

Requirements for the testing and traceability of the flow of goods
Requirements for the chain of custody through audits carried out by Downpass e. V. (AG Mainz VR 40842)
Basic principles for product labelling with the registered trademark 'DOWNPASS'

DOWNPASS-Standard



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Aim and scope of application

The DOWNPASS-Standard (hereafter “Standard”) aims to globally advance the proper raising of geese and ducks kept for farming purposes. This includes the responsible sourcing of feathers and down as a by-product of the meat production industry. Their traceability must be comprehensively documented in order to ensure a transparent supply chain. In addition, an inspection of the composition of the filling material takes place. By advocating the proper and consumer-friendly labelling of these fillings, the Standard offers decision support to the market through the use of the DOWNPASS trademark. This Standard applies to all feather and down filling material used in bedding, clothing and outdoor products.

The Standard’s tools are on-site inspections throughout the supply chain, documentation reviews, plausibility checks and laboratory analyses.

This standard is applicable to

- licensees of the Traumpass e. V.
- products
- manufacturers that process down and feathers
- manufacturers that produce finished down- and feather-filled products
- companies that either subcontract the manufacturing of such products or sell them
- farms where waterfowl are bred and / or raised and slaughterhouses

Section 1

Definitions

- ***Feathers***

Horny integument of fowl plumage. Feathers consist of a quill and soft barbs.

- ***Down***

Plumage that forms the undercoating of waterfowl. Down consist of clusters of light, fluffy filaments growing from one weakly discernible down core. Down has neither quill nor vane.

- ***Raw feathers***

Feathers and/or down obtained from the animal after slaughtering that were not processed. The feathers and/or down may have been disinfected or treated merely for preservation.

- ***Pretreated feathers***

Feathers which have been rinsed, dried and / or sorted.

- ***Finished feathers***

Feathers which have passed through all the working processes, including washing, drying and all hygienic treatments.

- ***Feathers and down in this Standard***

Feathers and down are part of goose and duck plumage. The feathers and down specified in this Standard must not have been obtained from live animals. The feathers and down must comply with the aims and scopes of application of the Standard.

- ***Feather / down harvesting***

The process of removing feathers and down from dead animals. The removal of feathers and down may be carried out either manually or by machine. Removing feathers and down from live animals is not allowed under this Standard.

• **Parallel production**

The rearing of waterfowl at the same facility with and without obtaining of feathers and down from live animals. Keeping and rearing poultry on the same farm with and without foie gras production is also considered parallel production.

• **Breeding area / Waterfowl farms**

Any farms operated with a goal of raising waterfowl. They encompass:

1. Large farms (more than 500 animals)
2. Small farms
 - a) Small individual farms / small-scale poultry farming (less than 500 but more than 100 animals)
 - b) Rearing in farmer-managed, geographically defined communities of small farms consisting of a homogeneous group of small rearing farms (< 100 birds per group member). Poultry is reared there e.g. for regional or personal self-sufficiency, and not for commercial slaughter or export.

Small farms and groups of small farms that raise waterfowl are referred to in this Standard as "small farms". Such farms pass on their harvested feathers and down to organizations such as feather collectors or feather collecting centres.

• **Feather collecting centres / collecting companies with export licences**

Companies that collect, mix, wash, and / or resell feathers and down from slaughtered geese and ducks.

• **Bed feather factories / feather-processing companies**

Companies that procure and process feathers and down. (E. g. they mix, wash, dry and / or sort feathers and down. They may also manufacture semi-finished products, end material and / or ready-made products.)

- ***Bulk feathers and down***

(raw material / ready-made product / semi-finished product / end material)

Bulk down and feathers designated as raw material / ready-made product / semi-finished product / end material in this Standard have had their weight recorded, have been successfully audited and have been labelled with their composition.

- ***DOWNPASS filling***

Feathers and down which have been obtained neither from live animals nor from animals which have been kept for the production of foie gras, whose origin can be traced back to the rearing area, and which meet the requirements of this Standard.

- ***Transport containers***

All types of containers (for example feather bags) that are sealed and are used to transport feathers and down.

