



Responsible Down Standard 3.0 Feedback Summary

Published June 28, 2019

This document provides a summary of the comments received during the Public Stakeholder Review of the Responsible Down Standard (RDS). It includes a summary of all comments received related to the revision, the RDS International Working Group's response to the feedback, and how the issues were addressed. A full list of all comments received is available upon request.

Draft Consultation Period: December 15, 2018 through February 28, 2019

1. Participation

In total, 41 stakeholders participated in the Public Stakeholder Consultation. Feedback was received from Brands and Retailers, Animal Welfare organizations, the Supply Chain (both current users of the Standard and prospective users), and a Certification Body.

Total number of stakeholders: 41

- Brands/Retailers: 24
- Supply Chain: 7
- Civil Society: 12
- Certification Body: 1

Stakeholders from the following regions participated:

- Asia: 1
- Western Europe: 30
- Eastern Europe: 1
- North America: 9
- Australasia: 2

The feedback from Brands and Retailers was primarily from the United States and Western Europe. We were happy to receive feedback from a key supplier in China and from one in Eastern Europe. These are very important regions of supply and more feedback from supply chains in these regions would have been useful.

2. Analysis of Comments Received During the Public Stakeholder Consultation

The comments received during the Public Stakeholder Consultation (we have only included those related to the proposed changes) were related to the allowance of Infra-red bill trimming, lighting and housing, outdoor access, parent farm observation, supply chain disclosure, and several other areas.



General Points of Feedback

Scope

One stakeholder (brand) suggested adding social and environmental criteria at the Farm and Slaughterhouse level.

There was one comment that suggested removing the Optional Parent Farm module. *"Since we are not certifying the mother farms they interpret that we do not care of the animal welfare of the "mothers". If possible please delete the option for parent farm completely, to avoid further problems."*

Final RDS 3.0 Results:

- **The Scope of the RDS has not been adjusted to include social and environmental criteria. This will be revisited in future revisions.**
- **The Parent Farm Certification option has not been removed. This module has broad support within the IWG.**

MINOR Criteria

In general, there were a number of criteria that were proposed to be bumped from MINOR to RECOMMENDATION. The decision to adjust these criteria was based on the following factors:

1. Textile Exchange has changed the definition of MINOR criteria. Previously, it was a category of requirements for which 50% had to be met in order to pass certification. Now the definition is adjusted to mean a requirement that is fully required for certification, but allows 60 days for corrective action.
2. Based on feedback from auditors, we concluded that if all previous MINOR criteria were moved to the new definition of MINOR, this could be a high burden for some users of the standard. A higher priority was placed on criteria such as euthanasia, stunning before slaughter, and parent farm observation.

We received some comments in support of the new definition of MINOR, with one suggestion to apply these all to Small Farmer Groups. There were some concerns that compliance with all current MINOR criteria presented a significant increase in the burden of the standard on farms, that surpassed the rate the industry could change.

Final RDS 3.0 Results:

- **This updated definition of MINOR has stayed in the standard, due to support from the IWG. Not all of the previous MINOR requirements are still categorized as MINOR. Some were downgraded to RECOMMENDATION in order to prevent raising the burden for farmers too quickly.**



Training

One statement of support for the current draft of the RDS Training Packet, with a suggestion to make it clearer how binding the training is. Recommended to make training a mandatory part of the RDS.

RDS 3.0 Result

- **Training is required, see Management in Section C.**
- **The RDS 3.0 Training strategy will be covered as part of the upcoming webinar to introduce the RDS 3.0.**

Supply Chain Disclosure (General)

The proposed change was to allow suppliers to disclose non-RDS sources:

“RDS Companies may choose to have their non-RDS sources reviewed for risk of live-plucking or force-feeding.” The module for this voluntary disclosure was outlined in the document: *Supply Chain Disclosure*.

There were 16 statements of general support (8 animal welfare groups, 9 brands) for the option for suppliers to disclose their suppliers as a measure of demonstrating their due diligence to prevent the purchase of live-plucked down or feather material or material purchased from force-fed birds. One brand stated that this should be mandatory rather than optional. It was noted that more editing may be necessary on the *Supply Chain Disclosure* document.

