation visits are to be done in addition to full audits.

**Content Claim Standard (TE CCS)**
The Textile Exchange Content Claim Standard is a chain of custody standard for tracking and verifying the content of one or more specific raw materials in a final product. The CCS is owned and managed by Textile Exchange, a non-profit organization committed to the responsible expansion of textile sustainability across the global textile value chain.

**Down**
The fine plumage on a waterfowl that sits under the outer feathers. For simplicity, the term “down” refers to all plumage including feathers and down in this standard. All requirements in the standard are applied to...
down and feathers.

**Farm**
Any site where waterfowl are raised for food production or for the production of parent waterfowl. Also referred to as parent farm, raising farm, grow-out farm, fattening farm or stations.

**Force-feeding**
Any form of feeding that forces the waterfowl to eat more than it wants/needs. In particular, this refers to manual intervention using mechanical equipment (tubes) to increase the fat content, often for the production of foie gras.

**Hatchery**
Facility where waterfowl eggs are mechanically or naturally hatched to produce waterfowl.

**Industrial Farms**
Facility where waterfowl are owned by a company and raised for sale to the meat industry.

**Live plucking**
Any form of removing down and feather from living waterfowl. For the purpose of this standard, live plucking also includes any form of molt harvesting.

**Parallel production**
Carrying certified and non-certified waterfowl or down and feathers at the same location.

**Parent farm**
Any farm where waterfowl are kept for producing eggs. Any time RDS down is collected from a parent farm, the entire farm is subject to RDS certification.

**(Pre-)Processor**
Facility where down and feather are (pre-) processed. This may include one or more of the following activities: drying, separation, washing, sorting, blending, lab analysis, and (re-)packaging.

**Scope Certificate**
A document issued by the Certification Body that verifies that a given organization is qualified to produce goods to the standard.

**Semi-announced audits**
On-site audits with up to 72 hour notice, to be sure that the facility is open and the correct people are available for the on-site audit.

**Shall**
Throughout the standard the term ‘shall’ means that the requirement is obligatory.

**Should**
Throughout the standard the term ‘should’ means that the requirement is recommended.

**Site**
A single farm, functional unit of an organization, or a combination of units situated at one locality, which is geographically distinct from other units of the same organization.
Slaughter Site
Any place where the waterfowl are killed and the down and feather is removed from the body. The slaughter process can either be executed manually or mechanically at farms, small facilities or large-scale slaughterhouse.

Small Farms
Farms where the waterfowl are owned by individuals or households, rather than by companies. The animals are raised for personal or local consumption, rather than for commercial slaughter or export.

Unannounced audits
The auditor gives a maximum of 2 months window within which the on-site audit will happen, and they arrive without any additional announcement. At the beginning of the certification year the CB will advise the farmer of the window of time during which an on-site audit will happen, and that they are responsible to be present and have the required documents on hand during that time.

Trader
Entity trading (buying and selling) RDS goods in the supply chain between the source of the down and the retail merchant of the final product, regardless of whether the goods are physically received or not (e.g. import, export or wholesale trading entities, or brand distribution centers selling to other retailers). Agents that do not take ownership of the goods and retailers only selling to the end consumer are not considered as traders.

Transaction Certificate (TC)
A document supplied by the Certification Body that verifies that the goods being shipped from one organization to the next conform to the ‘Responsible Down Standard’.

Warehouse
Location/facility where down and feather are collected and stored.

Waterfowl
Throughout this standard the term waterfowl shall mean domestically raised ducks and geese.
Introduction

The down and feather used for insulation in consumer products is sourced from worldwide production and processing supply chains. As a result, retailers and consumers are not informed sufficiently on the origin of the products and the conditions in which they were produced. This has raised concerns about the animal welfare conditions of waterfowl, and the lack of traceability of down and feather products. To ensure that final product claims are accurate, chain of custody controls are needed from the source of the down through to the final product.

The RDS ensures that independent, third party assessment of all aspects of animal rearing and handling, as well as chain of custody through the entire supply chain, will help to improve the welfare of animals and, at the same time, provide retailers and consumers alike with greater confidence in responsible sourcing.

The first version of the RDS was sponsored by The North Face, and developed through a joint effort between Control Union, Textile Exchange and The North Face. It involved considerable research into regional practices, supply chain models, and existing animal welfare standards with the input of a broad range of stakeholders. The North Face gifted ownership of the standard to Textile Exchange (TE) upon its completion.

This current version of the RDS has been developed by an International Working Group. The members of this group have given generously of their time and expertise, helping to improve the RDS and make it the best possible tool to shift the down and feather industry towards more humane practices.

The RDS provides a resource to the entire industry with the goal of improving the welfare of animals and the chain of custody for down on a global level.

The RDS will undergo a revision process at least every three years. Minor adjustments or interpretations to the standard between revisions may be added to the Implementation Manual and communicated through the relevant Certification Body.
RDS International Working Group

Technical Group:
Györgyi Ács Feketéné, Control Union
Adam Mott, The North Face
Anne Gillespie, Textile Exchange
Ashley Gill, Textile Exchange

Steering Committee:
Abi Rushton, Ethical Expert Ltd.
Alexander Baer, Pro Down Alliance
Beth Jensen, Outdoor Industry Association (OIA)
Margot Bennett, Coyuchi
Pamela Ravasio, European Outdoor Group (EOG)
Peter Roebuck, Trendsetter Home Furnishings
Steve Richardson, adidas

Advisory Group:
Daniel Uretsky, Allied Feather & Down
Oistein Thorsen, Benchmark Sustainability Science
Charline Ducas, C&A
Chad Altbairer, Downlite
Christine Hecktor, Down Décor
Dr. Juliane Hedderich, Ines Chucholowius, European Down & Feather Association (EDFA)
Matt Lieber, Josh Jarman, International Down & Feather Testing Laboratory (IDFL)
Joel Mertens, Valerie Presolly, Mountain Equipment Co-op (MEC)
Tab Morin, Multi Glory Home Textiles
Cathy Resler, PVH
Travis Stier, Pacific Coast Feather
Wendy Savage, Nicholas Allen, Patagonia
Rainer Zah, Quantis International
Hilke Patzwall, Markus Ernst, VAUDE Sport
Purpose

The goal of the Responsible Down Standard is to ensure that the waterfowl in the down supply chain are treated humanely. This is accomplished by providing the industry with the best possible tool to ensure that down and feathers do not come from animals that have been subjected to any unnecessary harm and to institute a chain of custody system to validate the source of the material.

