

NSF International Standard

NSF 451 - 2016

Global Traceable Down Standard



NSF International, an independent, not-for-profit, non-governmental organization, is dedicated to being the leading global provider of public health and safety-based risk management solutions while serving the interests of all stakeholders.

This Standard is subject to revision.
Contact NSF to confirm this revision is current.

Users of this Standard may request clarifications and interpretations, or propose revisions by contacting:

Chair, Expert Review Committee on Global Traceable Down Standard
c/o NSF International
789 North Dixboro Road, P. O. Box 130140
Ann Arbor, Michigan 48113-0140 USA
Phone: (734) 769-8010 Telex: 753215 NSF INTL
FAX: (734) 769-0109
E-mail: info@nsf.org
Web: <http://www.nsf.org>

NSF International Standard

Global Traceable Down Standard

Standard Developer
NSF International

Prepared by
The NSF Expert Review Committee on Global Traceable Down Standard

Published by

NSF International
PO Box 130140, Ann Arbor, Michigan 48113-0140, USA

For ordering copies or for making inquiries with regard to this Standard, please reference the designation “NSF 451 – 2016.”

Copyright ©2016 NSF International
Previous Editions, ©2015

Unless otherwise specified, no part of this publication may be reproduced or utilized in any form or by any means, electronic or mechanical, including photocopying and microfilm, without permission in writing from NSF International.

Printed in the United States of America.

Disclaimers

NSF, in performing its functions in accordance with its objectives, does not assume or undertake to discharge any responsibility of the manufacturer or any other party. The opinions and findings of NSF represent its professional judgment. NSF shall not be responsible to anyone for the use of or reliance upon this Standard by anyone. NSF shall not incur any obligation or liability for damages, including consequential damages, arising out of or in connection with the use, interpretation of, or reliance upon this Standard.

Participation in NSF Standards development activities by regulatory agency representatives (federal, local, state) shall not constitute their agency's endorsement of NSF or any of its Standards.

The illustrations, if provided, are intended to assist in understanding their adjacent standard requirements. However, the illustrations may not include **all** requirements for a specific product or unit, nor do they show the only method of fabricating such arrangements. Such partial drawings shall not be used to justify improper or incomplete design and construction.

Unless otherwise referenced, the annexes are not considered an integral part of NSF Standards. The annexes are provided as general guidelines to the manufacturer, regulatory agency, user, or certifying organization.

This page is intentionally left blank.

Contents

- 1 General 1
 - 1.1 Purpose 1
 - 1.2 Scope 1
 - 1.3 Certification levels 2
 - 1.4 Principles 3
 - 1.5 Audit methodology 4
 - 1.6 Continuous improvement 8
- 2 Normative references 8
- 3 Definitions 8
- 4 Supply chain applicability and requirements 10
 - 4.1 Intended users of this Standard 10
- 5 Certification program requirements 19
 - 5.1 Identification of products for certification 19
 - 5.2 Certification process 19
 - 5.3 Implications of non-compliance 19
 - 5.4 Surveillance audit 20
 - 5.5 Recertification audit 21
- Annex A 1

This page is intentionally left blank.

Suggestions for improvement of this Standard are welcome. This Standard is maintained on a Continuous Maintenance schedule and can be opened for comment at any time. Comments should be sent to Chair, Expert Review Committee on Global Traceable Down Standard at standards@nsf.org, or c/o NSF International, Standards Department, P.O. Box 130140, Ann Arbor, Michigan 48113-0140, USA.

This page is intentionally left blank.

NSF Standard for Global Traceable Down Standard

Global Traceable Down Standard

1 General

1.1 Purpose

Down is considered a by-product of the waterfowl meat industry where the meat is the primary source of revenue. Nonetheless, brands making products using down have an impact on the welfare of animals, the environment, and the communities in their down supply chain.

This Standard is the framework of a down supply chain animal welfare and traceable content claims assurance program. This Standard will be revised as new traceability and animal welfare legislation and best practices emerge.

1.2 Scope

The scope of the Global Traceable Down Standard (referred to as TDS) encompasses animal welfare, including the unacceptable practices of force feeding live plucking, and molt harvesting along with traceability, from parent farm to factory, to ensure the compliant down and feather material can be documented as the material used in finished, certified goods.

The purpose of the Global Traceable Down Standard is to provide the highest assurance that the down in finished goods and other household products comes from a responsible source that respects animal welfare. The only way to achieve this is to evaluate every link in the supply chain from the parent farm to the finished good manufacturer for: 1. animal welfare including non-force feeding and non-live plucking, 2. traceability management systems, including documents, showing an unbroken chain of custody of the down, and 3. Education for suppliers involved in the down supply chain to (a) raise awareness of animal abuses that change behavior and attitudes towards the care and treatment of water fowl animals and (b) instruction on implementing and maintaining good traceability practices.

1.2.1 Animal welfare

The Global Traceable Down Standard provides product content claims assurance that down and feather material have been produced without causing unnecessary harm to animals and focuses on compliance with local legal animal welfare regulations and ensuring that the down and feather material does not come from farms that engage in force feeding or live plucking. Animal welfare is evaluated from the parent farm through to the slaughterhouse. Visual verification of animal welfare shall be assessed at time of time of bird raising and slaughtering, including no force feeding or live plucking.

Animal welfare is based on local legal compliance, and where law is silent, on best practices based on International Finance Corporation Good Practice Note on Animal Welfare in Livestock Operations (see summary in Annex A).