It should also be noted that this will present challenges in the area of data privacy. It would not be allowed to show the full supply chain without getting the consent of all sub-suppliers, therefore if only one supplier in the chain denies or ignores the disclosure request, then a supplier cannot show the full supply chain.

RDS 3.0 Results

- **This has been removed from RDS 3.0, but there are still plans to develop and pilot this option. This could potentially be added to the standard in a minor revision in the future.**

Farm Requirements

Access to drinking water (F5.1)

There was mostly support for this statement, with one suggestion to request water quality test results.

RDS 3.0 Results:

- **This is now AW1.3, and the wording has been adjusted to, “Waterfowl shall be provided with a supply of clean, fresh, and safe drinking water.”**
- **Regular testing of water has been included as a RECOMMENDATION.**

Access to food (F5.2)

Suggestion to add more guidance on the application of the 8-hour maximum time without food: does it apply at slaughter? What about at night?

RDS 3.0 Results:

- **This is listed as a RECOMMENDATION (AW1.2.2)**
- **Guidance for this point will be clarified in the RDS 3.0 User Manual. There is also clarification in the transport module, AW4.6.1. This is not applicable at the Slaughter module.**

Veterinary Health and Welfare Plan – Plan for water access (F5.3)

There was a question about whether this is in addition to language from RDS 2.0 or intended to replace that language (F5.3 “A written feeding plan shall be available ensuring that the nutritional requirements of the waterfowl are being met.”). Will check the final version to make sure that there are no repeats.

RDS 3.0 Results:

- **All written plans are listed in the Management Module. See AW5.3.2.**

Nesting Areas (F6.2)

Two brands commented that this criterion should be MAJOR and not RECOMMENDATION.



RDS 3.0 Results:

- **This is now AW3.11 and has been upgraded to a MINOR, which is required for certification.**

Housing Provision (F6.3)

The proposal was to make this a MINOR. There were several stakeholders who felt this should be a MAJOR requirement due to the importance.

It should be noted that the intention with listing it as a MINOR is that it will still be required, but may take longer than 30 days to correct, under the assumption a building may actually need to be constructed. Textile Exchange has proposed to use the MINOR category for all infrastructure and documentation related criteria, which would be consistent with the Responsible Wool Standard.

RDS 3.0 Results:

- **This is now AW2.1 and is classified as a MINOR. This is required for certification. Because sites without housing would need to construct adequate shelter, the MINOR categorization is more appropriate to give them enough time to correct the non-conformity.**

Clean Housing (F6.5)

There were four comments in agreement with the proposed change to required that housing be clean and well-ventilated.

Commented [TG1]: Numbers below twelve should be written out

There was a suggestion to set an ammonia limit and require testing (recommended 10 ppm, but no more than 25 ppm).

In opposition to the proposed change, one stakeholder mentioned that the level of ammonia is a factor of the weather conditions and available technology. "Avoiding the smell of ammonia is simply impossible."

RDS 3.0 Results:

- **AW2.2 is now: "Shelters and housing (including nesting areas) shall be clean and well ventilated." Categorized as a MAJOR.**
- **There is also a RECOMMENDATION that housing not have a strong ammonia smell.**



Natural Light (F6.6)

Three stakeholders suggested to make this a requirement, at least a MINOR instead of a RECOMMENDATION, as was proposed.

RDS 3.0 Results:

- **This is now AW2.7.1 and has remained a RECOMMENDATION.**

Minimum hours of reduced lighting (F6.7)

There were several statements that “reduced lighting” was too vague and it needed to be clear that natural cycles of light and near darkness are necessary for animal welfare.

One suggestion to go back to the previous wording: “8 hours of darkness.”

RDS 3.0 Results:

- **This is now AW2.7 and the language “reduced lighting” has been removed and replaced with “darkness – or near darkness.”**

Flooring of the Housing (F6.9)

One clear statement of approval for the suggested change to MAJOR.

A few comments that the requirement should focus on the desired outcome (clean and safe) and allow mesh flooring.

RDS 3.0 Results:

- **We adjusted the wording to make the desired outcome the focus, rather than the type of flooring: AW2.4 “dry, safe, and comfortable footing.”**
- **There is a new RECOMMENDATION not to use wire mesh as flooring.**

Outdoor Space (F6.12 and F6.13)

There were several comments expressing concerns with requiring outdoor access when this could create a risk of exposure to disease or epidemics. In some cases, local regulations may even prohibit outdoor access where there is a bird flu epidemic.