Scope

The scope of the RDS shall include the entire supply chain of waterfowl down, from hatchling, slaughter, assembly of the final products, and to final trading with retailers, without geographical limitation. The RDS is applicable for industrialized and small farm - collector based channels. The standard includes an optional module for the certification of parent farms. The standard may apply to both blended and 100% certified products; however, final products may only be labeled as RDS certified if the down or feathers in them are 100% certified.

Certification

Application: Independent third party audits and certification to the RDS shall be applied to the whole supply chain, including down processors, final product manufacturers, and all traders (see Definitions). Retailers are not required to be certified.

Timing: Certification shall be renewed on an annual basis.

Certificates issued will be valid for a maximum period of 14 months. Before expiration of the certificate, a follow up audit shall be carried out to confirm continuous compliance.

Access: The auditors of the Certification Body shall have access to all sites, as well as the relevant documentation and records under the scope of certification. All companies under certification shall allow CBs to visit their facilities for the purpose of conducting audits or confirmation visits, per the requirements of the standard. The Certification Body has the right to carry out announced, unannounced, semi-announced and confirmation audits at all sites, following the procedures listed in Appendix A.

Sites: Certified sites may be farms, hatcheries, slaughter facilities, down collectors, (pre-) processors, warehouses, traders and assemblers. It is also possible for a site to have two or more of the above activities in its scope.

A farm may apply as an individual farmer, part of a small farmer group (SFG), or as a Contract Farm Group. To apply as a SFG, the conditions as set out under Module 4 shall be met. To apply as a Contract Farm Group, the conditions in Appendix C must be met.

Resolutions: Where local legislation and the RDS requirements conflict, the Certification Body shall contact TE to find the most practical resolution. When there is confusion about the interpretation of the standard, the first point of contact shall be the Certification Body, which will contact Textile Exchange if further clarification is needed.
Modules: The standard consists of four modules:

1. Farm module
2. Slaughter module
3. Transport module
4. Small Farmer Group module (SFG)
5. TE Content Claim Standard
6. Parent Farm Certification (optional)

Module 5 consists of the requirements written in the Content Claim Standard (CCS) standard of Textile Exchange (http://contentclaim.org/). The Content Claim Standard is a chain of custody standard for tracking and verifying the content of one or more specific raw materials in a final product. Module 5 only applies for the 'down and feather' based portions in the supply chain, in which the use of Transaction Certificates (TC's) is obligatory. For the 'waterfowl' based components TC's are not obligatory as specific Chain of Custody requirements are embedded in modules 1 and 4. Guidance for the use of Content Claim Standard as a component of the Responsible Down Standard may be found in the RDS Implementation Manual.

Farm, slaughter, and transport modules shall apply to live animals and consist of animal welfare requirements in addition to the chain of custody requirements.

Modules shall be applied to the sites based on the activities being performed. The modules that may be included in the scope of the audit and certification for each type of facility are specified below.

Farms shall comply with the requirements of the following modules as they apply to the operations:

- Farm module
- Small Farmer Group module
- Transport module
- Slaughter module
- Textile Exchange Content Claim Standard

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.

Hatcheries shall comply with the requirements of the following modules as they apply to the operations:

- Farm module
- Transport module

Slaughter Sites shall comply with the requirements of the following modules as they apply to the operations:

- Slaughter module
- Transport module
- Textile Exchange Content Claim Standard
Collectors, (Pre-)Processors, Traders, Warehouses and Assemblers shall comply with the following module as they apply to the operations:

- Textile Exchange Content Claim Standard

During the application process by a site to request certification, it will be determined which of the above module(s) shall be included in the scope of the audit.

**Requirement Types**

There are four types of requirements in the standard: ‘CRITICAL MAJOR’, MAJOR’, ‘MINOR’ and ‘RECOMMENDATION’.

CRITICAL MAJOR requirements are the most important and they shall all be met during the audit to achieve and/or maintain certification. If non-compliance to any of the CRITICAL MAJOR requirements is found, the certificate of the site shall be immediately suspended and the supply chain will be informed. No down or waterfowl will qualify as certified until the corrections are made and verified. In the case of an initial audit, the site’s request for certification shall be denied. If a site does not correct its CRITICAL MAJOR non-compliances within 6 months, they shall have to re-apply for certification.

MAJOR requirements shall be met to achieve certification. If non-compliance to any MAJOR requirements is found, the site has 60 days to prove compliance to the satisfaction of the Certification Body. During this time, the down and/or waterfowl may still be sold under certification (except in the case of an initial audit). If the site fails to correct MAJOR non-compliances within 60 days after the audit, the certificate shall be suspended and the supply chain informed. In the case of an initial audit, the site shall not receive any certification until all MAJOR non-compliances are closed.

MINOR requirements are important; therefore all minor requirements shall be fully audited by the Certification Body. 50% of MINOR requirements per module shall be met for certification. If less than 50% of the MINOR requirements are met, the site will have up to 60 days to demonstrate compliance to a minimum level of 50% of the MINOR requirements. At the discretion of the Certification Body, a plan of action may be accepted to demonstrate compliance. In future versions of the standard, the compliance rate for MINOR requirements may be increased.

For all levels of requirements, initial certifications are not given until the required number of non-compliances identified by the Certification Body have been corrected and verified.

RECOMMENDATIONS are not required to be met in order to receive certification. They serve as guidance and are recommended based on best practices in the industry, and may be integrated as requirements in future versions of the standard. All RECOMMENDATIONS shall be fully audited and recorded by the Certification Body, but do not have any effect on the certification status of the site.

The RDS is rigorous and also designed to allow for continuous improvement as the industry evolves. Reviews and revisions will be done on a regular basis (every 3-5 years once the standard is established), with the purpose of incorporating new insights gained from the certification and from stakeholders. The process will be used to adjust requirements and determine whether the percentage and/or level of requirements needed to achieve compliance should be changed or not. The goal will be to continually increase the rigor of the standard at the rate that the industry can change.
In the RDS, the following verbal forms are used to indicate requirements, recommendations, permissions, and possibilities or capabilities:

- “shall” indicates a requirement;
- “should” indicates a recommendation;
- “may” indicates a permission;
- “can” indicates a possibility or a capability.

References

The following documents are part of the Responsible Down Standard and are fully binding. All can be found at http://responsibledown.org.

- Textile Exchange Content Claim Standard (TE CCS)
- Textile Exchange Content Claim Standard Implementation Manual
- RDS Logo Use and Claims Guide
- RDS Implementation Manual
- TE Scope Certificate Policy
- TE Transaction Certificate Policy
1. Farm Module

This module shall apply to farms.