1.2.2 Traceability

The Global Traceable Down Standard looks for and evaluates traceability systems in place throughout the entire supply chain, including, but not limited to, parent farms, hatcheries, breeding and intermediary farms, slaughterhouses, down processors, down wholesalers, transport vessels and finished goods manufacturers and assesses the following critical important areas:

- Traceability management systems, which includes: policies, procedures, accountability, training, implementation, communication, monitoring, and continuous improvement;
- Linking chain of custody documents from parent farm to finished goods factory;
- Labeling traceable down at every stage of the supply chain;
- Not allowing the blending of traceable down with conventional/non traceable down;
- Segregation/separation of traceable down at every level of the supply chain; and
- Management and worker training and education at every level of the supply chain;

1.2.3 Supplier education

Education of the suppliers regarding good traceability and animal welfare practices is key to the success of the Standard because ongoing instruction supports continuous improvement and sustainable compliance to the Global Traceable Down Standard. Training and education occurs throughout the business partnership, including during assessments at every level in the supply chain. Education includes guidance on how to improve supplier's traceability and animal welfare systems, and fosters sharing of best practices within and between supply chain links.

NOTE – The Standard does not measure the performance or quality of the down.

1.3 Certification levels

The Global Traceable Down Standard allows for two categories of certified supply chains: “Conformant” and “Advanced” levels.

A. Conformant level certification is intended to provide an entry point for supply chains that include down collectors as entities. Down collectors typically source from a very large number of Household scale producer (HSP) farms that raise geese and ducks for their own consumption. Depending on the country and the animal type in question, small farms may represent an increased risk of live plucking. For conformant level certification, collectors are permitted to be included, provided that a sample of HSP sites undergo onsite audits, depending on the assigned risk level outlined within this Standard.

B. Advanced level certification is intended to provide the highest Standard of assurance of animal welfare in the down supply chain as sites can be fully mapped to the parent bird farm. In this level, no collector based supply chains are permitted. Only down sourced directly from audited and certified meat supply chains may be considered “Advanced”.

In the event that a supply chain features down sourced from both collector and industrial based supply chains, certification must be obtained separately for these supply chains. In other words, the supplier may seek Conformant certification for the collector based supply chain products, while seeking an Advanced level certification for the industrial supply chain.

C. Certification to the TDS can be issued for the product and for the specific supply chain components. To ensure full compliance with the requirements of the TDS, there will be certificates presented to the sites and full disclosure of listing details available online.

The below table has been developed that explains the differences between the « Conformant » and « Advanced » levels of the Global Traceable Down Standard certification:

Table 1

	Conformant (Collector)	Advanced (Industrial)
Industrial Parent farm	N/A	Yes
Hatchery	N/A	Yes
Industrial raising farm	N/A	Yes
Household Scale Producer	Yes	N/A
Collector	Yes	N/A
Slaughterhouse	N/A	Yes
Broker	N/A	Yes
Pre-processor	Yes	Yes
Processor	Yes	Yes
Finished good	Yes	Yes

1.4 Principles

Notwithstanding the certification level sought by a supply chain, the following principles form the basis for the Global Traceable Down Standard:

- a) Down and feather shall not be removed from live animals. Animals shall not have been live plucked or molt harvested at any stage in the supply chain;
- b) Down and feather shall not be from animals that are force fed during their life for any reason including the production of foie gras;

Principles a) and b) are zero-tolerance issues and shall be met in order to become or continue to be compliant with the Global Traceable Down Standard.

- c) Global Traceable Down Certification is valid on a product line basis. All entities in the selected supply chain shall meet or exceed the TDS standards to be considered certified. This certification does not necessarily apply to a supplier's entire supply chain and/or product range unless otherwise specified;
- d) All suppliers shall meet or exceed local regulations for animal welfare farming and processing of animals and animal products as well as best practices based on International Finance Corporation Good Practice Note on Animal Welfare in Livestock Operations shall be followed (see summary in Annex A). Where law is silent, best practices based on IFC shall apply;

- e) All levels of the down supply chain shall maintain records that prove chain of custody;
- f) All new down supply chains shall fulfill TDS audit requirements prior to incorporating the material within the Traceable Down product line;
- g) All approved traceable down suppliers are subject to announced and unannounced re-audits to verify sustainable remediation of identified corrective actions;
- h) In addition to the stated requirements, TDS chain of custody requirements shall be met by Textile Exchange Content Claims Standard in the applicable parts of the supply chain..;
- i) Suppliers shall demonstrate full transparency and commitment to continuous improvement in order to remain a compliant supplier to the Global Traceable Down Standard; and
- j) Suppliers shall show commitment to on-going training and education for employees within the down supply chain to support continuous improvement and sustainable compliance of the Global Traceable Down Standard.

1.5 Audit methodology

The following are key components to the audit methodology used when assessing down supply chain for traceability and animal welfare. The approach is one of collaboration and mutual respect towards suppliers at all levels with a focus on education and sustainable remediation. Documentation required to demonstrate compliance shall be made available for review during the audit or pre-audit process at all levels of the supply chain.

All farm visits shall be scheduled around the production cycle where live plucking or force feeding is most likely to occur or where animal welfare challenges are at their highest.

- For geese parent farms this is when the birds are out of egg production; for duck parent farms this is within two months of the flock being slaughtered and never prior to reaching peak production.
- For geese raising farms this is within 5-6 weeks of slaughter for the risk of live plucking and two weeks of slaughter for the risk of force-feeding; for duck raising farms this is within two weeks of slaughter.

1.5.1 Supply chain risk assessment methodology

The down supply chain is a global industry, characterized by a broad spectrum of businesses, countries, and products. Countries where waterfowl is raised may have more or less robust legal frameworks around animal welfare, which impacts the risk to forced feeding or live plucking. Moreover, geese farming generally represents a higher risk of forced feeding than for duck farming, due to the production of foie gras. Lastly, the practice of live plucking is generally more prevalent in certain countries, and not in others. Due to this spectrum of risks in the various supply chains, the Global Traceable Down Standard takes a risk based approach to the site sampling and auditing component.

