

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'

Implementation Rules

DOWNPASS-Standard



Traumpass e.V. · Thomas-Mann-Straße 9 · 55122 Mainz

Implementation rules for DOWNPASS Standard

Introduction:

The DOWNPASS Standard regulates the requirements and procedures for tracing the supply chain, the rights and duties of the parties involved in the process and how the results are represented on the external product label. The scope of the Rules of Implementation are limited to the level of business partners in the B2B business as well as to the internal relationship among the business partners in the supply chain through the production of the finished product.

Furthermore, the DOWNPASS Standard, supplemented by the rules of implementation, is the means of regulating and verifying the available methods through which material that has entered the supply chain can be inspected, further processed and then sold, as well as under what conditions the geese and ducks have been held.

The DOWNPASS Standard and the implementation rules are applicable in addition to current legal practices; they do not replace them.

If questions arise in reference to the Implementation Rules, these must be resolved by a recognized auditor following consultation with Traumpass e.V.

Should clarification of any of the Implementation Rules be needed, contact Traumpass e.V.

Traumpass e.V. is incorporated under German law. The office is located at 55122 Mainz, Thomas-Mann-Str. 9. Traumpass e.V. is registered by the Register of Association VR3098.

To aid in the successful realization of the DOWNPASS Standard, these Implementation Rules are provided as a supplement.

1. Requirements of process losses and plausibility check

The validity of the determination of process losses and plausibility checks (section 3, point 6 Auditing / Inspection).¹

Accordingly, the acceptable upper limits (maximum permissible mass loss) are:

Raw materials: 50%

Semi-finished products: 20%

Finished feathers and down: 5%

¹ The paragraphs mentioned in this document refer to the DOWNPASS Standard (version of 09/05/17).

2. Documentation check and inspection requirements

As the basis for the inspection according to section 3 a (**bedding factories and/or suppliers of feathers and down**) the following regulations may be consulted:

- National requirements for operating licences, veterinary regulations, official bedding factories certified as disinfection facilities, HACCP certificates where applicable, traceability within the industry.
- Operating schedule documentation (DOWNPASS management system).
- European Commission Regulation #142/2011 of 25 February 2011 implementing European Commission Regulation #1069/2009 of the European Parliament and the European Council that determines hygiene regulations regulating animal by-products and derived products not intended for human consumption and implementing European Council Directive 97/78/EC regarding certain samples and items exempt from veterinary checks at border crossings, in particular L54/4 Paragraphs 21, 22, 23, 24 (TRACES System), L54/7, Paragraph 41 (Supply chain controls, verification of compliance with feed and food law as well as animal health and welfare regulations), Article 3f (Feathers and down), Article 8 (Requirements for processing plants (d)); Chapter V (Collection, transport, identification and traceability); Chapter VI, especially Article 20 (Registration and approval of manufacturing plants); Chapter VIII, especially Article 25.1 b (Import, transit and export of animal by-products and derived products); Chapter IX, Article 32 (Official controls); Appendix VIII (Collection, transport and traceability: vehicles and containers; temperature conditions); Appendix VIII, Chapter VII (Specific requirements for wool, hair, pig bristles, feathers, parts of feathers, and down), C. End point for feathers and down.
- European Commission Regulation #1069/2009 of the European Parliament and of the European Council of 21 October 2009 establishing hygiene regulations regarding animal by-products and derived products not intended for human consumption (particularly Article 3, Definitions; Article 4, Starting point of the manufacturing chain and obligations; Article 5, End point of the manufacturing chain; Article 10, Categorization of feathers and down; Article 21, Collection, transport and traceability; Article 22, Traceability; Article 23, Registration and authorization of businesses, plants, and factories; Articles 28 and 45, Official controls; Article 53, Sanctions).

3. Requirements for slaughterhouses or collection agencies possessing an export license

As the basis of the review to section 3 b (Slaughterhouses or collection agencies possessing an export license), the following regulations may be consulted:

- Registration of the type of slaughterhouse (Classification according to European Council Regulation No. 853/2004 for officially registered slaughterhouses, e.g. small slaughterhouses mainly selling food stuffs to consumers via direct sales / mobile slaughterhouses / large slaughterhouses) Chapter I, Article 1; Chapter II, Articles 4 and 6 (Registration and approval of businesses); Appendix II, Section II (Objectives of HACCP-based procedures); Section III (Information on the food chain including certificates of animal origin and animal health); Appendix III, Section II (Meat from poultry and lagomorphs); Chapter I (Transport of live animals to the slaughterhouse); Chapter II (Requirements for slaughterhouses); Chapter VI (On-site slaughter).
- European Convention for the Protection of Animals for Slaughter, Strasbourg, 10 May 1979, esp. Chapter I, Chapter II, Chapter III.
- The German Animal Welfare Act (TierSchIV) of 3 March 1997 (esp. requirements regarding Section 2, item 6 (Required equipment), item 7 (Requirements for caring for animals at the slaughterhouse); Section 4 (Provisions regarding the sedation, immobilization and slaughter of animals). [This Act is only available in German].
- European Council regulation no. 1099/2009 of 24 September 2009 on the protection of animals at the time of slaughter (applies to the EEA) – (Regulations for the stunning and slaughter of animals), esp. Chapter I, Article 1 (Subject matter, scope and definitions); Chapter II, Article 3 (General requirements for slaughter and related activities); Article 4 (Stunning procedures), Article 5 (Controls on stunning), Article 7 (Expertise and certification); Chapter III, Article 14 (Additional regulations for slaughterhouses), Article 17 (Animal welfare officer); Chapter V, Article 20 (Scientific support); Chapter VI (Non-compliance, sanctions and implementing powers).
- National regulations for the transport of live animals.
- European Convention for the Protection of Animals during International Transport, Paris, 13 December 1968, esp. Chapter I, Article 2; Chapter II, Articles 6 and 7 (Requirements for transport containers and cargo space); Article 13 and Articles 16-37 (Requirements for transport by rail, road, water and air).
- European Council Regulation no. 1/2005 of 22 December 2004 on the protection of animals during transport including related operations and the amendments to Directives 64/432/EWG and 93/119/EG and Regulation no. 1255/97.
- European Convention for the Protection of Animals kept for Farming Purposes of 22 June 1999, recommendation concerning domestic ducks (ANAS PLATYRHYNCHOS), especially Article 24ff, as well as the provisions in the Appendix.
- European Convention for the Protection of Animals kept for Farming Purposes of 22 June 1999, Recommendation concerning Muscovy ducks (CAIRINA MOSCHATA) and hybrids of Muscovy and domestic ducks (ANAS PLATYRHYNCHOS) and their crossbreeds, especially Article 23.
- European Convention for the Protection of Animals kept for Farming Purposes of 22 June 1999, recommendations concerning domestic geese (ANSER ANSER F.

