

### Questions and Answers

### NSF Global Traceable Down Standard

Standard Overview

The NSF Global Traceable Down Standard (Global TDS) ensures that down in apparel, household, and commercial products comes from a responsible source that respects animal welfare and can be fully and transparently traced. Down is a byproduct of the food industry. In the down supply chain, most farms respect the welfare of the birds, but in some cases birds may still be force fed for foie gras production or even live plucked to get more than one harvest of down from a single bird. Global TDS certification audits inspect for and help ensure animal welfare throughout the supply chain. The Global TDS audits also verify that traceability systems are in place at all locations. Full traceability provides assurance that conventional down has not been mixed with certified down. Certification is provided to a product line with a fully audited and unbroken chain of custody from parent farm to final manufacturer.

Two types of supply chains provide down for processors: industrial supply chains and collector-based supply chains. Both types of chains are certified under this standard. Collector-based chains achieve Certified level and industrial supply chains can achieve Advanced level certification.

Q: Why does NSF Sustainability consider the Global Traceable Down Standard the best standard to reduce supply chain risk and provide full traceability?

A: There are 3 key reasons that make Global TDS best in class:

- Parent farm audits are required for certified down. Because parent birds live longest in the meat production process, they are the most likely to be live-plucked.
- Blending of traceable down is never allowed so when you buy a Global TDS certified product you can be sure that it is 100% traceable down.

• The Advanced and Certified levels provide the maximum degree of safeguards possible by farm type. Industrial farms can follow stricter audit guidelines than are possible for small farms in collector-based chains.

## Q: Has this standard been vetted by industry experts (slaughterhouses, collectors, etc.)?

A: Yes, down suppliers, traceability experts, animal welfare experts and other industry representatives have been consulted in drafting the standard and have reviewed and approved the different requirements. These experts continue to participate in the standard and its maintenance. Other industry participants are encouraged to get involved with the Global TDS by contacting NSF.

To maintain strict independence of services, these participants are fully separated from the certification process. They also do not have an influence in audit decisions or access to the audit reports.

## Q: What if down is sourced through both an industrial supply chain and a collector supply chain, how does this affect certification?

A: Each of the chains must be certified separately, with the industrial chain at Advanced level certification and the collector chain at the Certified level. If the two materials come together the material must be Certified level.

## Q: Can you explain a bit further about the differences between the Certified and Advanced levels?

A: Understanding the complexities of the down industry, NSF saw the need to have two different levels of certification. The Certified level is geared to those supply chains that obtain their down material from collectors. Birds are usually raised for food at household sites by families and traceability is one of the major challenges for this type of supply chain.







The Advanced certification level is geared to industrialized supply chains where birds are raised for commercialized food. In this supply chain, there are higher risks for animal welfare issues at the parent farms, hatcheries, raising farms and slaughter houses.

Having two levels of certification allows for transparency into each type of supply chain and assurance of animal welfare to brands sourcing down and consumers buying down products.

## Q: For the Certified level, do you audit the parent farms of the household level geese or ducks?

A: Families raising geese for their own consumption acquire their birds from different sources. Reaching the parents of birds raised in households that provide down to collectors is not currently a requirement. However, we will strive to gather information on the entire supply chain during the audit process, in order to ensure that our animal welfare standards are met. Parent farm auditing is required for the Advanced level of certification within the industrialized supply chain.

## Q: How is the household/collector based chain audited?

A: Assuming a chain has 1-100 households and the chain is a standard risk chain:

- 75% of the towns will be sampled and 30% of the households in each town will be audited (at least five households);
- 75% of the collectors will be audited and
- 100% of the processors, wholesalers and finished goods factories are always audited.

If there are greater than 100 households in a chain and/or it is identified as a high risk chain, there will be different requirements.

## Q: How is it determined if a chain is standard or high risk?

A: The Global TDS includes certain sampling requirements for the auditing of standard and high risk supply chains. The level of risk is correlated with the chances of the birds being live plucked or force fed. NSF determines the risk level through policies outlined in the Global TDS. The standard is included on the NSF web

# Q: My down supplier tells me that unannounced audits of farms and slaughterhouses in certain countries is not permitted legally. Will I not be able to obtain certification for my products in that case?

A: In the event that it is proven that unannounced audits are not permitted due to sanitary reasons, the auditing body will contact the entities 48 hours prior to the audit to let them know that there will be an upcoming audit. It is important for the company initiating this certification to provide information on the process to all of the entities. Moreover, in the first year of the program the farm level audits will be announced.

## Q: In the industrial supply chain, what requirements does the Global TDS place on hatchery production?

A: As long as there is physical separation and documented control systems are in place, there can be Global TDS and non-certified birds on the farm at the same time.