To this end, the following criteria for assessing risks of forced feeding or live plucking in the down supply chains has been identified as follows:

- Robust national animal welfare standards;
- Enforcement of animal welfare standards;
- Waterfowl species in question;
- Known cases of live plucking/molt harvesting;
- Known cases of forced feeding;
- Size and formalization of the waterfowl industry;
- The location has demonstrated compliance, through:
 - 2nd party audits;
 - 3rd party audits; or
 - History of meeting requirements of the Traceable Down Standard.
- Years of operation by the entities in the supply chain;
- Timing in regards to the breeding cycle of the waterfowl; and
- Other criteria may also be presented to the certification body for consideration.

The above indicators of risk may be gathered through a variety of means, including stakeholder engagement with animal welfare groups, veterinarians, academic or industry experts, published research, media articles or open source reports.

For supply chains or individual entities that are determined to represent high risk, the site sampling will be more robust, whereas for those supply chains or entities that are determined to represent a standard risk, the sampling will allow for more strategic sampling.

The methodology and scoring for determining risk in a supply chain will be determined by the certification body.

1.5.2 Pre-audit preparation

All down supply chain sites shall be disclosed by the direct supplier or brand looking to have their products and/or entities certified to the TDS, to the certification body to enable third-party audits.

The certification body approved auditors will need to become familiar with local law and animal welfare conditions in the region in preparation for the Global Traceable Down audit.

1.5.3 Site visit sampling

All entities in a selected supply chain shall be audited as part of the certification process. Due to the range of supply chain specifications, in particular the number of parent and breeding farms in a given supply chain, a country risk based approach has been created for determining the entities that shall be visited. Further information on the methodology for determining risk is provided in section 1.5.1.

Table 2 - Industrial scale supply chain

Entities	Standard risk supply chain	High risk supply chain
Parent farms	75%	100%
Hatcheries	100%	100%
Raising farms	75%	100%
Slaughterhouses	100%	100%
Processor	100%	100%
Wholesaler	100%	100%
Finished goods factory	100%	100%

Table 3 - Household scale collector based supply chain

Entities	Standard risk supply chain	High risk supply chain
Household scale producer	For 0-100 households: 75% of towns where households are concentrated. 30% of households per town (minimum of 5 households) For 100+ households: 75% of towns where households are concentrated. 3 x the square root of households	For 0-100 households: 100% of towns where households are concentrated. 30% of households per town. (minimum of 5 households) For 100+ households: 100% of towns where households are concentrated. 3 x the square root of households
Collector	75%	100%
Processor	100%	100%
Wholesaler	100%	100%
Finished goods factory	100%	100%
NOTE — The household site visits for the collector based supply chains will be capped at 100 households.		

1.5.4 Notification

All entities shall undergo site audits on an unannounced basis, for initial audits there may be prior notification that is necessary. Due to biohazard or sanitary regulatory restriction regarding farm and processing facilities, a limited prior advanced notification may be necessary for some audits to take place. Unannounced audits will be conducted without any prior notification that the visit is occurring, and announced audits there will be a 48 hour timeframe between the notification and the conducting of the audit to ensure that biohazard or sanitary requirements have been met. At a minimum, the following guidance provides a framework for required notification practices according to the various supply chain actors:

Table 4

Entity	Maximum notification timeframe: Industrial farming
Parent farms	Unannounced or announced with a 48 hour window due to biohazard regulations require clearance for auditors
Hatcheries	Unannounced or announced with a 48 hour window due to biohazard regulations require clearance for auditors
Raising farms	Unannounced or announced with a 48 hour notification due to biohazard regulations require clearance for auditors
Slaughterhouses	Unannounced or announced with a 48 hour notification due to food safety regulations require clearance for auditors
Processor	Unannounced basis
Wholesaler	Unannounced basis
Finished goods factory	Unannounced basis

Table 5

Entity	Maximum notification timeframe: Collector
Household scale producer	Unannounced basis
Processor	Unannounced basis
Wholesaler	Unannounced basis
Finished goods factory	Unannounced basis

1.5.5 Visual inspection elements

On-site audits shall occur at parent farms, hatcheries, raising farms, slaughterhouses, down pre-processors and processors, down wholesalers, and finished goods manufacturers.

The scope of the on-site audit shall include, but is not limited to a walk-through of the facility and review of the following items related to the Certification Body Certification requirements:

- Visual inspection of the treatment of the birds (if applicable to the entity);
- Visual inspection of the birds environment (if applicable to the entity);
- Review of labeling practices and procedures;
- Review of segregation practices and procedures;
- Review of separation practices and procedures;
- Review of traceable supply chain process implementation;
- Worker interviews to proper implementation of traceability policies, procedures, documentation, training and animal welfare legal compliance;
- All other requirements as required by the Standard;
- Issues identified during the document review; and
- Complaint policies.

For specific requirements of each entity type, see section 4.1.1.

1.5.6 Document review

Auditors shall be allowed to review all relevant chain of custody documentation, animal welfare legal compliance documents, veterinarian reports, and other paperwork at each level in the supply chain that proves the implementation of animal welfare practices traceability management systems and employee training. For entity type requirements, see section 4.2.1.

1.5.7 Management and worker interviews

Auditors shall be allowed to conduct private management and worker interviews in the local language at all levels of the supply chain to assess proper implementation of traceability policies, procedures, documentation, training and animal welfare compliance.

1.5.8 Relationship with legislation

Traceable Down suppliers shall be in compliance with animal welfare, health and safety, environmental, and other relevant regulations that are applicable to operations or processing facilities claiming conformance.

1.5.9 International trade aspects

The procedure and requirements included within this Standard are designed to enhance trade while maintaining a level of awareness with respect to traceability and animal welfare issues.

1.6 Continuous improvement

This Standard will be revised as new traceability and animal welfare legislation and best practices emerge. After initial publication, the standards development committee will determine if revisions are needed, with a minimum requirement that the entire Standard will be open for revision every two years.