We have also been informed that the Chinese government is considering broad adoption of a farming system of birds kept intensively, in cages inside. As this is a key sourcing region and also a big risk to animal welfare, it was suggested that Textile Exchange monitor the situation closely.

One stakeholder also suggested to put in a requirement on the number and size of exits required, to ensure that free outdoor access was truly free.

One stakeholder did not agree with changing F6.13 (consistently dry outdoor space) to a RECOMMENDATION.

RDS 3.0 Results:

- **This is now AW2.9 and is a MINOR due to the connection to infrastructure.**
- **We will include updated guidance about the role that legislation may play here. Certification bodies will be informed that they should check into applicable legislation in the case that there are conflicts with RDS criteria.**
- **F6.13 is now AW2.9.1 and is still a RECOMMENDATION.**
- **“Sufficient exits” has been added as a RECOMMENDATION, AW2.9.3.**

Access to Water for Behavioral Needs (F6.14)

Two stakeholders suggested that access to water deep enough to swim without touching the bottom should be a MAJOR instead of a RECOMMENDATION.

One stakeholder mentioned that access to water deep enough to dip their heads should a MAJOR.

One stakeholder suggested that deep water could create risks of exposure to disease as it would attract migratory birds.

RDS 3.0 Results:

- **There was a lot of discussion on this point, but there are too many places where providing pools of water for swimming also poses risks of spreading disease, especially from passing bird species.**
- **Access to water for behavioral needs is now AW2.8 and is a MINOR. AW2.8.1 specifies the water shall be deep enough to dip their heads. It is a RECOMMENDATION to have water for swimming, but not required for certification (AW2.8.2).**



Record Keeping (F8.3)

One statement that the additional level of administrative work required is too burdensome for farms.

One suggestion to provide a list of potential emergency situations.

One statement in opposition to the documentation of lame birds, “involves a great deal of administrative work.”

RDS 3.0 Results:

- **The documentation of lame birds has been removed from the record keeping requirements: AW5.4.**

Provision of Animal Hospital (F7.8)

One comment suggested that this should be MAJOR rather than MINOR.

This was given a MINOR categorization due to the fact that it may take longer than 30 days for a farm to have the infrastructure for a separate space for sick or injured birds.

RDS 3.0 Results:

- **This is now AW3.7 and has been upgraded to a MAJOR.**

Growth Hormones (F7.9)

Two statements in opposition of making this a RECOMMENDATION, suggestion to move to MAJOR.

RDS 3.0 Results:

- **This is now AW1.2.4 and is now a MAJOR.**

Surgical procedures (F7.10)

Two statement of agreement with this proposed change.

RDS 3.0 Results:



- **This is now AW3.5 and is a MAJOR.**

Euthanasia (F7.11)

There was unanimous support for the proposal to make Euthanasia a MAJOR requirement. No opposition to this change was submitted.

There were additional comments of suggested edits on a few of the sub-points for the requirement:

- Birds that are showing no signs of recovery from illness after a period of 3 days
- Suggest to allow percussive blow to the head as acceptable, see EU legislation.
- Clarification should be added here to specify that this must not mean that birds needing euthanasia do not get euthanized or that unqualified people do it (since this is a 'shall' not a 'should'). (e.g. A single worker or veterinarian shall not cull more than 70 birds in a day unless this is required for bird welfare or where other qualified and experienced people are not available.)"
- Birds should be confirmed dead immediately, and not until "before disposal."

RDS 3.0 Results:

- **This is now AW3.13**
- **We have made several wording changes to add clarity, see the full requirements.**
- **We have also introduced some guidance to Certification Bodies that farms shall be audited against the training and plan portions of this requirement, but they do not need to show records of euthanasia until after July 1, 2021. This is to provide time for proper training and implementation in regions where this is not historically practiced.**

Predator Control (F8.6)

One statement that this should more closely align with the RWS (see page 40 of RWS for the criteria). Suggestion to add more clear definition of guidance for what is considered humane. Suggestion to change to MINOR.