- ***Finished filled products / ready-for-use articles***

These terms refer to feather- and down-filled clothing, bedding, headwear, footwear and sleeping bags for indoor and outdoor use.

- ***Traceability***

Documentation that records the journey of feathers and down from a defined starting point to a defined end point or finished product.

- ***Chain of Custody – supply chain***

A system of documentation and monitoring for the entire journey of a defined quantity of feathers and down through the supply chain.

Chain of custody auditing begin with the raising and feeding of goose and / or duck chicks and includes animal transportation, slaughter and further processing steps / stages for handling or processing feathers and down, ending with the end material or finished filled product.

• **Starting point and topic of the traceability audit**

– **DOWNPASS**

Only feathers and down which do neither come from live animals nor from animals kept for the production of foie gras and whose origin can be traced back to the rearing area may be used. An exception is granted as regards eider down harvested in accordance with the valid legal regulations.

The feathers and down are removed after the animals have been slaughtered, e. g. at a slaughterhouse or farm. The starting point for auditing is:

1. the location of the rearing of the waterfowl.
2. Additionally, the authorized collecting company which has an operating license and / or export permit may in exceptional cases be the starting point of the audit. Exceptions can be applied if a sample audit is carried out among the small farms whose down and feathers are processed and / or resold through this collecting company.

• **Starting point and topic of the traceability audit**

– **Optional DOWNPASS additional module**

Expanding on the requirements of the DOWNPASS, an additional module can be included in the auditing and inspection process if the DOWNPASS user so wishes. The additional module must also be documented and successfully audited.

Preparatory auditing for DOWNPASS

Documentation and successful auditing of the supply chain of feathers and down fillings which have not been obtained from live animals.

• **DOWNPASS**

DOWNPASS (no force-feeding; retraceable back to the rearing area)

The documentation and successful auditing of the supply chain verifying that feathers and down were neither obtained from live animals nor obtained from animals being kept to produce foie gras, and whose origin is retraced back to the rearing area of the geese and / or duck chicks.

DOWNPASS additional module (parent farm)

Additional documentation and successful auditing of the supply chain for feather and down filling materials obtained from animals that can be traced back to the rearing of the parent animals.

- ***Quality assurance***

Quality assurance is completed through laboratory analysis to determine the quantitative composition of the filling material.

- ***DOWNPASS label***

DOWNPASS labels are numbered individually. They show the registered DOWNPASS trademark and serve to mark finished filled products.

- ***DOWNPASS labeling of finished filled products***

Labelling takes place through the DOWNPASS label, and may additionally be attached to the products via a hangtag, sticker, imprint, QR code or similar option.

- ***DOWNPASS marking of feathers and down as bulk material***

Marking feathers and down as bulk material may be carried out by means of a predetermined DOWNPASS sign which may be affixed to transport containers.

- ***DOWNPASS management system***

The DOWNPASS management system is based on ISO 9001:2015 and on the documentation of the supply chain. It is developed by the Traumpass e. V. and is recommended as the basis for supply chain documentation.

DOWNPASS Code of Conduct

A self-declaration by DOWNPASS users that they will comply with the Standard.

Section 2

Product labelling requirements (quality and traceability)

1. Basic principles

Users of the DOWNPASS trademark agree to accept and sign the current version of the DOWNPASS Code of Conduct.

The requirements for marking products with the “DOWNPASS” label are:

- a) meeting quality requirements;
- b) meeting traceability requirements through a successfully audited supply chain.

Labelled products are:

- a) feathers and down as semi-finished / finished products / end materials;
- b) feather- and down-filled bedding articles;
- c) feather- and down-filled clothing, headwear and footwear;
- d) sleeping bags for indoor and outdoor use.

2. Quality requirements

The labelled filling material must consist of feathers and down that meet the requirements of EN 12934 Class I or Class II (Europe).