## Q: Will each entity that is audited be listed on the NSF web-site? How will a brand be able to confirm that their supply chain partners are all certified?

A: This will depend on the level of transparency agreed through the supply chain and who has commissioned the certification process. If the integrated slaughter and production company has sought certification so that they can sell their down as certified to any processor; then their details will be visible. If the down processor or retailer commissioned the certification, they may not want other competitors to benefit from their chain and so the details of the chain may not be visible. The specific details of what will be posted on the NSF website will be determined between the client and NSF.



#### Q: What's a typical timeline for NSF certification?

A: Once we have the mapping information for ducks, the process is relatively straight forward and the audits can be planned and completed over a 6 week cycle. Typically a further month is needed to complete the close out process is needed assuming all corrective actions are submitted and no follow up audits are needed.

For geese, due to the seasonal nature of their production cycle, there are more challenges to covering the whole chain and so the audit plan is likely to be spread over a longer period (potentially 4-6 months.)

This timeline is for the auditing of a supply chain. Auditing of manufacturing facilities would have a different timeline. Once the supply chain for a specific down product and the factories making that down product pass their audits, the product can be certified to Global TDS. It is important to realize that it may take some time to get all of the mapping information to complete the certification

#### Q: What is the cost of certification?

A: Fees for obtaining certification depend on the size of the supply chain, the location and the number of entities. The auditing firm will be able to provide quotes when they have a proper scope of the supply chain.

#### Q: What is certified?

A: The level of certification for products will depend on the supply chain type: Certified level for collector based, and Advanced level for industrial based. Entities (farms, hatcheries, collectors, slaughterhouses), will be listed as recognized entities in the supply chain. NSF will list on a website audited products that are certified as well as the entities in the supply chain for those products.

Q: I am a retailer who is interested in obtaining Global TDS certification for one line of products. Do I have to obtain total visibility into my supply chain first? A: While we recommend that this be your goal, for now, you may seek certification for a minimum of one line or product that contains 100% Global TDS down. You are not required to map all of your supply chains, if you are not going to seek certification for products that they supply.

## Q: Is there Global TDS certified down available that my company can purchase without having to certify a supply chain?

A: Yes, there is down available in the certified supply chains. You will want to check on Global TDS certified down availability with your manufacturers or down processors.

## Q: What do I have to do to sell a product as Global TDS certified?

A: Apart from following the standard, and going through the certification process (mapping, certification, corrective action plan, etc.), you must be able to offer at least one garment that contains 100% Global TDS down (at either the Certified or Advanced level of certification). You must also commit to education and outreach of the standard within your supply chain.

## Q: What are the requirements for finished goods manufacturers?

A: These requirements are in the areas of traceability, education and outreach, because at this stage there are no animals present. Education and outreach is mostly focused on training employees in the requirements on chain of custody. For traceability, only Global TDS certified material can be purchased. If a manufacturer has obtained Content Claim standard (CCS) certification, and can show compliance with that standard and requirements of this system, they will go a long way to being in compliance with the Global TDS. For more information, refer to the Finished Goods Factory criteria in the Global TDS.

## Q: Can I claim adherence to the standard if I purchase both Global TDS and conventional down?

A: Only the products that contain 100% Global TDS down can claim adherence to standard. Entities offering certified down and conventional down must be specific in claims for the material being sold. Entities can claim to supply certified down but not claim to be Global TDS certified. Mixing of certified down with conventional down is not allowed for any Global TDS certified product.

# Q: Are apparel or soft goods manufacturers working for more than one certified brand required to have separate Global TDS certification for each brand?

A: If you are a contractor manufacturing for several brands, you would not need a separate certification or audit. Details related to the NSF listing and contacts would have to be worked out as applicable.

# Q: I am certified to the Responsible Down Standard (RDS). Will I be able to claim that the RDS material I am selling meets the same standards as Global TDS?

A: Not at present, though we will continue to be open to the possibility of finding commonalities to other Standards that meet our minimum threshold. The Global TDS meets all of the same Textile Exchange Content Claim Standard requirements that the Responsible Down Standard does.

## Q: Can you explain what the Zero Tolerances mean versus requirements?

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

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. 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.

### Q: The criteria seem very strong in terms of animal welfare, are they achievable?

A: We believe so. The fact that there are two levels of certification, Certified and Advanced, allows for two supply chain models to obtain certification. While the criteria go deep into the down supply chain, we believe that with transparency, outreach and cooperation with

your supply chain partners, compliance with the standard is fully achievable. We have found in our initial auditing that adding parent farms in the industrialized system has a relatively small impact on the total number of farm-based audits. Many farms are supplied by the same parent farm.

## Q: I am interested in applying for the certification. Who should I contact, what do I need to do?

A: You can contact NSF Sustainability at +1.734.769.5192 or email us at sustainability@nsf.org