2 Normative references

The following documents contain provisions that, through reference, constitute provisions of this Standard. All documents are subject to revision, and parties are encouraged to investigate the possibility of applying the recent editions of the documents indicated below.

IFC Animal Welfare

Textile Exchange Content Claim Standard

3 Definitions

3.1 household scale producer farms (HSP): These entities are generally individual or family owned farms that raise up to 100 geese or ducks either for own consumption or sale. Down is typically sold to a collector who acts as an intermediary between them and the processor.

3.2 broker: Entity that acts as an intermediary between two tiers in the supply chain. For the purposes of this Standard, this term is used to refer to a buyer of down from slaughterhouses, who sells to a pre-processor.

3.3 collector or collector-based supply chain: Supply chains that are based on collectors who purchase down from Household scale producer farms that raise geese or ducks either for own consumption or for

sale. Collectors generally sell to agents, traders or processors.

3.4 down: The plumage forming the undercoating of waterfowl, consisting of tufts of light, fluffy filaments (e.g. barbs) growing from one quill point, but without any quill shaft¹

3.5 down processors: Purchases washed down from slaughterhouses and further washes, sterilizes, and sorts it to sell to down wholesalers.

3.6 down wholesalers: Purchases washed and sorted down, further washes, sterilizes, sorts it, and sells finished down to finished goods manufacturers.

3.7 hatchery: Facilities producing day old commercial birds.

3.8 farms: Parent farms, hatcheries and breeding farms that lay eggs, hatch eggs and raise animals until they are ready for slaughter, processing as meat products, down and feather, and other by-products.

3.9 feather material: The plumage or outgrowth forming the contour and external covering of fowl consisting of quills and barbs. Includes only material which has not been processed in any manner other than by washing, dusting, and sterilizing.

3.10 finished good: Item which contains down as a component, which is sold to consumers. Examples may include bedding, sleeping bags or apparel items.

3.11 finished good manufacturer: Purchases finished Global Traceable Down material, manufactures it into finished goods, and sells these products to the customer.

3.12 industrial based supply chain: A supply chain that is based on the industrial production of geese or ducks for meat. Down is obtained exclusively from slaughterhouses that have processed the animals on a large scale, and who sell the down as byproduct of this process.¹

3.13 parallel processing

3.13.1 parent farm, hatcheries and breeding farms: Traceable Down Standard birds and non-Traceable Down Standard birds are on the same holding at the same time and there is no physical separation and documented control system to provide sufficient evidence that the TDS COC requirements are met.

3.13.2 slaughterhouses: Birds are slaughtered concurrently on separate processing lines that do not have the physical, documentation and management control to provide sufficient evidence that the Traceable Down Standard chain of custody requirements are met.

3.14 parent farms: Goose/duck may live # of years, holdings where breeding stock are reared for the production of hatching eggs.

3.15 raising farm: holdings where birds are reared for meat. These could be from day old to slaughter.

3.16 slaughterhouses: Purchase live animals from farms and process them into meat products, raw feather and down, and other by-products. Washes and sterilizes raw feather and down and sells to down processors.

3.17 strategic sampling: See section 1.5.3 – Site visit sampling.

¹ "Down and Feather Definitions." International Down and Feather Bureau (IDFB). <http://www.idfl.com/info/articles/>

4 Supply chain applicability and requirements

4.1 Intended users of this Standard

This Standard is intended to apply to the goose and duck supply chains seeking to obtain certification that provides assurance to consumers and retailers of the high standards of animal welfare that were held throughout all of the entities that handled the geese, up to and including the parent farms.

Certification to the TDS is limited to the selected supply chain which has been audited. A down wholesaler who has multiple supply chains, with processors in various countries and regions, will only be able to claim that the selected and audited supply chain has received NSF certification. All other supply chains not audited will not be able to claim certification to the Standard.

For all entities in a selected supply chain that are audited and approved as meeting the NSF Standard, they will be able to claim meeting the NSF TDS Standard, according to the level of certification granted to the entire supply chain. Such entities may demonstrate this status with category-specific « Recognition of Conformance with the TDS Standards ».

Table 6 - Entities that are intended users of this standard include the following:

	Conformant (Collector)	Advanced (Industrial)
Industrial Parent farm	N/A	Yes
Hatchery	N/A	Yes
Industrial raising farm	N/A	Yes
Household scale producer	Yes	N/A
Collector	Yes	N/A
Slaughterhouse	N/A	Yes
Broker	N/A	Yes
Pre-processor	Yes	Yes
Processor	Yes	Yes
Finished good	Yes	Yes

4.1.1 Standard requirements by entity type

The following section details the standard requirements for each entity type (parent farm, hatchery, slaughterhouses, etc.). For each criteria section there are either Zero Tolerances (ZT) or Requirements (R) listed. For explanations of Zero Tolerance and Requirement implication, see *section 5.3*.