Alternatively, they may comply with current labelling standards of feather and down filling materials as stipulated in any of the following:

- the Japanese labelling directive
- USA 2000 / ASTM 4522 (USA)
- KSK260 (Korea)
- GBT 14272-2011 Down Garments (China)
- QBT 1193-2012 Down and Feather Quilt (China)
- QBT 1195-2012 Down and Feather Sleeping Bag (China)
- QBT 1196-2012 Down and Feather Pillow (China)
- CNS 2119 1034 (Taiwan)
- Guide to the Labelling of Down and Feather 2000 (Canada)
- AS 2479-2007 (Australia)
- other approved and recognized labelling regulations

NOTE: If any of the above standards are replaced by other standards, the newest standard always applies.

In the case of semi-finished products and / or bulk materials, the evaluation of the quantitative composition is carried out after determining the down content (percentage of down) of a filling. The determination of the composition is carried out by determining the down content of a filling through manual separation of the down from the other parts of the filling. The filling composition is analysed, the down content is determined and compared to the information on the delivery note. The specified down content is the minimum percentage; exceeding this value is permissible.

3. Requirements for the traceability and the chain of custody auditing

a) Requirements for the preliminary audit for DOWNPASS

Feathers and down must not be obtained from live animals.

The basis for determining traceability is the inspection of involved production sites and their documentation. The additional suppliers and the various stages of the supply chain of the filling material are included in the audit.

The audit may begin at the slaughtering of the poultry and includes feather and down suppliers (bed feather factories amongst others). The supply chain for the feathers and down used must be documented and traced back at least to the starting point of feather and down harvesting from slaughtered animals. Documentation can include e. g.: certificates / invoices / delivery notes issued by nationally or internationally approved slaughterhouses, veterinarians or feather collecting companies that have an operating and / or export license.

b) DOWNPASS requirements

The basis for determining traceability is consist of Sections 2 and the requirements for documentation and successful auditing of the supply of feather and down fillings which were neither obtained from animals subjected to feather and down harvesting while alive nor obtained from animals that were used for the production of foie gras, and whose origin can be traced back to the rearing area of the goose and / or duck chicks.

- *DOWNPASS additional module (parent farm)*

The labelled filling meets the requirements of DOWNPASS and must additionally be traceable back to the rearing farm of the parent animals in the respective rearing area.

Inspections and documentation checks are required to audit the supply chain.

For the additional module, the audits begin with documentation reviews and inspections of parent stock farms. The inspections also include all subsequent stages of the hatchery, transportation, raising, slaughter of the animals and further processing of the feather and down filling material ending with the finished product / end material.

Section 3

Requirements for auditing / inspection

1. Basic principles

Auditing is carried out through inspections by neutral third parties (Section 6), accomplished through a combination of announced and unannounced inspection visits, company visits and documentation checks across all stages of the supply chain, in addition to quality testing. The scope of the audit is defined by the choice of additional module.

2. Documentation check requirements and inspection requirements

Documentation checks and inspections include an examination of purchasing, production and sales volumes as well as a review of documentation and compliance with the following principles (depending on the stage of the supply chain audited and additional module audited):

a) Bedding manufacturers and/or feather and down suppliers

- 1) Verification of operating licences / veterinary certificates
- 2) Filling material composition testing (verification of the filling material composition information provided by the upstream supplier – solely determining the total mass (weight) is not sufficient)
- 3) Definition of batch size and components (Determination of the total mass)
- 4) Inspection of the filling components to be audited:
 - Transport container labels and the associated documents
 - Transport container numbering and the associated documents
 - Verification of transport container numbering
- 5) Viewing and inspection of the business operating schedule (organisation and verification of the separation, washing, de-dusting, sorting, mixing and filling protocols for the goods in question)
- 6) Determination of processing losses according to in-house documentation
- 7) Inspection of stock and documentation on incoming and outgoing goods
- 8) Inspection of the filling material composition of the processed goods as well as the inspection of physical criteria
- 9) Inspection of the certificates of origin, delivery notes, customs declarations and test protocols for further traceability of the filling material (including inspection of delivery documents)
- 10) Inspection of the certificates of origin of the upstream supplier (slaughterhouse / collection business)
- 11) Inspection of previous audit reports

