

Responsible Down Standard International Working Group

Audit Methodology

June 7, 2018

Agenda:

- Introductions, Announcements, and Housekeeping
- Updates
- Review of Audit Methodology

Audits to the RDS:

Definitions:

Announced audit

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

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.

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.

Audit Details:

- All first audits are announced for the first year of certification.

- Subsequent years' certification: no more than half of farms shall have announced audits, remaining shall be semi-announced (maximum 72 hour notice) or unannounced on-site audits (2 month window)
 - Minimum (*additional*) 5% confirmation visits on all farms; at least 10% confirmation visits of high-risk farms. (Visual inspections)
- All audits will count as full audits and, as applicable, will involve management and worker interviews, document reviews, and visual checks.

It is a challenge to have fully unannounced audits because, if you don't have workers present then you can't fulfill all of the audit, there is also a chance there won't be any birds on the farm.

The only specific feedback we have received about Audit Methodology is Animal Rights activists would like us to have only unannounced audits.

Comment: Biosecurity is a serious issue when it comes to unannounced audits.

Proposed Changes:

- We might want to have requirements for auditors to fulfill in terms of biosecurity. If auditors were prepared for biosecurity risks then it could help limit the risks of biosecurity issues on the farms.
- If the RDS requires a biosecurity plan then the auditor would have an idea of what farms are expecting of them.
 - If the auditor can prove there has been no other species they have been in contact with within 42-72 hours.
- The biosecurity plan could be part of the audit application.

Questions:

- How well are the audits working in general? Have the unannounced inspections been generally easy or difficult?

Answer: It can be difficult especially in China. When the auditors go they go with someone who knows where the place is. They are not easily able to be found otherwise. The farms can also move and they won't give notice.

- Did the results of the audits vary drastically when announced, vs. unannounced, vs. semi announced? In terms of visible violations.

Risk Criteria:

We have listed out risk criteria but have not shown what risk assignment looks like.

- 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)

Proposed Changes:

- First year audits should maybe be considered higher risk because they may not understand the standard as well yet.

Comment:

Based on sites that have not been compliant in previous audits.

Contract Farm Group:

What is a contract farm?

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.

Contract Farm Group Certification:

- Individual group members may not use the certification independently
- An Internal Control System (ICS) shall be created to ensure compliance to the RDS by all Contracted Farms within the group
- All Contracted Farms are subject to the farm and transport modules of the RDS, if applicable.
- ICS is audited by the CB
- Sample of farms are audited by the CB

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 documented management structure of the ICS
 - Documentation of annual inspections of all group members, with the specific purpose of checking compliance with the requirements of the RDS
 - 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
 - All Contract Farm Group members shall have access to a copy of the RDS or the relevant sections of standard
 - All Contract Farm Group members shall understand the relevant requirements of the standard and be aware of consequences of non-compliance and sanctions
- Manager in place
- Membership agreements in place, how to accept new members
- Internal inspection protocol

- Proper record keeping

Contract Farm Group Audits:

- Yearly on-site audit of the ICS, including risk assessment
- Risk level determines the number of farms audit
- Farms chosen for on-site audit, randomly and according to risk

Number of group members	Standard risk factor	High risk factor(x 2)
<100	10	20
>100	Square root of number of group members	2x square root of number of group members

Questions:

- Who is doing the normal square root audit?
- Answer: This is in reference to the audits by the Certification Body.

Risk Criteria – Contract Farm Groups:

- 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 (e.g. 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)

Questions:

- Whether the animal welfare is higher in small farm groups compared to industrial farm groups or if there is no difference?

Reminders:

- Have you signed the RDS IWG Charter?**
- Do we have your permission to be publically listed?**
- Any other questions or feedback:**
ResponsibleDown@TextileExchange.org

Thank you!