



# FOUR PAWS – Brief overview

---

## Down traceability from an animal welfare perspective

### 1. The Developments and Achievements – through the FOUR PAWS animal welfare lense

Starting 2008, campaigns by animal welfare (including FOUR PAWS) and animal rights organisations (including PETA) have shown that animal suffering from the live-plucking or force-feeding of geese and ducks is present in the down supply chain and makes its way into the final products of brands using down. Brands did not want to have these practices in their products and were faced with two options, stopping the use of down or tracing and auditing their full supply chains to make sure cruelty is excluded from their down supply.

Over the past two years we have witnessed and worked together with encouraging industry initiatives that have shown key players in the down industry taking charge and responsibility for the animal welfare in their supply chains. Outdoor brands such as Fjällräven and Mountain Equipment were the first outdoor brands to develop in-house solutions for tracing their down and excluding animal cruelty from their supply.

In 2013, the outdoor brands Patagonia and the North Face have openly communicated that they are finalizing down traceability standards, the Traceable Down Standard and Responsible Down Standard. Both standards are now available for adoption by other interested brands. The European Outdoor Group (EOG) has placed this topic on their agenda, the US-based Outdoor Industry Association (OIA) was quick to follow suit. The associations have played a key role in sharing and discussing the new status quo and solutions with relevant stakeholders within the industry and facilitating related discussions. In 2014, the European Down and Feather Association updated their Downpass to adapt it to the higher traceability and animal welfare requirements discussed within the industry. The updated Downpass standard is expected to be released in summer 2015. In the latest industry discussions industry wide alignment on the need to exclude live-plucking and force-feeding from the down supply was observed. The hope is for the newly available industry solutions to spread into the mainstream and serve as the new industry wide benchmark.

FOUR PAWS has been actively and constructively engaging with key players within the industry over the past two years and has been part of the review committees of the TDS and RDS with the goal of ensuring that key safeguards are in place to help exclude cruel practices from the down supply chain. Providers of down products now have an opportunity to strongly position themselves as agents of change for better animal welfare practices.

### 2. Evaluation of main down industry standards

FOUR PAWS has developed a set of key as well as detailed criteria to assess industry standards, this set of criteria are additional to the need for basic animal welfare requirements, which are available in all three standards.

The set of key criteria are shown in the concise comparison table below. More detailed criteria will be made available at the onboarding meeting.



	TDS	RDS	Downpass <sup>1</sup>
General information	<p>This is by far the strictest standard in terms of safeguards</p> <p>Brands that want to have the highest guarantees that down is not from live-plucked or force-fed animals would use this standard</p> <p>Advanced level: for industrial farms, stricter requirements</p> <p>Conformant level: only for small farm groups, less strict requirements</p> <p>This division makes sense because it pushes for the maximum possible safeguards per farm type. In industrial farms it is possible to follow stricter audits than for small farm groups)</p>	<p>The RDS gives high assurances on many aspects</p> <p>The main weakness is in the fact that parent farms are in an optional module</p> <p>Overall standard for all farm structures (industrial and small farm groups)</p>	<p>The standard is structured according to modules</p> <p>Each module covers a separate component of the supply chain</p> <p>Brands that choose to use the Downpass standard have to take on all modules in order to cover the full supply chain covering the process starting with the parent farms to the final product</p> <p>Basic module covers the steps from the slaughterhouse to the final product</p> <p>Superior traceability options include modules that go back to the farms and hatcheries</p> <p>When brands don't choose all modules, they will not have a fully audited supply chain</p>
Are the inspections announced or unannounced	<p>Fully unannounced where possible, otherwise</p> <p>48 hours advance notice in case of bio safety requirements</p>	<p>50% announced</p> <p>50% either: semi-announced (72 hours notice), unannounced (2 months window, meaning they would tell the farmer they</p>	<p>A mix of announced and unannounced</p> <p>Unannounced audits will constitute of an additional 30% in major farms (additional to 100% announced inspections)</p>