Audit procedures for the Farm module can be found in Appendix A.

<table>
<thead>
<tr>
<th>PRINCIPLE 1: PROHIBITION OF FORCE-FEEDING</th>
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<tr>
<td>F1.1</td>
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<tr>
<th>PRINCIPLE 2: PROHIBITION OF LIVE-PLUCKING</th>
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<td>F2.1</td>
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### PRINCIPLE 3: COMPLIANCE TO LOCAL LEGISLATION

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<th>Nr.</th>
<th>REQUIREMENT</th>
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<th>LEVEL</th>
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<tbody>
<tr>
<td>F3.1</td>
<td>The farm shall comply with local legislation on animal welfare.</td>
<td>atra</td>
<td>MAJOR</td>
</tr>
</tbody>
</table>

### PRINCIPLE 4: PROHIBITION OF PARALLEL PRODUCTION

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<th>Nr.</th>
<th>REQUIREMENT</th>
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<tbody>
<tr>
<td>F4.1</td>
<td>Parallel production is not allowed.</td>
<td></td>
<td>CRITICAL MAJOR</td>
</tr>
</tbody>
</table>

### PRINCIPLE 5: FEED AND WATER

<table>
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<tr>
<th>Nr.</th>
<th>REQUIREMENT</th>
<th>GUIDANCE</th>
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</table>
| F5.1| Waterfowl shall be provided with a supply of clean, fresh and safe drinking water. | Water shall be provided in such a way that animals can drink without undue competition (drinking space allowance per waterfowl; sufficient number of drinking points and water flow rate).  
An automatic refill system is preferred. If watering is done manually, it should be done and checked on a regular basis (minimum 2 times a day).  
*Small Farmer Groups shall ensure that waterfowl have access to drinking water.* | MAJOR   |
| F5.2 | Waterfowl shall be provided with sufficient food to meet their nutritional needs and maintain them in good condition. | Feed shall be available during daylight hours, ad libitum feeding regime (feed is continuously available for the animal), feed to be provided at all times in such a way that animals can eat and drink without undue competition (sufficient feeder space allowance per waterfowl), equal spread of feeding facilities giving waterfowl enough space when eating and drinking. Food should be checked at least twice daily to ensure there is adequate food. Whenever possible, the use of feed from genetically modified sources should be avoided. Small Farmer Groups shall ensure that waterfowl have access to adequate quantities of food. | MAJOR |
| F5.3 | A written feeding plan shall be available ensuring that the nutritional requirements of the waterfowl are being met. | | RECOMMENDATION Not applicable for Small Farmer Groups |

### PRINCIPLE 6: HOUSING, STOCKING DENSITY, AND OUTDOOR ACCESS

<table>
<thead>
<tr>
<th>Nr.</th>
<th>REQUIREMENT</th>
<th>GUIDANCE</th>
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<tbody>
<tr>
<td>F6.1</td>
<td>Female waterfowl that are in lay must be provided with nesting areas that provide a partially enclosed area for egg-laying and each nest area must contain friable nesting material.</td>
<td>Space and comfort shall be provided to waterfowl. It is recommended to have at least one nest box for every four birds.</td>
<td>MAJOR</td>
</tr>
<tr>
<td>F6.2</td>
<td>Nesting areas must be weatherproof and dry.</td>
<td>Nesting areas for waterfowl must be dry relative to nesting habit of the breed. Nesting areas should be dark following the natural sleeping patterns of the animals.</td>
<td>MINOR</td>
</tr>
<tr>
<td>F6.3</td>
<td>Waterfowl shall have access to housing or a shelter protecting them from extreme weather conditions.</td>
<td>Extreme weather conditions may include winds, sleet, heavy snows and sun in climatic regions where the welfare of the birds might negatively impacted. The roof and walls shall be in good condition and be waterproof where needed. Walls may be added only for times of extreme weather.</td>
<td>MINOR</td>
</tr>
<tr>
<td>F6.4</td>
<td>Housing shall be located away from areas of (potential) run off.</td>
<td>Run off: water running to housing.</td>
<td>MINOR not applicable if F6.3 is no</td>
</tr>
<tr>
<td>F6.5</td>
<td>Shelters and housing (incl. nesting areas) shall be well ventilated and allow fresh air to enter.</td>
<td>The house or shelter must be managed to eliminate ammonia and mold.</td>
<td>MINOR not applicable if F6.3 is no</td>
</tr>
<tr>
<td>F6.6</td>
<td>Shelters and housing shall allow natural light to enter.</td>
<td></td>
<td>MINOR</td>
</tr>
<tr>
<td>F6.7</td>
<td>Except for brooding under a heat lamp up to four weeks of age, a minimum of eight hours of darkness at night and eight hours of light during the day shall be provided.</td>
<td>Small Farmer groups shall ensure that waterfowl have normal lighting patterns.</td>
<td>MINOR</td>
</tr>
<tr>
<td>F6.8</td>
<td>If artificial light is used, it should be distributed evenly.</td>
<td>Uniform pattern of lighting.</td>
<td>RECOMMENDATION</td>
</tr>
<tr>
<td>F6.9</td>
<td>Housing and shelters shall have solid floors and an area available that provides dry footing. Dry, mold-free bedding shall be continuously available to waterfowl.</td>
<td>Well-drained floors. Existing mesh or slatted flooring areas may be covered to create the equivalent of a solid surface. The facility shall follow a regular cleaning schedule.</td>
<td>MINOR</td>
</tr>
<tr>
<td>F6.10</td>
<td>Waterfowl shall have sufficient space to enable them without competition to 1. move freely 2. stand 3. turn around 4. stretch their wings 5. run</td>
<td>Waterfowl may be temporarily held in cages for vaccinations or other justified reasons.</td>
<td>MAJOR</td>
</tr>
<tr>
<td>F6.11</td>
<td>Waterfowl shall not be kept in cages that prohibit the animals from expressing normal behavior.</td>
<td>Waterfowl should have sufficient area to express natural behaviors such as stretching their wings or socializing with other birds.</td>
<td>MAJOR</td>
</tr>
<tr>
<td>F6.12</td>
<td>Waterfowl shall have free outside access from six weeks of age. Temporary confinement dependent on weather conditions is permissible if the health or welfare of the birds would be otherwise compromised.</td>
<td>Sufficient number of exits, waterfowl shall be able to see the exits.</td>
<td>MINOR</td>
</tr>
<tr>
<td>F6.13</td>
<td>Outdoor area shall have sufficient space that is consistently dry.</td>
<td>The waterfowl shall not be forced to stand in water or mud.</td>
<td>MINOR</td>
</tr>
<tr>
<td>F6.14</td>
<td>Waterfowl should have access to water for behavioral needs.</td>
<td>The water should be deep enough to be able to swim without the feet touching the bottom of the water. Farms should ensure that ducks and geese have at least weekly access to pools.</td>
<td>RECOMMENDATION</td>
</tr>
<tr>
<td>F6.15</td>
<td>Water for behavioral needs should be kept clean and free of contamination.</td>
<td></td>
<td>RECOMMENDATION</td>
</tr>
<tr>
<td>F6.16</td>
<td>A plan for emergency situations (e.g. fire, power or water cut off, flood, snow storm, feeding system breakdown, transport vehicle breakdown) shall be available to care for the waterfowl.</td>
<td>Examples: Emergency power supply source, fire plan with escape routes, fire extinguisher. A written plan is required for operations with more than five employees. For farms with five or less employees, it is sufficient for the inspector to interview the farmer.</td>
<td>MINOR</td>
</tr>
<tr>
<td>F6.17</td>
<td>Temperature shall be controlled in the housing of hatchlings.</td>
<td>At day one, temperature shall be at body temperature of hatchlings. After 20 days this shall be adjusted to outside temperature during daytime. Small Farmer Groups shall ensure that animals are not exposed to dangerous fluctuations in temperature.</td>
<td>MAJOR</td>
</tr>
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</table>