4.1.1.1 Parent farm criteria

Animal welfare	Criteria
Farms shall be audited and verified to the Traceable Down Standard.	ZT
Down and feather shall not be removed from live animals. Animals shall not have been live plucked or molt harvested at any stage in the supply chain.	ZT
Animals are not force fed for any reason including the production of foie gras.	ZT
The site must demonstrate that local animal welfare regulations are met or exceeded. In the absence of local regulations, as a bare minimum the relevant elements of the IFC Animal Welfare requirements shall be met. If there has been a problem identified by the local government inspectors, corrective action shall be demonstrated.	R
Full access to all sites, buildings and operations are permitted, and private interviews with workers are permitted.	ZT
Audits shall be conducted while birds are at the farms to assess their welfare and rule out any visible sign of live plucking/molt harvesting, force feeding, precarious living conditions or overall mistreatment.	R
A list of equipment used at the raising and parent farms shall be provided and observed to ensure there is no manual or industrial force feeding equipment.	R
Natural or artificial light (of an intensity of at least 20 lux) shall be available in all buildings for a minimum of eight hours daily, and there shall be a period of darkness sufficient to allow proper rest.	R
Traceability	
Traceability management systems, which includes: policies, procedures, accountability, training, implementation, communication, monitoring, and continuous improvement.	R
Chain of custody documentation showing the movement of eggs from farm to farm is maintained onsite and available for review by the traceability auditors. Textile Exchange (TE) Content Claim Standard (CCS) Transaction Certificates will be accepted.	R
Management and worker training and education in traceability at every level of the supply chain	R
Education and outreach	
Farmer shall ensure clear communication and education on Traceable Down Standards through all levels of the supply chain, and where applicable, shall also facilitate and manage the audit corrective action plan process throughout the supply chain, including its own sites	R
Farmer shall be committed to continuous improvement and implement all corrective action items found in the audit process in a mutually agreed upon timeframe.	R

4.1.1.2 Hatchery criteria

Animal welfare	Criteria
Farms shall be audited and verified to the Traceable Down Standard.	ZT
Down and feather shall not be removed from live animals. Animals shall not have been live plucked or molt harvested at any stage in the supply chain.	ZT
Animals are not force fed for any reason including the production of foie gras.	ZT
Goslings shall be seen during audits at this level. Overall living conditions, handling and transportation of goslings shall meet either local legislative requirements or in their absence the IFC Animal Welfare requirements.	R
The site must demonstrate that local animal welfare regulations are met or exceeded. In the absence of local regulations, as a bare minimum the relevant elements of the IFC Animal Welfare requirements shall be met. If there has been a problem identified by the local government inspectors, corrective action shall be demonstrated.	R
Full access to all sites, buildings and operations are permitted, and private interviews with workers are permitted.	ZT
During transport, animals shall be neither too loosely nor too tightly loaded so as to reduce the risk of excessive movement or overcrowding resulting in injury.	R
During transport, animals shall be protected from extremes of heat and cold and provided with adequate ventilation.	R
Day olds shall be held in subdued light unless operations require full light to be effective and to safe guard the well-being of operatives.	R
Traceability	
Traceability management systems, which includes: policies, procedures, accountability, training, implementation, communication, monitoring, and continuous improvement.	R
Chain of custody documentation showing the movement of eggs or birds from farm to farm is maintained onsite and available for review by the traceability auditors. The supplying parent farms must be available for all eggs and provided with all day old chick deliveries to farms operating under TDS. TE CCS Transaction Certificate will be accepted.	R
Management and worker training and education in traceability at every level of the supply chain.	R
Education and outreach	
Farmer shall ensure clear communication and education on Traceable Down standards through all levels of the supply chain, and where applicable, shall also facilitate and manage the audit corrective action plan process throughout the supply chain, including its own sites.	R
Farmer shall be committed to continuous improvement and implement all corrective action items found in the audit process in a mutually agreed upon timeframe.	R

4.1.1.3 Raising farm criteria

Animal welfare	Criteria
Farms shall be audited and verified to the Traceable Down Standard.	ZT
Down and feather shall not be removed from live animals. Animals shall not have been live plucked or molt harvested at any stage in the supply chain.	ZT
Animals are not force fed for any reason including the production of foie gras.	ZT
The site must demonstrate that local animal welfare regulations are met or exceeded. In the absence of local regulations, as a bare minimum the relevant elements of the IFC Animal Welfare requirements shall be met. If there has been a problem identified by the local government inspectors, corrective action shall be demonstrated.	R
Full access to all sites, buildings and operations are permitted, and private interviews with workers are permitted.	ZT
Audits shall be conducted while birds are at the farms to assess their welfare and rule out any visible sign of live plucking/molt harvesting, force feeding, precarious living conditions or overall mistreatment.	R
A list of equipment used at the raising and parent farms shall be provided and observed to ensure there is no manual or industrial force feeding equipment.	R
Natural or artificial light (of an intensity of at least 20lux) shall be available in all buildings for a minimum of eight hours daily, and there shall be a period of darkness sufficient to allow proper rest.	R
During transport, animals shall be neither too loosely nor too tightly loaded so as to reduce the risk of excessive movement or overcrowding resulting in injury.	R
During transport, animals shall be protected from extremes of heat and cold and provided with adequate ventilation as per parent farm.	R
Traceability	
Traceability management systems, which includes: policies, procedures, accountability, training, implementation, communication, monitoring, and continuous improvement.	R
Chain of custody documentation showing the movement of eggs or birds from farm to farm is maintained onsite and available for review by the traceability auditors, showing supplying hatchery and parent farm details for all birds received (whether day old or brooded) TE CCS Transaction Certificate will be accepted.	R
Management and worker training and education in traceability at every level of the supply chain	R
Education and outreach	
Farmer shall ensure clear communication and education on Traceable Down standards through all levels of the supply chain, and where applicable, shall also facilitate and manage the audit corrective action plan process throughout the supply chain, including its own sites	R
Farmer shall be committed to continuous improvement and implement all corrective action items found in the audit process in a mutually agreed upon timeframe.	R