<sup>1</sup> **The assessment of the Downpass standard is unofficial and preliminary.** Given the standard has not yet been published, the assessment made is based on information available online and questions we have raised in a meeting with the European Down and Feather Association earlier this year. **The assessment is thus not final and based on the latest information that was made available to us. It is possible that the final standard is different.**



	Small farm groups audited unannounced	are coming between June and July and then show up in a surprise visit) Additionally: 5% of all farms will be subject to confirmation visits, and 10% of high risk farms will be subject to the additional confirmation visits  Small farm groups will be audited unannounced	And between an additional 15-30% in small group farms depending on whether they are in regions where the risk of live-plucking or force-feeding is high or not
Frequency of audits	After first official audit, 2 audits will take place throughout the duration of three years Certification is given on annual basis	After first official audit, audits will take place annually Certification is given on annual basis <i>the fact that the audits are done annually makes this component stronger in the RDS than in the TDS, the weak point is the fact that only half the audits are unannounced</i>	100% of the farms are audited within a 2 year period
Parent farms are audited	Mandatory in advanced level (In conformant level, small farms also keep parent animals on the same farms)	Only in optional parent farm module We hope that parent farms are included as a mandatory requirement in the next version because parent animals are the most frequently plucked	In a separate optional additional module
Parallel production	Not allowed at the farm level or slaughterhouse level Allowed at washing facility but measures are taken to avoid mixing	Not allowed at the farm level Allowed at other levels but measures are taken to avoid mixing	Is allowed at all levels, measures are taken to avoid mixing
Labelling	Is done on the removable final product tags A text that explains the scope of the audit is listed there Only applies for 100% audited down	Provides logo on the final products Logo only applies for 100% audited down	One Downpass label on the removable tag of a product Labels are individually coded The label would include a summary of which modules are covered



### 3. FOUR PAWS demands

#### **FOUR PAWS topline demand is that brands using down**

- commit to excluding live-plucking and force-feeding from their supply chains
- commit to and implement full supply chain traceability
- ensure that key safeguards are addressed within their traceability efforts

#### **Key traceability safeguards**

- parent farms are audited - *parent farms are where the biggest risk of live-plucking is because parent animals live for 4-5 years and can be more frequently live-plucked for the "higher quality, high fill power down"*
- the highest possible percent of the audits at the farm level are unannounced - *to ensure that the animals are observed as they are kept on daily basis*
- parallel production is avoided at all possible levels, especially at the farm level - *having a production system with two parallel lines (one certified and one not certified) increases the risk of material that stems from potentially cruel practices to get into your final product, it could discredit the efforts made through the audit*  
*FOUR PAWS is especially concerned about parallel production lines at the farm level including for ethical reasons, in our work with producers we ask that the full supply chain is free of parallel production*
- all farms are audited within a certification period ideally within a year, additional corrective audits should be considered if the first audit shows animal welfare problems
- clear labelling is essential - *the label should clearly inform consumers what is covered or not covered in the audits made, not doing so presents a liability and discredits the standard that is being implemented*

#### **Why is FOUR PAWS demanding traceability**

FOUR PAWS works towards improving the welfare of farm animals, to ensure that they are spared of the most cruel production practices and that their keeping is as specie appropriate as possible.

The down supply chain is complex, and audits, when implemented in certain ways, can miss hidden cruelty.

FOUR PAWS argues that excluding cruelty is possible but only when sufficient safeguards are in place.

The list of criteria above serves as an essential set of safeguards.

Weak traceability not only increases the risk of cruelty but also discredits all credible and sincere efforts currently being undertaken

### 4. What FOUR PAWS can offer brands

FOUR PAWS can offer advisory support to brands that want to commit to tracing their down supply chain and develop their overall corporate animal welfare strategy.

FOUR PAWS is constantly assessing related developments and periodically publicly communicates about the level of effort made by different brands.