- 12) Review of deviations from 11) and the initiated correction measures
- 13) Examination of the audit reports of pre-suppliers (including with regard to the additional module)
- 14) Acceptance of the DOWNPASS Code of Conduct and related provisions

Inspection principles, e.g.:

- national requirements for operating licenses, veterinary regulations, official certificates for bed feather factories operating as disinfection facilities, any HACCP certificates and internal industry traceability procedures
- Company operations documentation (DOWNPASS management system)

For further regulations, please refer to the Implementation Rules

b) Slaughterhouses or collection companies with export licences

- 1) Determination of the type of slaughterhouse (e. g. classification in accordance with Regulation (EC) no. 853/2004 of 29 April 2004 in government registered slaughterhouses, including small slaughterhouses that predominantly sell foodstuffs directly to consumers, mobile slaughterhouses, and large slaughterhouses)
- 2) Verification of HACCP certificate or equivalent authorization to slaughter animals in accordance with the aforementioned criteria
- 3) Assessment of stunning and slaughter methods
- 4) Assessment of methods used to exclude the slaughter of animals raised to produce foie gras
- 5) Verification of operating personnel's technical knowledge through interviews.

- 6) Verification of the personnel training program including review of the documentation of training measures of the operating personnel (qualification certificates)
- 7) Site inspection to check technical equipment in order to ensure the proper slaughter of animals – during operating hours if possible
- 8) Inspection of operational schedule documents
- 9) Inspection of factory veterinarian protocols (determination of the number of animals delivered for slaughter, their sex, weight, breed and age, where the animals were raised, amount of animal by-products, inspection of silo emptying times, documents on transportation and the further use of animal main and by-products)
- 10) Inspection of documents in order to verify the supply chain, origin of animals and transport companies
- 11) Verification of adherence to animal protection regulations such as:
 - The slaughtering site must conform to national animal protection regulations and must be operated by qualified personnel.
 - The health of incoming animals is to be checked upon arrival before slaughtering. Sick and injured animals must be slaughtered immediately.
 - Swift and careful unloading of the animals must be ensured; it is not allowed to kick, throw or shove the animals.
 - The animals must be kept free of physical or emotional distress.
 - Cages, baskets or boxes in which the animals are transported must be handled with care; it is prohibited to throw them on the ground or to knock them over.
 - If animals are transported to the slaughter site in cages, baskets or boxes, they must be slaughtered immediately upon arrival.
 - Animals that are not slaughtered within two hours of arrival must be accommodated and handled appropriately.
 - Before slaughtering, the animals are to be anesthetized through a procedure guaranteeing that they will remain anesthetized and unconscious throughout the slaughtering process so they are spared preventable suffering.

- Slaughtered animals must be inspected for characteristics of forced feeding and characteristics of obtaining feathers from the living animal.
- For an audit, the exact age of the animal must be documented. Additionally, the equipment of the slaughtering facilities must be documented.
- All inspection documentation records must be kept for at least five years.
- The above mentioned detailed requirements for inspections are not valid for slaughtering at small poultry farms or in their enclosed slaughterhouses. The animals must be slaughtered professionally and without causing unnecessary pain. The animals must be kept free from physical or emotional stress

For basics of inspection, please refer to the Implementation Rules

c) Transport

Animal transportation

- 1) Inspection of trading licenses and company documents
- 2) Inspection of transport vehicles (their suitability to transport waterfowl)
- 3) Inspection of transport documents (animal origin and owner, place of dispatch, date and time of the start of transportation, planned destination, expected duration of the planned transportation, delivery notes, transport protocols, determination of the average duration of animal transportation, driving times, transport routes)
- 4) Verification of dispatch and destination data (from farm to slaughterhouse)
- 5) Inspection of loading and unloading protocols
- 6) Inspection and logging of mortality rates
- 7) Inspection and logging of injuries / unusual behaviour during animal loading and unloading as a result of transportation
- 8) Review of actual transportation times

9) Inspection and logging of transport vehicle cleaning

10) Inspection of animal protection regulations such as:

- Planning of transportation and routes must ensure that the destination of the animal transport is reached without detours and while complying with the maximum allowed transportation duration of 8 hours.
- Animals must be protected from adverse weather effects during the transport.
- Containers for the transportation of animals (i. e. cages) must be cleaned after every transport.
- Containers for the transportation of animals must not be overloaded; sufficient air circulation must be guaranteed.
- The animals must be handled by qualified personnel/staff.