4.1.1.4 Collector criteria

Animal welfare	Criteria
Farms shall be audited and verified to the Traceable Down Standard.	ZT
Full access to all sites, buildings and operations are permitted, and private interviews with workers are permitted.	ZT
Down and feather shall not be removed from live animals. Animals shall not have been live plucked or molt harvested at any stage in the supply chain.	ZT
Animals are not force fed for any reason including the production of foie gras.	ZT
Obtain reports from veterinarians on animal husbandry practices in the selected region, with a focus on the prevalence of live plucking/molt harvesting or forced feeding.	R
Traceability	
Traceability management systems, which includes: policies, procedures, accountability, training, implementation, communication, monitoring, and continuous improvement.	R
Collectors shall maintain complete logbooks of all supplies, including source town and region, supplier (industrial or Household scale producer), and quantity and down type.	R
Chain of custody documentation showing the delivery of down from farm to collector is maintained onsite and available for review by the traceability auditors. TE CCS Transaction Certificate will be accepted.	R
Management and worker training and education in traceability at every level of the supply chain	R
Education and outreach	
Collector shall ensure clear communication and education on Traceable Down standards through all levels of the supply chain, and where applicable, shall also facilitate and manage the audit corrective action plan process throughout the supply chain, including its own sites	R
Collector shall be committed to continuous improvement and implement all corrective action items found in the audit process in a mutually agreed upon timeframe.	R
Conduct efforts to formalize business practices, including maintaining commercial documents.	R

4.1.1.5 Slaughterhouse criteria

Animal welfare	Criteria
Farms shall be audited and verified to the Traceable Down Standard.	ZT
Full access to all buildings and operations are permitted, and private interviews with workers are allowed.	ZT
Audits shall be conducted while birds are being processed in order to rule out parallel processing, as well as any visible signs of live plucking/molt plucking.	R
Down and feather shall not be removed from live animals. Animals shall not have been live plucked or molt harvested at any stage in the supply chain.	ZT
No parallel processing of traceable geese and ducks with forced fed or live plucked/molt harvested animals.	ZT
Animals being processed have not been force fed for any reason, including the production of foie gras. At a minimum, slaughterhouses shall have fully mapped all farm sites that supply birds and maintain adequate documentation on site to prove they do not accept live plucked or force fed birds. As an added measure, slaughterhouses shall have, or shall work toward implementing, written contracts with all supplying farms. Contracts shall contain language that requires the farms to not live pluck or force feed the birds.	ZT
Documentation from local government authorities indicating that local animal welfare regulations are met or exceeded shall be provided. In the absence of local regulations, a bare minimum shall be met (IFC Animal Welfare).	R
During transport, animals shall be neither too loosely nor too tightly loaded so as to reduce the risk of excessive movement or overcrowding resulting in injury.	R
During transport, animals shall be protected from extremes of heat and cold and provided with adequate ventilation.	R
Prior to slaughter, proper handling techniques and lighting, space and ventilation shall be used to keep the animals calm.	R
Animals shall be slaughtered as soon as possible after arriving at the slaughter facility.	R
All animals shall be handled and restrained, rendered unconscious and slaughtered in the least distressing and most pain-free manner possible by trained and competent staff. All animals shall be rendered unconscious by a means which causes unconsciousness to persist until death occurs.	ZT
Traceability	
Traceability management systems, which includes: policies, procedures, accountability, training, implementation, communication, monitoring, and continuous improvement.	R
Chain of custody documentation showing the movement of birds from farm to slaughterhouse, and of feathers from slaughterhouse to processors including the details of the origin of the birds, i.e. hatcheries and parent farms., is maintained onsite and available for review by the traceability auditors. TE CCS Transaction Certificate will be accepted.	R
Management and worker training and education in traceability at every level of the supply chain	R
Education and outreach	
Slaughterhouse Management shall ensure clear communication and education on Traceable Down standards through all levels of the supply chain, and where applicable, shall also facilitate and manage the audit corrective action plan process throughout the supply chain, including its own sites	R
Slaughterhouse Management shall be committed to continuous improvement and implement all corrective action items found in the audit process in a mutually agreed upon timeframe.	R

4.1.1.6 Down processor criteria

Animal welfare	Criteria
Down processors shall be audited and verified to the Traceable Down Standard.	ZT
Full access to all buildings and operations are permitted, and private interviews with workers are permitted.	ZT
If the down processor purchases or sells material that is removed from live animals and/or from animals force fed for the production of foie gras (parallel processing), the Traceable Down material shall be segregated during all phases of processing, including arrival of raw material to the facility through to shipping to next location. The down processor shall visually show segregation through labeling and or other clear identification methods in the storage areas, on machinery and during facility down material entry and exiting processes. Relevant written policies and procedures, chain of custody documentation, and employee training shall also be maintained on site.	ZT
Traceability	
Down processor maintains contracts with all local and international processing facilities and slaughterhouses supplying raw and/or washed down. Contract shall contain language creating awareness that certain customers have requirements that animals are not live plucked, molt harvested or force fed, and that local regulations regarding animal welfare are met. Down processor provides the above documentation for verification during the audit.	R
Traceability management systems, which includes: policies, procedures, accountability, training, implementation, communication, monitoring, and continuous improvement.	R
Chain of custody documentation showing the movement of eggs or birds from farm to farm is maintained onsite and available for review by the traceability auditors. TE CCS Transaction Certificate will be accepted.	R
Management and worker training and education in traceability at every level of the supply chain	R
Education and outreach	
Down processor shall ensure clear communication and education on Traceable Down standards through all levels of the supply chain, and where applicable, shall also facilitate and manage the audit corrective action plan process throughout the supply chain, including its own sites	R
Processor shall be committed to continuous improvement and implement all corrective action items found in the audit process in a mutually agreed upon timeframe.	R
Conformant level certification	
Use of collector-based approach within the supply chain is permitted at this tier.	N/A
Advanced level certification	
Use of collector-based approach within the supply chain is not permitted at this tier.	N/A