**PRINCIPLE 7: HEALTH**

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<tr>
<td>F7.1</td>
<td>A documented veterinary health plan (VHP) should be developed in consultation with a veterinarian.</td>
<td></td>
<td>RECOMMENDATION</td>
</tr>
</tbody>
</table>

*Not applicable for Small Farmer Groups*
| F7.2 | The VHP should have sufficient and detailed measures promoting positive animal welfare. | The following should be included in the VHP:  
- Prevention of illness or injury rather than treating disease  
- Avoidance of physical, nutritional or environmental stress  
- Lameness and other leg problems  
- Abnormal behavioral activities  
- Parasitic infections  
- Climatic conditions  
- Vaccinations and other methods to cope with diseases  
- Nutrition  
- Environmental conditions, such as manure management and run-off  
- Ranging and foraging area management  
- Exclusion of predators and controls of rats and mice  
- Euthanasia  
- Tolerance limits for mortality and follow up actions in case one exceeds the limit | RECOMMENDATION  
Not applicable for Small Farmer Groups |
| F7.3 | The farm personnel should follow the measures described in the VHP. |  | RECOMMENDATION  
Not applicable for Small Farmer Groups |
| F7.4 | A veterinarian shall pay regular visits at the farm to check on the health condition of waterfowl. If the veterinarian observes any waterfowl is not in a state of well-being sufficient and immediate measures shall be taken. | Veterinarian shall visit at least once in each growing season. Members of smallholder farmer groups can be excluded from this requirement at the discretion of the certification body. | MINOR  
Not applicable for Small Farmer Groups |
| F7.5 | Results of veterinary visits and follow up actions if necessary should be recorded. | Members of smallholder farmer groups may be excluded from this requirement. | RECOMMENDATION  
Not applicable for Small Farmer Groups |
<p>| F7.6 | The farmer should behave as a good caregiver, by checking the wellbeing of the waterfowl at least twice a day. | Small Farmer Groups shall ensure the wellbeing of their waterfowl. | RECOMMENDATION |
| F7.7 | Any sick or injured bird shall be treated immediately to minimize pain and distress. Treatment shall not be withheld in order to preserve a bird or flock's eligibility for market. |  | MINOR |</p>
<table>
<thead>
<tr>
<th>F7.8</th>
<th>A safe place, which is free of competition, shall be provided for sick and/or injured animals to recover.</th>
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<tr>
<td></td>
<td>Feed and water should be continuously available in sick pens. Pens should be checked at least twice daily and supportive care, with veterinary treatment if necessary, should be provided. Individual care and treatment records should be available and easily accessible at all times.</td>
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<tr>
<td></td>
<td>MINOR</td>
</tr>
<tr>
<td>F7.9</td>
<td>Growth hormones shall not be applied.</td>
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<td></td>
<td>MINOR</td>
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<tr>
<td>F7.10</td>
<td>A veterinarian should carry out any surgical procedures.</td>
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<td></td>
<td>RECOMMENDATION</td>
</tr>
<tr>
<td>F7.11</td>
<td>Waterfowl having pain or injury from which they are unlikely to recover shall be immediately and humanely euthanized in a way that renders the waterfowl immediately insensitive to pain.</td>
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<td></td>
<td>Workers shall be trained with the proper methodology for euthanasia (a swift, humane method).</td>
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<td>MINOR</td>
</tr>
<tr>
<td>F7.12</td>
<td>Records on administration of veterinary medicinal products or any intervention, mortality rate, number of limping, injured and euthanized waterfowl (reasons and methodology) should be maintained for at least three years or for the length of their validity, whichever is longer.</td>
</tr>
<tr>
<td></td>
<td>RECOMMENDATION</td>
</tr>
<tr>
<td></td>
<td>Not applicable for Small Farmer Groups</td>
</tr>
</tbody>
</table>

**PRINCIPLE 8: HYGIENE, PEST AND PREDATOR CONTROL**

<table>
<thead>
<tr>
<th>Nr.</th>
<th>REQUIREMENT</th>
<th>GUIDANCE</th>
<th>LEVEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>F8.1</td>
<td>Accommodation for waterfowl shall be regularly and thoroughly cleaned and disinfected according a cleaning policy.</td>
<td>At a minimum cleaning shall happen between flocks. Small Farmer Groups shall ensure clean bedding and shelter for their animals.</td>
<td>MINOR</td>
</tr>
<tr>
<td>F8.2</td>
<td>Appropriate hand washing facilities and toilets should be available for all personnel working on or visiting the farm.</td>
<td></td>
<td>RECOMMENDATION</td>
</tr>
<tr>
<td></td>
<td>Not applicable for Small Farmer Groups</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement (F8.x)</td>
<td>Description</td>
<td>Level</td>
<td>Recommendation</td>
</tr>
<tr>
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</tr>
<tr>
<td><strong>F8.3</strong></td>
<td>An effective written policy on control of visitors, vehicles and materials should be available, known by the responsible personnel and implemented.</td>
<td></td>
<td>The site should have a biosecurity plan for preventing the transfer of disease between farms. A written policy is required for operations with more than five employees. For farms with five or less employees, it is sufficient for the inspector to interview the farmer.</td>
</tr>
<tr>
<td><strong>F8.4</strong></td>
<td>Foot brush/disinfectant or barrier footwear systems should be provided at the entrance of the farm.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>F8.5</strong></td>
<td>No farm cats, dogs and other pets should be present in the waterfowl housing and shelter.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>F8.6</strong></td>
<td>Appropriate measures shall be taken to protect waterfowl from predators.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>F8.7</strong></td>
<td>Predator control should be humane.</td>
<td></td>
<td>The first line of defense should be fencing and other methods of excluding wildlife and dogs. Lethal predator control methods should not be used, especially indiscriminate methods that cause severe pain and suffering such as snare and leg-hold traps.</td>
</tr>
</tbody>
</table>