RDS 3.0 Results:

- **This is now AW2.11.1 and is now a MINOR.**
- **Guidance will be added to the RDS User Manual on what is considered humane.**



Bill Trimming (F9.4)

The List of Proposed Changes included a proposal to allow infra-red bill trimming. There were 34 comments in opposition to this change. It was largely perceived as a “downgrade” in animal welfare and a weakening of the standard. The majority of these comments were from brands and animal welfare organizations, as well as two suppliers. Throughout the course of the discussion with the IWG and in the Consultation feedback, animal welfare organizations have unanimously opposed a decision to allow infra-red bill trimming.

There were two comment from suppliers in support of the proposed change to allow Infra-Red Bill Trimming.

This will be a key area for the IWG to review and come to a final decision, likely through another vote.

RDS 3.0 Results:

- **This is now AW3.9 and the standard will maintain the ban on infra-red bill treatment (or trimming).**
- **The IWG did hold a separate vote on the issue, and while there remain some members that support allowing the practice of infra-red bill treatment (or bill trimming), the majority of IWG members do not.**
- **This issue will not be considered in future revisions of the standard.**



Transport Requirements

Overcrowding (T6)

One statement of agreement.

There were three statements that proposed changes to the density criteria:

- Add a size to define what a crate is (Brand).
- Delete number of birds per crate, instead refer to appropriate number of birds per crate (Supplier).
- Add maximum stocking densities for crates used in transport (Animal Welfare).

RDS 3.0 Results:

- **This is now AW4.5.**
- **Guidance will be added to the above suggestions.**
- **The IWG did hold a separate vote on the issue, and while there remain some members that support allowing the practice of infra-red bill treatment (or bill trimming), the majority of IWG members do not.**

Slaughter Requirements

General Suggestions:

Additional details need to be added on slaughter parameters including:

- maximum time shackled (no more than 50 seconds)
- minimum time in contact with electric current (4 seconds)
- maximum time between stun and cut (no more than 10 seconds)

Direction may be taken from the RSPCA UK detailed duck standards.
(<https://science.rspca.org.uk/sciencegroup/faranimals/standards/ducks>)

RDS 3.0 Results:

- **These points will be added in the guidance in the *RDS User Manual*.**

Proper Handling (S2)

The following suggestions were proposed:

- Add wording that staff should not cause pain or distress.
- Birds should be checked before being loaded on the truck, and as they are unloading.

RDS 3.0 Results:

- **This is now AW6.4 and mentions preventing distress.**
- **Guidance on loading and unloading is included in AW6.3 as well as in the Transport module, AW4.9.**

Unloading within two hours (S3)

Suggestion to add a maximum time that birds can be in lairage (i.e. waiting area with appropriate facilities), also birds should not be kept in areas for two hours without shade and appropriate temperature control.

RDS 3.0 Results:

- **This is now AW6.5. We will add this guidance in the *RDS User Manual*.**



Stunning before slaughter (S5)

There were 15 statements of support was offered to the Proposed Change that stunning prior to slaughter be a MAJOR requirement. There was also a desire to see these changes applied to small-scale farms as well, some mentioned in future versions, and one person mentioned that it should be in this revision.

RDS 3.0 Results:

- **This is now AW6.8.**
- **We have also introduced some guidance to Certification Bodies that slaughter sites shall be audited against the training and plan portions of this requirement, but they do not need to show records of stunning until after July 1, 2021. This is to provide time for proper training and implementation in regions where this is not historically practiced.**

Parent Farm Observation (S8)

There were 14 general statement of support for increased observation of the Parent Farm, listed here as the responsibility of the Slaughterhouse. This included an added suggestion that visits of Parent Farms of Certification Bodies be all unannounced, and with an accounting of the number of Parent Farm visits occurring under the RDS.

There was no opposition to the suggestion to add observation of the Parent Farm stage in industrial goose supply chains. There was however, one statement of opposition to requiring farms to disclose their suppliers of eggs or hatchlings. This disclosure would be required in many supply chains if we want to begin parent farm observation.

RDS 3.0 Results:

- **This has been rewritten to be clearer. The intention is that industrial goose supply chains shall be responsible for ensuring that their parent farms are not live-plucking. This is outlined in F1.5.**