Feather and down transportation

Inspection of the flow of goods: inspection of transport documents (origin of goods, place of dispatch, date and time of the start of transportation, planned destination, delivery notes, transport protocols)

Inspection principles, please refer to Implementation Rules

d) Poultry farms

Inspection of poultry farms through on-site audits to ensure adherence to the animal-specific criteria of the European convention on the breeding and raising of waterfowl such as domestic geese, domestic ducks and Muscovy ducks

- 1) Inspection of documentation on the number, age and sex of animals, combined with verification of the animals' origin – if necessary, back to the raising of the parent stock
- 2) Inspection of the fields, lairages, buildings and equipment including troughs, stalls, feedstuff, water supply, ventilation systems and litter.
- 3) Viewing and inspection of breeding and raising conditions
 - Sufficient drinking water must be available both day and night.
 - Animals must be provided with appropriate and sufficient amounts of feed during the day.
 - Animals must be provided with an appropriate environment with sufficient space to meet their social needs.
 - Animals must not be kept in cages.
 - Animals must be handled and cared for by qualified personnel/staff (certificates of training must be presented during the audit; they must date back at least two years and must have been renewed regularly.)
 - Appropriate shelter provisions must be provided to ensure that animals can retreat when necessary.
 - Barns must be large enough and must be kept clean and dry.
 - Animals must be provided with a sufficient number of suitable bedding coops.
 - Animals must also be protected from unnecessary suffering, injury and diseases.
 - Animals must be protected from cannibalism.
 - Animals must be protected from both domestic and wild animals.
 - Animals must not be subjected to any unnecessary stress.
- 4) Inspection of the flocks and of the business premises in order to rule out the production of by-products obtained through live plucking. The audited poultry farm must not harvest feathers and down from live animals, either on the audited premises or on any other farm operated and / or supervised by them. Animals are not to be given to other livestock owners for that purpose.

- 5) Inspection of the business premises in order to rule out the keeping of animals for foie gras production. The audited poultry farm must not produce foie gras, neither on the audited premises nor on any other farm operated and / or supervised by them. Animals are not to be given to other livestock owners for that purpose.
- 6) No parallel production (keeping of poultry for the harvesting of feathers and down from live animals or for the production of foie gras) must take place on the farm. The animals are not to be given to any other farm for this purpose.
- 7) Inspection of documents (any operating licences, verification of the number of animals purchased / sold / kept, inspection of the veterinary protocols [measures implemented to care for, develop and protect the health of the animals as well as mortality rates])
- 8) Documentation check and verification to ensure that the audited geese and ducks are only raised for poultry meat production and / or reproduction
- 9) Inspection of documents on the sale of animal by-products

To ensure adherence to the requirements listed above, audits must be carried out in accordance with the requirements of the corresponding additional module. For supplementary regulations, please refer to the Implementation Rules.

3. Instructions for performing audits of poultry rearing to rule out the harvesting of down and feathers from live animals

In order to obtain a random sample for the auditing of **poultry rearing**, a homogeneous set is formed by determining the geographical catchment area of the slaughterhouse. In addition, **the entire rearing area** with which the audited slaughterhouse cooperates is taken into account. It is necessary to determine whether the animals show characteristic features of feather harvesting from live animals.

When collecting random samples, it is necessary to distinguish between high-risk areas and low-risk areas.

Poultry farms in high-risk areas must be subjected to at least one announced audit every 2 years and additional unannounced audits at least once a year.

Farms in low-risk areas must be subjected to

- one announced and additional
- unannounced

audits at least every 2 years that involve the obtaining of random samples.