**PRINCIPLE 9: HANDLING AND MANAGEMENT OF WATERFOWL**

<table>
<thead>
<tr>
<th>Nr.</th>
<th>Requirement</th>
<th>Guidance</th>
<th>Level</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>F9.1</strong></td>
<td>Responsible personnel shall be trained on good practices for handling of waterfowl. Training records shall be kept for at least five years or for the length of their validity, whichever is longer.</td>
<td>A written plan is required for operations with more than five employees. For farms with five or less employees, it is sufficient for the inspector to interview the farmer.</td>
<td><strong>MINOR</strong> Not applicable for Small Farmer Groups</td>
</tr>
<tr>
<td><strong>F9.2</strong></td>
<td>There shall be no physical alterations of waterfowl such as:  - De-clawing  - Hole punching  - Wing clipping  - Trimming of feathers  - Castration</td>
<td>Trimming of large feathers is allowed if feathers become broken or damaged.</td>
<td><strong>MINOR</strong></td>
</tr>
<tr>
<td>F9.3</td>
<td>Bill trimming and de-beaking is prohibited.</td>
<td>MAJOR</td>
<td></td>
</tr>
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<td></td>
</tr>
<tr>
<td>F9.4</td>
<td>Glasses may be allowed to prevent fighting at breeding farms.</td>
<td>Where fighting is a problem, less drastic steps such as reducing the stocking density and providing a more complex environment are usually warranted.</td>
<td>RECOMMENDATION</td>
</tr>
<tr>
<td>F9.5</td>
<td>Measures shall be taken to minimize fighting and/or feather pecking by other waterfowl and other negative behaviors.</td>
<td>Flock size (too many waterfowl in one flock), dirty environment, nutritional problems might affect the occurrence of negative behaviors, such as fighting, smothering from panic, or competition for food and water. If the capacity of a barn is more than 3000, a separation wall shall be high enough that waterfowl are not able to see each other. Farms can also address the risk of panic by walking the flocks often, and exposing them to novel noises and new experiences starting when the birds are very young.</td>
<td>MINOR</td>
</tr>
<tr>
<td>F9.6</td>
<td>Hatchlings shall be not be thrown or dumped.</td>
<td>They shall be placed gently from a height of not more than 12 in (30.5 cm) or lower</td>
<td>MINOR</td>
</tr>
</tbody>
</table>
### PRINCIPLE 10: TRACEABILITY, IDENTIFICATION AND SEGREGATION

<table>
<thead>
<tr>
<th>Nr.</th>
<th>REQUIREMENT</th>
<th>GUIDANCE</th>
<th>LEVEL</th>
</tr>
</thead>
</table>
| F10.1 | The farmer shall maintain up-to-date procedures to ensure that all water- | Procedure on reception check shall require responsible personnel to check invoices and transport documents. Procedure shall be kept current to reflect the present situation. Furthermore a visual check (on color and quality if possible, to determine that there was no live-plucking) shall be required to verify compliance. Results of the visual check shall be documented indicating date and quantity of checked animals and signed by the responsible person. | MAJOR  
Not applicable for Small Farmer Groups |
|     | fowl over 3 days of age, arriving at the farm as certified, come from certified sources. | | |
| F10.2 | There shall be established procedures to manage reception and inspection of incoming birds, as well as the appointment of responsible personnel. | A written plan is required for operations with more than five employees. For farms with five or less employees, it is sufficient for the inspector to interview the farmer. | MINOR  
Not applicable for Small Farmer Groups |
| F10.3 | It shall be demonstrated that all incoming waterfowl arriving to the facility as certified originate from a certified source. For Small Farmer Groups, it shall be demonstrated that all incoming waterfowl arriving to the facility come from within the specific region. | Copy of the scope certificate of the supplier, clear identification of the certified waterfowl in the shipping and sales documents, reference to lot numbers shall be available. | CRITICAL MAJOR |
| F10.4 | Records on incoming and outgoing waterfowl shall be kept and maintained for 3 years, or for the length of their validity, whichever is longer. | Number of waterfowl and date of arrival and leave. | MAJOR  
Not applicable for Small Farmer Groups |
## 2. Slaughter Module

This module shall apply to any site where slaughtering occurs.