4.1.1.7 Down wholesaler criteria

Animal welfare	Criteria
For all Global Traceable Down materials and products, down wholesaler shall only use input materials verified through the Global Traceable Down Standard.	ZT
Down wholesaler shall be audited and verified to the Traceable Down Standard.	ZT
Full access to all buildings and operations are permitted, and private interviews with workers are permitted.	ZT
If the down wholesaler purchases or sells material that is removed from live animals and/or from animals force fed for the production of foie gras, the Traceable Down material shall be segregated during all phases of processing, including arrival of raw material to the facility through shipping to next location. The down wholesaler shall visually show segregation through labeling and or other clear identification methods in the storage areas, on machinery and during facility entry and exiting processing. Relevant written policies and procedures, chain of custody documentation and employee training shall also be maintained on site.	ZT
Wholesaler shall allow random testing for evidence of live plucking based on the risk of their supply chain.	R
Traceability	
Down wholesaler maintains contracts with all local and international processing facilities and slaughterhouses supplying raw and/or washed down. Contract shall contain language creating awareness that certain customers have requirements that animals are not live plucked, molt harvested or force fed and that local regulations regarding animal welfare are met. Down wholesaler provide this documentation for verification during the audit.	R
Traceability management systems, which includes: policies, procedures, accountability, training, implementation, communication, monitoring, and continuous improvement.	R
Chain of custody documentation showing the movement of eggs or birds from farm to farm is maintained onsite and available for review by the traceability auditors. TE CCS Transaction Certificate will be accepted.	R
Management and worker training and education in traceability at every level of the supply chain	R
Education and outreach	
Down wholesaler shall ensure clear communication and education on Traceable Down standards through all levels of the supply chain, and where applicable, shall also facilitate and manage the audit corrective action plan process throughout the supply chain, including its own sites	R
Wholesaler shall be committed to continuous improvement and implement all corrective action items found in the audit process in a mutually agreed upon timeframe.	R

4.1.1.8 Finished good factory criteria

Animal welfare	Criteria
For all Traceable Down materials and products, factory shall only use input materials verified through the Traceable Down Standard.	ZT
Factory shall be audited and verified to the Global Traceable Down Standard.	ZT
Full access to all buildings and operations are permitted and private interviews of workers are permitted.	ZT
The production of finished goods using Traceable Down material shall be well labeled and segregated during all phases of production from down material entry through packing the finished goods for shipment.	R
Traceability	
Factory is pre-approved by the manufacturer and agrees to follow and implement the Global Traceable Down Standard throughout its supply chain.	R
Chain of custody documentation showing the movement of eggs or birds from farm to farm is maintained onsite and available for review by the traceability auditors. TE CCS Transaction Certificates will be accepted.	
The production of finished goods using Traceable Down material shall be well labeled and segregated during all phases of production from down material entry through packing the finished goods for shipment.	R
If raw down materials and/or finished goods down products are moved for storage into a location separate from the approved facility, NSF shall be notified before the move takes place. The new storage site shall be assessed and approved prior to placing the raw materials or finished products there.	R
Education and outreach	
Workers using Traceable Down during production shall be trained on traceability processes for finished goods manufacturers set forth by the Global Traceable Down Standard and on segregation methods to prevent mixing with non-traceable down.	R
Factory maintains up to date worker training attendance logs and conducts new-hire training and refresher trainings every 6 months or as needed.	R

5 Certification program requirements

The Traceable Down Standard requires compliance with the requirements of the Textile Exchange Content Claim Standard (Sections A, B, C and D).

All traceable down entering the supply chain shall have a transaction certificate issued by the Certification Body.

Certification to the TDS can be issued for the product and for the specific supply chain components. To ensure full compliance with the requirements of the TDS, there will be certificates presented to the sites and full disclosure of listing details available online. The Certification is valid for one year, there will be certain components that won't be audited on an annual basis. To ensure that a product or entity is Certified, confirmation on the online database will be the most accurate resource.

5.1 Identification of products for certification

A series of products may be grouped together (e.g., platform, bracket, family, product grouping) for the purposes of evaluation if the Company can adequately demonstrate to the Certification Body that the products are included in the same traceable down supply chain.

The Company (initiating brand or supplier) shall submit a complete list of the series of products included in the product grouping that will be evaluated by the Certification Body.

The Certification Body may authorize additional products for Certification under an existing product grouping if the Company documents to the satisfaction of the Certification Body that evaluation of other certified products verifies compliance with all the Certification Body requirements.

5.2 Certification process

The Certification process consists of the third-party audit steps needed to maintain the Company's Certification over a three (3) year Certification period.

- The initial Certification process consists of a document review and an on-site audit of the finished good manufacturing facility/facilities and of the traceable down supply chain for strategically sampled farms, slaughterhouses, down processors, and down wholesalers.
- After the initial Certification, two annual surveillance audits are required during the three (3) year Certification period. The surveillance audits will consist of a document review and an on-site audit of the finished good manufacturing facility/facilities and of the traceable down supply chain for strategically sampled farms, slaughterhouses, down processors, and down wholesalers.
- The recertification process consists of a document review and an on-site audit of the finished good manufacturing facility/facilities and of the traceable down supply chain for strategically sampled farms, slaughterhouses, down processors, and down wholesalers.

The Certification Body reserves the right to conduct additional audits to monitor for compliance with all the Certification Body requirements.

5.3 Implications of non-compliance

5.3.1 Zero tolerance

Any zero-tolerance non-compliance will be communicated by the auditing body to the NSF TDS Governance Committee and the initiating brand or supplier within 24 hours. The NSF TDS Governance Committee will review each case and will deny certification to the entire supply chain based on the results.

5.3.2 Requirements

Any non-compliance with requirements will result in a mandatory corrective action plan to be completed by the initiating brand or supplier within a period of 30 days and communicated to the certifying body. In certain circumstances, additional time for corrective action implementation may be granted. Failure of the initiating brand or supplier to commission a follow-up assessment within 90 days of the completion of the on-site assessment will result in the denial of certification to the entire supply chain.

5.4 Surveillance audit

The surveillance audits will consist of a document review and an on-site audit of the finished good manufacturing facility/facilities and of the traceable down supply chain for strategically sampled farms, slaughterhouses, down processors, and down wholesalers.

Hatcheries, slaughterhouses, preprocessors, processors and factories are sampled at 100% annually.