For further details, please refer to the Implementation Rules.

4. Instructions for performing audits of poultry breeding to rule out the possibility of using down and feathers harvested as by-product of foie gras production

In order to obtain a random sample for the auditing of **poultry rearing**, a homogeneous set is formed by determining the geographical catchment area of the slaughterhouse. In addition, **the entire rearing area** with which the audited slaughterhouse cooperates is taken into account. It is necessary to determine whether the animals show characteristic features of forced feeding.

When collecting random samples, it is necessary to distinguish between high-risk areas and low-risk areas.

Poultry farms in high-risk areas must be subjected to at least one announced audit every 2 years and additional unannounced audits at least once a year.

Farms in low-risk areas must be subjected to

- one announced and additional
- unannounced

audits at least every 2 years that involve the obtaining of random samples.

For further details, please refer to the Implementation Rules.

5. Auditing of collecting companies and small poultry farms

There are exception to the rules for auditing feather collecting companies and small farms.

The auditing of small waterfowl farms has the goal of inspecting animal breeding / raising conditions and ensuring that the animals have free access to fresh water and feed.

Additionally, the overall condition of the animals is to be evaluated and to determine whether characteristics of collecting feathers from live animals or force-feeding are visible.

The audit is performed by randomly checking animal breeding, raising and slaughtering conditions within geographically defined regions in which the companies are located to verify that the material from this region fulfills the respective requirements for the harvesting of down and feathers according to the additional module.

To inspect small farms and feather collecting companies, the auditor takes a random sample from the homogeneous set by determining the geographically defined catchment area of the collecting company / the small farms and the number of collecting companies / number of small farms.

Please refer to the Implementation Rules for details.

6. Evaluation of exclusion criteria, deviations and the implementation of corrective actions

The Standard differentiates between exclusion criteria, major deviations and minor deviations.

Exclusion criteria are:

- Harvesting of down and feathers from live animals (on the farm or commissioned by the farm in the rearing area)
- Parallel production on the farm level
- Force feeding of animals (on the farm or commissioned by the farm in the rearing area)

Exclusion criteria result in not awarding the DOWNPASS certificate to the audited company or in the immediate withdrawal of the right to use the trademark. Traumpass e. V. must be informed of this action.

Major deviations are deviations that result in the temporary refusal to issue a DOWNPASS certificate.

Examples of major deviations are:

- Fundamental evidence of the documentation of traceability is not available / is very incomplete.

Major deviations require a repeat audit by the auditor, who must only verify that the deviation has been corrected. The repeat audit must be performed within three months after the detection of the major deviation. If this time period is not complied with, Traumpass e.V. must be informed. This may result in the revocation of the right to use DOWNPASS.

Minor deviations are deviations which still allow the DOWNPASS certificate to be issued if small defects, discovered during the audit or quality checks, are corrected within a period of eight weeks.

A minor deviation can be:

- Missing proof for the documentation of the chain of custody that is of non-fundamental importance.

Minor deviations can be corrected by submitting the respective documentation. A repeat audit in the form of an on-site inspection by the auditor is not necessary. If the minor deviation is not corrected, the DOWNPASS certificate will be revoked.

Audits to re-check minor deviations may be performed as remote audits. Remote audits cannot be used for the inspection of animal rearing conditions. Remote audits can only be applied to the chain of custody for the processing of down and feathers.

Section 4

Responsibilities of the DOWNPASS user

1.

The user of the DOWNPASS label, hereafter referred to as 'user', is a member or licensee of Traumpass e. V. and must have met all their obligations towards Traumpass e. V. Violations will be punished in accordance with the applicable penalties schedule.

2.

The user must acknowledge, implement and confirm the DOWNPASS Code of Conduct of Traumpass e. V. in written form.

3.

The user must observe the valid Traumpass e. V. DOWNPASS-Standard, and have successfully passed the audits and quality inspections (as stipulated in the additional module if chosen).

4.

Every two years, the user must register for an audit by a testing institute approved by Traumpass e. V. The user will be provided with an identification number (ID no.) by a testing institute approved by Traumpass e. V. that will also be submitted to the lawyer / notary.