<table>
<thead>
<tr>
<th>Nr.</th>
<th>REQUIREMENT</th>
<th>GUIDANCE</th>
<th>LEVEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>S1</td>
<td>The site shall comply with local legislation on animal welfare.</td>
<td></td>
<td>MAJOR</td>
</tr>
<tr>
<td>S2</td>
<td>Personnel responsible for unloading, stunning and killing shall receive basic animal welfare training.</td>
<td>Staff shall be trained to recognize signs of distress, and injury, and be competent in bird handling and, if necessary, casualty slaughter. Staff shall never kick, strike, throw or deliberately injure a bird.</td>
<td>MINOR</td>
</tr>
<tr>
<td>S3</td>
<td>Training records shall be kept for at least five years.</td>
<td></td>
<td>MINOR</td>
</tr>
<tr>
<td>S4</td>
<td>After arriving at the slaughter site, waterfowl shall be handled with care and as minimally as possible.</td>
<td>Inspection of all birds upon arrival and ensure procedures are in place to deal with panting or huddling birds. Weigh (and record) trucks to monitor density.</td>
<td>MINOR</td>
</tr>
<tr>
<td>S5</td>
<td>Waterfowl shall be unloaded and slaughtered within two hours, unless the slaughterhouse has a waiting area with appropriate facilities.</td>
<td></td>
<td>MINOR</td>
</tr>
<tr>
<td>S6</td>
<td>In an industrialized slaughterhouse, waterfowl should be unloaded in a dimly lit room preventing stress and fear as much as possible. In case of open air slaughtering, other stress reducing measures should be implemented.</td>
<td>In any type of slaughter site, steps should be taken to prevent waterfowl from seeing other waterfowl get killed. This requirement is fulfilled if sufficient measures are taken to minimize stress of waterfowl from arriving to the slaughter site up to the moment of killing. The following stress reducing methods should be applied: planned arrival time at the slaughter facility so birds do not have to wait for long periods on transport vehicles; careful loading and unloading of birds; handling birds one at a time; minimizing the time between inversion and stunning; adjusting the water-bath height to fit the size of the birds.</td>
<td>RECOMMENDATION</td>
</tr>
<tr>
<td>S7</td>
<td>In an industrialized slaughterhouse, waterfowl shall be stunned then killed before they can regain consciousness.</td>
<td>Available best practice shall be utilized.</td>
<td>MINOR</td>
</tr>
<tr>
<td>S8</td>
<td>If electrical stunning applied; when using a 50 Hz AC frequency stunning, a minimum of 130 mA per bird should be applied.</td>
<td>RECOMMENDATION</td>
<td></td>
</tr>
<tr>
<td>-----</td>
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<td>----------------</td>
<td></td>
</tr>
<tr>
<td>S9</td>
<td>Stunning frequency should be checked 3 times per day and results recorded.</td>
<td>RECOMMENDATION</td>
<td></td>
</tr>
<tr>
<td>S10</td>
<td>Confirmation inspections should be done of supplier farms to confirm their compliance to RDS.</td>
<td>RECOMMENDATION</td>
<td></td>
</tr>
</tbody>
</table>
### 3. Transport Module

This module shall apply to any site transporting live animals, including farms and slaughter sites.

<table>
<thead>
<tr>
<th>Nr.</th>
<th>REQUIREMENT</th>
<th>GUIDANCE</th>
<th>LEVEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>T1</td>
<td>Transport shall comply with local legislation on animal welfare.</td>
<td></td>
<td>MAJOR</td>
</tr>
<tr>
<td>T2</td>
<td>Planning of transport shall ensure that waterfowl reach their destination as soon as possible, but in any case in a maximum of 8 hours.</td>
<td>Transport shall never take longer than 8 hours. Dependent on the local possibilities direct route shall be used, with no unnecessary stops to further decrease transport time.</td>
<td>MINOR</td>
</tr>
<tr>
<td>T3</td>
<td>Waterfowl shall be transported in a vehicle that provides sufficient ventilation and protection from wind, rain, snow and thermal stress.</td>
<td>Waterfowl shall not be transported during severe weather conditions unless enough protection is provided.</td>
<td>MINOR</td>
</tr>
<tr>
<td>T4</td>
<td>Waterfowl shall not be overcrowded during transport.</td>
<td>Based on average weight of waterfowl, the amount of waterfowl per container shall be determined before transport. Crates shall not hold more than 6 adult birds; recommendations are for .15 to .25 m² per bird. There shall be space for the birds to be comfortable and have adequate ventilation.</td>
<td>MINOR</td>
</tr>
<tr>
<td>T5</td>
<td>Transportation vehicle should be cleaned and dried prior to loading the waterfowl.</td>
<td></td>
<td>RECOMMENDATION</td>
</tr>
<tr>
<td>T6</td>
<td>Records of transport related mortality should be kept for each shipment of waterfowl unloaded for slaughter. Records should be kept for five years or for the length of their validity, whichever is longer.</td>
<td>Maximum limits for “dead-on-arrival” (DOA) birds should be established.</td>
<td>RECOMMENDATION</td>
</tr>
</tbody>
</table>
4. Small Farmer Group Module

This module shall apply for small farm groups. Small farms are those that meet the definition listed in the Definitions. Audit procedures for small farms are outlined in Appendix B.

<table>
<thead>
<tr>
<th>Nr.</th>
<th>REQUIREMENT</th>
<th>GUIDANCE</th>
<th>LEVEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>G1</td>
<td>The small farmer group shall consist of a homogeneous group of members with regard to their agricultural production, geographical location and economic situation.</td>
<td>Smallholder farms shall be located in one defined geographical area. The defined geographical area shall be identified with a list of villages. As a guideline the Certification Body can set a limit of maximum 100 waterfowl per household at one time.</td>
<td>MAJOR</td>
</tr>
<tr>
<td>G2</td>
<td>Used or recycled down is not accepted for the RDS.</td>
<td>Only down or feathers from birds raised on the small farm can be sold or traded as RDS inputs.</td>
<td>MAJOR</td>
</tr>
<tr>
<td>G3</td>
<td>The following documentation on the small farmer group shall be available:  - clearly defined map that shows the villages under certification  - collector(s)  - estimated number and type of waterfowl per village  - statements from collectors as listed below under G4  - quantity and type of down and feather products delivered by collectors</td>
<td>Collectors shall be issued unique identification numbers.</td>
<td>MAJOR</td>
</tr>
<tr>
<td>G4</td>
<td>Registered collectors shall have access to and be knowledgeable on the standard.</td>
<td>Small collectors collecting from households shall be registered by the final collector as an approved RDS collector and they shall be aware of the RDS requirements.</td>
<td>MAJOR</td>
</tr>
<tr>
<td>G5</td>
<td>Collectors shall provide documentation on:  - map with villages they source down and feather from  - quantity of feathers and down delivered.</td>
<td></td>
<td>MAJOR</td>
</tr>
</tbody>
</table>
| G6 | Collectors shall meet the following requirements and sign a statement undertaking:  
• that they only deliver down and feather under certification from the villages in the small farmer group.  
• down and feather under certification shall be separated and identified.  
• that they report as soon as possible to the certificate holder any practices non-compliant to this standard. | MAJOR |
| G7 | The scope certificate holder shall have procedures indicating actions to be taken in instances of non-compliance with the standard, sanctions and exclusion of members. | MAJOR |
| G8 | During farm visits by the Certification Body the findings of the Certification Body shall not significantly differ from the statements of the collector and the documentation of the small farmer group. | CRITICAL MAJOR |

During the farm visits the Certification Body shall get the impression of a well-functioning small farmer group.
5. Textile Exchange Content Claim Standard (TE CCS)

The Responsible Down Standard requires compliance with the requirements of the TE Content Claim Standard, whereby the Claimed Material is defined as:

Certified Down: any down from organizations that comply with the applicable modules of the RDS.