Table 7 - Farm sampling methodology

Year 1 (Initial Certification)	75% of raising farms and parent based on standard risk as defined in TDS.
Year 2	$\sqrt{\text{year 1 farms} + 1 + 100\% \text{ added/new farms.}}$
Year 3	$\sqrt{(\text{year 1+2 farms}) + 1 + 100\% \text{ added/new farms.}}$
Year 4 (Recertification Year)	$\sqrt{(\text{year 1-3 farms}) + 1 + 100\% \text{ added/new farms.}}$
Year 5	$\sqrt{(\text{year 1-4 farms}) + 1 + 100\% \text{ added/new farms.}}$
Year 6	$\sqrt{(\text{year 1-5 farms}) + 1 + 100\% \text{ added/new farms.}}$
Year 7 (Recertification Year)	$\sqrt{(\text{year 1-6 farms}) + 1 + 100\% \text{ added/new farms.}}$
NOTE — The $\sqrt{+1}$ methodology can be used for standard risk chains under each slaughterhouse. The raising farms and parent farms for each sub-chain will be evaluated separately.	

By the 2nd Recertification Audit (Year 7), each farm must have been audited at least twice. This may increase the yearly auditing requirements beyond that described in the sampling methodology.

Farms that are added to the chains after the initial certification (Year 1) must be audited during the next calendar year of certification. Added farms are not included in the $\sqrt{\quad}$ formula for auditing.

If there are any instances of force feeding or live plucking found during audits, the farm chain under a slaughterhouse will revert to the Year 1 (Initial Certification) sampling scheme. Once the chain is found in compliance, they can begin to follow the Year 2 and beyond sampling scheme.

Following the Year 7 Recertification, farms will continue to follow the sampling scheme starting with Year 2 – 7 and continue to repeat.

Documentation shall be submitted to the Certification Body within sixty (60) days of the Company's anniversary in preparation of an upcoming surveillance audit. If the Certification Body does not receive the required documentation within the sixty (60) day period, the Certification Body may withdraw the Company's Product Certification.

The Certification Body reserves the right to conduct additional audits to monitor compliance with all NSF requirements.

5.5 Recertification audit

The recertification audits will consist of a document review and an on-site audit of the finished good manufacturing facility/facilities and of the traceable down supply chain for strategically sampled farms, slaughterhouses, down processors, and down wholesalers. For details on sampling see *section 1.5.3 Site Visit Sampling*.

Documentation shall be submitted to the Certification Body within sixty (60) days of the Company's anniversary in preparation of an upcoming recertification audit. If N the Certification Body does not receive the required documentation within the sixty (60) day period, the Certification Body may withdraw the Company's Product Certification.

The Certification Body reserves the right to conduct additional audits to monitor compliance with all Certification Body requirements.

This page is intentionally left blank.

Annex A²
(informative)
Summary of best practice animal welfare standards

The following best practices in animal welfare were taken from the International Finance Corporation's Good Practice Note on Animal Welfare in Livestock Operations³. The Global Traceable Down Standard uses the IFC's standards as the basis for the evaluation of animal welfare. The higher standard more in favor of the animals is applied.

Feed and water
Animals should receive a daily diet adequate in composition, quantity and containing appropriate nutrients to maintain good health, meet their physiological requirements and avoid metabolic and nutritional disorders.
Animals should have an adequate daily supply of water that is palatable and not harmful to their health.
Food and water should be provided in such a way that all animals have an opportunity to feed or drink without undue competition and injury.
Housing systems
Animal accommodation should be designed, constructed and maintained to allow all animals space to stand, turn around, stretch, sit and/or lie down comfortably at the same time. They should also allow all animals to directly interact with herd or flock mates, unless isolated for veterinary reasons. All animals should have access to a clean and dry place.
Effluent and waste should not be allowed to build up where it leads to discomfort and compromised welfare.
Animals should be protected from extreme temperatures or abrupt temperature fluctuations, cold draughts and from predators, vermin and excessive noise.
Animals with access to, or living, outdoors should have access to shade and shelter and protection from predators.
Husbandry practices
Handling and restraining techniques should minimize distress and avoid injury.
Health & disease
Personnel responsible for the care and management of animals should have an appropriate level of knowledge of the normal health and behavior of the animals in their care so as to be able to recognize poor health and welfare.
Animals should be inspected regularly, at least daily, and more frequently during periods of significant risk to health and welfare.
Animals shall be maintained in good body condition and remedial action (veterinary attention, improved nutrition or husbandry) taken when in poor condition, or when there are signs of significant distress, ill-health, disease or injury.
Transport
Animals should be neither too loosely nor too tightly loaded so as to reduce the risk of excessive movement or overcrowding resulting in injury.
During transport, animals should be protected from extremes of heat and cold and provided with adequate ventilation.
Slaughter
Prior to slaughter, proper handling techniques and lighting, space and ventilation should be used to keep the animals calm.
Animals should be slaughtered as soon as possible after arriving at the slaughter facility. In cases where animals are kept for long periods prior to slaughter, feed and water shall be provided.
All animals shall be handled and restrained, rendered unconscious and slaughtered in the least distressing and most pain-free manner possible by trained and competent staff. All animals should be rendered unconscious by a means which causes unconsciousness to persist until death occurs.

² The information contained in this Standards page is not part of this American National Standard (ANS) and has not been processed in accordance with ANSI's requirements for an ANS. Therefore, this Standards page may contain material that has not been subjected to public review or a consensus process. In addition, it does not contain requirements necessary for conformance to the Standard.

³ The full document can be found at this link:

http://www.ifc.org/wps/wcm/connect/7ce6d2804885589a80bcd26a6515bb18/AnimalWelfare_GPN.pdf?MOD=AJPERES&CACHEID=7ce6d2804885589a80bcd26a6515bb18