5.

The user must document compliance with the requirements of DOWNPASS and of the additional module if chosen and be able to provide valid audit reports.

6.

This documentation in the form of certificates / proofs must include all upstream stages as well as subsequent stages in order to ensure that the final products can be considered as traceable in accordance with this Standard. The scope of the documentation also involves the DOWNPASS additional module if applicable.

7.

The documentation must be checked and confirmed by an independent third party, such as a testing institute approved by Traumpass e. V.

8.

The user must train the responsible personnel working in their companies and acquaint them with the regulations of the Standard as well as implement regular training measures. The documentation of these measures must be kept for at least five years.

9.

The user may mark finished products with the DOWNPASS label. The labels are numbered individually and must be ordered through the lawyer / notary of Traumpass e. V. according to the conditions of Traumpass e. V.

10.

The user must keep a list of the volume of feathers and down contained in the finished products carrying the DOWNPASS label, with a description of the quality of the filling material in relation to the corresponding labelling regulation / standard, and submit this to the auditor.

11.

The user must submit operating schedules for the feather and down volumes marked with the DOWNPASS label. Said schedules must specify the produced quantities and the production losses resulting from the production processes (de-dusting, washing, drying). Furthermore, mixing protocols must be presented in order to document that only audited filling material is processed / marked as DOWNPASS filling.

12.

The user must separate DOWNPASS audited goods from non-audited goods during the entire production process and store them separately.

13.

The user must successfully pass the regular audits. The audit report must state that the audit has been passed ('Audit passed'). Audits must be carried out by an independent testing institute approved by Traumpass e. V. Both the user and the lawyer / notary appointed by

Traumpass e. V. receive the audit reports. Auditing costs are paid by the audit applicant. In cases of doubt, additional audits may be commissioned by Traumpass e. V.

14.

If the user uses terms and conditions, these terms must potentially be supplemented / amended in accordance with the requirements of the Traumpass e. V. DOWNPASS Code of Conduct, if necessary with additional declarations, to document there as well that products labelled with the DOWNPASS seal are monitored.

15.

The user is responsible for ensuring that audits are carried out every two years; otherwise, section 9 of this Standard enters into force.

Section 5

Responsibilities of Traumpass e. V. for the implementation of Sections 2, 3 and 4

The responsibilities of Traumpass e. V. for the implementation of Sections 2, 3 and 4 are as follows:

1.

Traumpass e. V. provides every user with currently valid documents, including those for the Standard. This can also be done via publication of the documents in the extranet.

2.

Traumpass e. V. requires a signed copy of the Code of Conduct from every user. Upon submission of this document, the user, the testing institute approved by Traumpass e. V., and the Traumpass e. V. lawyer / notary receive a confirmation of receipt. Additionally, this document will be requested by the Traumpass e. V. auditor during audits.

3.

Traumpass e. V. requires every user to confirm that an approved testing institute may view all documentation and carry out a site inspection at any time for the purposes of the audit.

4.

If the user has received the certificates / proofs stipulated in Section 4 from an independent third party, said documents must be forwarded to the lawyer / notary appointed by Traumpass e. V. The lawyer / notary shall confirm to the user that the required certificate (i.e. DOWNPASS certificate) has been received. In addition to the name and address of the user, the DOWNPASS certificate must indicate the start and expiration date of the certificate and the audited additional module. As long as the certificate remains valid, the user is entitled to order DOWNPASS labels according to the conditions defined by Traumpass e. V.

5.

Compliance with quality requirements can be monitored through the in-store purchase of finished products marked with DOWNPASS labels. Alternatively, samples may be taken from the business premises by a person authorized by Traumpass e. V. The specimens / samples are then examined by a testing laboratory authorized by Traumpass e. V. The tests are based on the requirements of the specific labelling and corresponding test specifications used. Quality requirements monitoring is carried out annually.

6.

The lawyer / notary appointed by Traumpass e. V. collects and monitors the reports of product tests and traceability audits for every user.