Additional guidance related to interpretations of the CCS requirements specified for down and feathers can be found in the RDS Implementation Manual.
6. Parent Farm Certification (optional)

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 here.

All parent farms that are included in the optional module shall comply with all of the Farm Module requirements.

For supply chains that elect to include the optional parent farms, a system shall be in place to ensure traceability\footnote{Traceability: The ability to identify the origin of a product by means of documented recorded identification. In general, tracing refers to going backward through time and the supply chain, while tracking refers to moving forward through time and the supply chain.} between the RDS certified raising farms or hatcheries and the parent farms.

There is no separate RDS label or grade for Parent Farm Certification. However, certification to the parent farm level will be confirmed in the scope and transaction certificates, so that the final seller of the product can make accurate claims about the parent farm level certification. Please refer to the RDS Labeling Guide for further information.

Any parent farm certified down shall be clearly indicated on the transaction certificates. For B2B communications only, this will be referred to as Parent Farm Certified (PFC) RDS.

If a parent farm or hatchery fails an audit, then that parent farm shall be removed from the supply chain of the company making the claim about parent farms. Alternatively, that company may choose to no longer make any claims that their supply chain has been certified to the parent farm level.
Appendix A - Audit Procedures

Relevant Definitions

Announced audit
The site is contacted in advance to set a date for the on-site audit.

Confirmation visit
Less than 1 hour notification; visual check for animal welfare compliance only. Confirmation visits are to be done in addition to full audits.

Semi-announced audits
Audits with up to 72 hour notice, to be sure that the facility is open and the correct people are available for the on-site audit.

Unannounced audits
The auditor gives a maximum of 2 months window within which the on-site audit will happen, and they arrive without any additional announcement. At the beginning of the certification year the Certification Body will advise the farmer of the window of time during which an on-site audit will happen, and that they are responsible to be present and have the required documents on hand during that time.

A1 Industrial Farms

A1.1 All first audits are announced for the first year of certification.

This is to introduce the farmer to the certification process, build good will towards the RDS, and to ensure that proper documentation and personnel will be on hand to complete the on-site audit.

A1.2 Subsequent years’ certification:
• Up to 1/2 announced on-site audits
• At least 1/2 semi-announced (maximum 72 hour notice) or unannounced on-site audits (2 month window)
• Minimum 5% confirmation visits on all farms; at least 10% confirmation visits of high-risk farms.

A1.3 All announced, semi-announced and unannounced audits will count as full audits and, as applicable, will involve management and worker interviews, document reviews and visual checks. Farms chosen for semi-announced or unannounced audits will be based on random selection and risk assessment by the CB, following the risk criteria listed below.

A1.4 The confirmation visits are at minimum visual inspections. Any critical major or major non-compliances that are found will be dealt with in accordance to the RDS.

A1.5 The percentages from A1.2 shall apply annually per certification body, and farms shall be chosen randomly and based on risk assessment by the CB, following the risk criteria listed below.

A2 Risk Criteria for Industrial Farms

A2.1 Selection of farms for semi-announced, unannounced audits and additional confirmation audits will be determined based on judgment of the Certification Body, using the following risk assessment:
• Results from previous audits
• Any third party information
• Parent farms
• Timing of the last audit
• Large size (greater amount of down that will be impacted)
• Regional practices (eg: force-feeding or live-plucking)
• Typical seasonal timing of live-plucking and/or force feeding
• Age at slaughter
• Prior approval to other animal welfare standards
• Local legislation
• Volume of down sold from a region
• Type of bird
• Decrease to price of the meat or increase to the price of down (which could create incentive to live pluck)
Appendix B - Small Farmer Groups

The standard allows for a group of small farms located in a defined geographical region to be audited as a single unit. Each group of farms is classified as a single unit, called a Small Farmer Group (SFG). This is a supply chain where the down is collected from small farms by collectors who either deliver to larger collectors or directly to the down traders and/or (pre)processors. Small farms (households) shall generally not have more than 100 waterfowl at one time.

The Small Farmer Group Module requires the identification and participation of local down collectors responsible for their respective regions. These parties will be interviewed and audited and provide documentation as described in the requirements below.

Appropriately establishing the area for the Small Farmer Group is very important to the credible application of the requirements of the module.

B1 Determining the Area for a Small Farmer Group

B1.1 When determining the area for a Small Farmer Group, the Certification Body should meet the following requirements:

- Local precedent for defining an area (for example: a locally recognized region, a province or state described by the country)
- An area set by the final collector
- An area with homogenous production methods, so that the practices of one Small Farmer may reasonably be assumed to be similar to other Small Farmers in the same area.
- Areas may be grouped together into a single region for the sake of inspecting and reporting, only if they all are at the same risk level, see below.

B1.2 The Certification Body shall verify the effectiveness and practices of the Small Farmer Group system through a yearly on-site audit including the following:

- Interviewing the collectors
- Assessing the documentation of the collectors
- Conducting visits to a certain amount of farmers and villages, as described below

B1.3 An initial risk assessment shall be conducted to determine the length of time spent inspecting an SFG. The criteria for risk assessment and a description of risk levels for the purpose of determining audit days are listed below.

- The Certification Body reserves the right to adjust the number of visits based on the result of its risk assessment, documentation review and interviews with collectors.

B2 Risk Criteria for Small Farmer Groups

B2.1 Certification bodies shall assess a region against the following risk criteria to determine the length of time to spend inspecting a given Small Farmer Group.

- Common practices in the region
- Results from previous audits in the area (if any)
- Third party information (if available)
- Proximity to areas where force feeding or live plucking are happening
- Level of control on the collector
- Number of collectors
• Whether collectors collect from non-RDS regions as well
• Level of legal enforcement
• Volume of down sold from a region
• Size of the area in question
• Typical seasonal timing of live-plucking and/or force feeding
• Level of legal enforcement and local legislation

B3 Determination of Audit Days

B3.1 Based on the level of risk for an area, it will be up to the Certification Body to determine the level of inspecting to be done to ensure that the requirements of the standard are being met, including both animal welfare and chain of custody.

B3.2 At a minimum, all areas shall be visited by an auditor, with interviews of households with waterfowl to confirm conformity with the requirements of the standard.

B3.3 Risk Levels shall be addressed as follows:

• Base – base level of audit days\(^1\)
• Medium – at least 1.5x base level of audit days
• High – at least 2x base level of audit days

For the first year, all areas will be assessed as at least Medium Risk Level.