7.

Penalties for insufficient product quality and / or traceability are regulated by the DOWNPASS label penalties schedule and are imposed by the lawyer / notary appointed by Traumpass e. V.

8.

Traumpass e. V. provides relevant parties with suitable information material via the website or the extranet, such as a list of companies that have successfully passed both the audit and the quality inspection. Companies that have been disqualified from the right to use DOWNPASS are deleted from the list.

9.

Traumpass e. V. may authorize the use of the DOWNPASS label; labels are numbered individually and can be ordered through the lawyer / notary of Traumpass e. V.

Section 6

Requirements and responsibilities of auditing institutes

1.

Testing institutes approved by Traumpass e. V. ("auditor") are commissioned to carry out audits / inspection visits to verify the documented traceability of users of the DOWNPASS label. Auditing institutes must act as neutral, independent parties and must be qualified according to ISO 19011, ISO 17065 or comparable regulations.

2.

The testing institute approved by Traumpass e. V. carries out a review (inspection) of the user's company and, if necessary, their supplier(s).

3.

Initial inspections are generally announced at least 24 hours before the inspection date.

4.

Regular follow-up audits are also carried out with prior notice of at least 24 hours.

5.

The auditor is also required to carry out unannounced audits aimed at inspecting poultry rearing in commercial livestock production (see section 3, 3).

Unannounced audits: The auditor defines a timeframe of three months during which the audit will take place. No further announcements are made.

6.

The auditor is required to note all peculiarities observed during a repeat audit. If, during unannounced or repeat audits, violations and / or major deviations from the results of previous passed audits are detected, these defects must be corrected immediately. Otherwise, already awarded certificates will be revoked.

7.

As soon as the harvesting of down and feathers from live animals and / or the production of foie gras is detected, the granting of a certificate should be refused. Traumpass e. V. and all affected companies in the supply chain are to be informed.

In performing the inspection, the requirements of ISO 19011, ISO 17065 are to be observed, as well as the regulations of this Standard and the Implementation Rules.

8.

The auditor is required to treat all company information as strictly confidential. The auditor must submit a written confidentiality agreement to the company.

Section 7

Audit report

The audit report must be issued in duplicate by a testing institute approved by Traumpass e. V. The user and the lawyer / notary assigned by Traumpass e. V. each receive a copy. The audit report must contain the following information:

1.

All details recorded within the framework of the audit

2.

Place, date, and duration of the audit

3.

A list of all persons involved in the audit (first and surnames with contact details), along with their role / position in the company

4.

Photographic documentation of transport containers or finished products marked with the DOWNPASS label

5.

Peculiarities of the audit including e.g. description of the supply chain, the additional module if chosen, reports detailing deviations from the Standard and the corrections undertaken.

6.

Auditor assessment (audit passed / improvement required / not passed)

Section 8

Audit Report Validity

The audit report is valid for 24 months. The date of the audit report is decisive for determining the period of validity. The audit must be repeated every two years.

Section 9

Audit Validity Expiry

If audits are not repeated before the expiry of the current valid report, the user loses their right to use the DOWNPASS label without the need for explicit notification by Traupass e. V.

Traceability audits for the flow of goods / supply chain must be completed at least four weeks before the deadline of the 30th of September of the given year, so that a valid DOWNPASS certificate can be issued for the current year. The required inspection / audit reports must be completed and available before that date.

Section 10

Recognition

Members of Traupass e. V. or licensees who already have valid certification from the starting point of the module through Traupass e. V. or possess Traupass e. V. certificates are exempt from the preparatory DOWNPASS audit.

To complete the chain of custody audit, audits can be completed for those elements of the supply chain which have yet to be included in the audit / certification.

Additionally, audit reports of comparable traceability systems of down and feathers may be recognized by the Executive Board of Traupass e. V. in cooperation with the auditor.

Section 11

Audit costs

The costs of an audit are set in accordance with the current fee schedule of the testing institute approved by Traumpass e. V., and must be paid by the auditee to the testing institute.

Mainz, 12th of April 2018