B3.4 Base level calculation method shall be done by the CB and approved by Textile Exchange. The level will be determined by the size of the area (square kilometers).

\(^1\) Auditing days are defined as exclusive of travel to the area.
Appendix C - Contract Farm Requirements

Relevant Definitions

Contracted Farms
Farms that are raising waterfowl on behalf of a separate company or individual (the contracting company, e.g. a trader, slaughterhouse, or master farm). In order to qualify as contract farming, the following must be true:

- The contracting company shall provide all inputs: eggs or hatchlings, food, medication, veterinary care, logistics
- There is an agreement that the contracting company will buy the birds from the contracted farm, and that the contracted farm will sell the birds to the contracting company.

C1 Guidelines for use

C1.1 The standard allows for group certification of contracted farms supplying one company or individual (the contracting company). These farms are contracted by the company to raise waterfowl for direct sale to the company. The contracting company shall be considered the Certified Organization.

C1.2 Individual group members may not use the certification independently.

C1.3 An Internal Control System (ICS) shall be created to ensure compliance to the RDS by all Contracted Farms within the group. The ICS shall be used by the Certified Organization to manage compliance with the requirements of the standard by the Contracted Farms. The Certification Body will audit the ICS as well as a number of the farms within the group.

C2 Internal Control System Requirements

In order to qualify for Contract Farm Group certification, the Certified Organization shall establish an Internal Control System. All Contracted Farms are subject to the farm and transport modules of the RDS, if applicable. The ICS shall meet the guidelines listed below:

a. A documented management structure of the ICS
b. Documentation of annual inspections of all group members, with the specific purpose of checking compliance with the requirements of the RDS
c. Signed membership agreements with each Contracted Farm, specifying rights and obligations of group members to comply with the standard and permit inspections by the ICS inspectors as well as audits by the Certification Body
d. All Contract Farm Group members shall have access to a copy of the RDS or the relevant sections of standard
e. All Contract Farm Group members shall understand the relevant requirements of the standard and be aware of consequences of non-compliance and sanctions

C3 Contract Farm Group Requirements

The Contract Farm Group of a company applying for RDS Certification shall meet the following requirements:

a. A manager or management group shall be responsible for implementing the ICS
b. Contract Farm Group members shall be provided with training regarding the RDS
c. Mechanisms shall be in place for addressing conflicts of interest
d. An internal inspection protocol shall be described and implemented to ensure the RDS require-
ments are met
   e. Parallel production is not allowed.
   f. Mechanisms shall be in place to enforce corrective action for cases of RDS non-compliance.
   g. Procedures shall be established for accepting new members, ensuring that acceptance happens only after internal inspections.
   h. Risk assessment shall be conducted and acted upon accordingly, following the risk criteria listed below.
   i. Records shall be kept and maintained of the following:
      1. Maps / sketches of all Contracted Farms where waterfowl are located
      2. Complete list of Contract Farm Group members
      3. Farm records showing numbers of waterfowl, purchase of eggs or hatchlings, purchase and sales of live waterfowl, and all other records required by the RDS
      4. Signed member agreements
      5. Records of internal inspection results
      6. All records are to be held for a minimum of three years

C4 Certification Body Requirements
C4.1 The Certification Body shall verify the effectiveness and practices of the Contract Farm Group ICS through a yearly on-site audit including the following:
   a. Reviewing the Internal Control System management
   b. Assessing the documentation of the Internal Control System
   c. Conducting visits to a certain number of Contract Farm Group members, as described below

C4.2 Yearly audits of the group shall be carried out by the Certification Body. In the case of large groups, the audits may be divided into separate visits in order to address risk.
   a. The CB shall assign inspectors who have had specific training on audit of ICS
   b. The CB shall conduct a risk assessment of the Contract Farm Group, to determine the minimum number of on-site audits of individual farms
   c. The on-site audit shall include an assessment of the ICS, its effective application and of compliance with the RDS requirements

C4.3 In evaluation of the ICS the CB shall determine whether:
   a. All internal control documentation is in place.
   b. Internal inspections of all group members have been carried out at least annually.
   c. New group members are only included after internal inspections, according to procedures agreed upon by the CB.
   d. Instances of non-compliance have been dealt with appropriately by the ICS and according to a documented system of sanctions.
   e. Adequate records of inspections have been maintained by the ICS.
   f. The group members understand the standards and that any excerpted, translated or otherwise interpreted versions of the official standard adequately cover all relevant aspects of production.

C4.4 On-site audit of a sample of Contract Farm Group members shall be undertaken to evaluate the effectiveness of the ICS.

C4.5 In standard cases, the minimum number of on-site audits by Certification Bodies is determined by the square root of the number of all the farms. Farms will be chosen randomly and based on risk assess-
ment by the CB, following the risk criteria listed below. If the on-site audits of a standard risk Contract Farm Group show variation in farming practices, or variation from the ICS, the CFG shall be considered high risk.

C4.6 For high risk Contract Farm Groups, the number of on-site audits by Certification Bodies will be adjusted to reflect the risk level, according to the table below.

C4.7 On-site audits will be conducted for all Parent Farm members of a Contract Farm Group.

*The numbers listed represent the minimum number of re-audits for each level of risk.*

*Minimum amount of growers to be re-inspected by external inspectors:*

<table>
<thead>
<tr>
<th>Number of group members</th>
<th>Standard risk factor</th>
<th>High risk factor (x 2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;100</td>
<td>10</td>
<td>20</td>
</tr>
<tr>
<td>&gt;100</td>
<td>Square root of number of group members</td>
<td>2x square root of number of group members</td>
</tr>
</tbody>
</table>

All non-compliances that are found will be dealt with in accordance to the RDS.

C5 Risk Criteria for Contract Farm Groups

Certification bodies shall assess Contract Farm Groups against the following risk criteria to determine the minimum number of on-site audits for a given Contract Farm Group:

- Common practices in the region
- Results from previous audits in the area (if any)
- Third party information (if available)
- Proximity to areas where force feeding or live plucking are happening
- Level of legal enforcement
- Volume of down sold from a region
- Size of the area in question
- Timing of the last audit
- Large size (greater amount of down that will be impacted)
- Regional practices (eg: force-feeding or live-plucking)
- Typical seasonal timing of live-plucking and/or force feeding
- Age at slaughter
- Prior approval to other animal welfare standards
- Local legislation
- Volume of down sold from a region
- Type of bird
- Decrease to price of the meat or increase to the price of down (which could create incentive to live-pluck)