DOMESTICUS, ANSER CYGNOIDES F. DOMESTICUS) and their crossbreeds, especially Article 24.

- Supplements to the aforementioned provisions as stipulated by national regulations.
- European Council regulation no. 98/58/EC of the European Parliament and the European Council of 20 July 1998 for the protection of animals kept for farming purposes.
- National legislation.
- National legislation concerning the slaughter of animals.
- Operating schedule documentation
- Regulation (EC) no. 1069/2009 of the European Parliament and of the European Council of 21 October 2009 stipulating hygiene rules concerning animal by-products not intended for human consumption and repealing Regulation (EC) no. 1774/2002 (Regulation on Animal By-Products) esp. Article 3, Article 10, Article 14 (J), Articles 23 and 24, Article 34.
- European Union Commission Regulation no. 142/2011 of 25 February 2011 implementing Regulation (EC) no. 1069/2009 of the European Parliament and Council stipulating hygiene rules for animal by-products not intended for human consumption, as well as the implementation of European Council Directive 97/78/EC with regard to samples and goods that are exempt from border veterinary checks in accordance with said Directive (especially Chapters V, VI, VII, VIII; Appendix IV: Section 4; Appendix XIII: Chapter VII).

4. Requirements for the auditing and inspection of animal transportation companies.

As the basis of the review of section 3 c (Transport of animals) the applicable legal framework is to be used:

- European Convention for the Protection of Animals during International Transport, Paris, 13 December 1968, especially Chapter I, Article 2; Chapter II, Articles 6 and 7 (Requirements for transport containers and cargo space); Article 13, Articles 16-37 (Requirements for rail, road, sea and air transport).
- European Council Regulation (EC) no. 1/2005 of 22 December 2004 on the protection of animals during transport and related operations as well as changes in Directives 64/432/EEC and 93/119/EC and Regulation (EC) no. 1255/97 (in particular Appendix I, chapter I: Technical regulations for the ability of the animals to be transported, on the means of transport (rail, road, water, air) and regarding transport practices, i.e. contact with the animals (Chapters I – IV), frequency of feeding and watering as well as transport duration (less than 12 hours for geese and ducks) and mandated rest times (Chapter V).
- National regulations on the transportation of live animals.
- Operating schedule documentation

As the basis of the review to section 3 c (Transport of feathers and down), the following provisions may be used (in accordance with any additional modules):

- European Union Regulation no. 142/2011 of 25 February 2011 implementing regulation (EC) no. 1069/2009 of the European Parliament and Council stipulating hygiene rules for animal by-products not intended for human consumption, as well as implementing the European Council Directive 97/78/EC concerning samples and goods that are exempt from border veterinary checks in accordance with said directive.

5. Requirements for the auditing and inspection of poultry farms.

As the basis of the review to section 3 d (Poultry Farms) the applicable legal framework is to be used:

- European Convention for the Protection of Animals kept for Farming Purposes of 22 June 1999.
- European Convention for the Protection of Animals kept for Farming Purposes of 22 June 1999, Recommendation concerning domestic ducks (ANAS PLATYRHYNCHOS).

- European Convention for the Protection of Animals kept for Farming Purposes of 22 June 1999, recommendation concerning Muscovy ducks (*CAIRINA MOSCHATA*) and hybrids of Muscovy and domestic ducks (*ANAS PLATYRHYNCHOS*), with the exception of Article 24, where applicable.
- European Convention for the Protection of Animals kept for Farming Purposes of 22 June 1999, Recommendation concerning domestic geese (*ANSER ANSER F. DOMESTICUS*, *ANSER CYGNOIDES F. DOMESTICUS*) and their crossbreeds excluding live harvesting of feathers and down and Article 25, The auditing of collection agencies.
- National regulations.
- Operating schedule documentation.

6. Requirements for auditing and inspection with the goal of excluding the live harvesting of feathers and down.

As the basis of section 3 d regarding the auditing of water fowl in parent farms as well as at other farms, with the goal of excluding the live harvesting of feathers and down as well as at other farms, the following protocol should be used:

Farms in the respective breeding area should be subjected to at least one announced audit every 2 years and at least one unannounced audit per year, taking country-specific laws into account.

To determine a sample for auditing farms, a homogeneous population is defined as the entire catchment area of the slaughterhouse. The composition of the sample is determined by the auditor.

The criteria are:

- **High-risk area**

Risk of collecting feathers from live animals (base risk >10%²):

The sample is calculated using the formula:

Sample = 100% of the number of farms in the high-risk area.

- **Low-risk area**

Risk of collecting feathers from live animals is unknown (base risk <10%²):

The sample is calculated using the formula:

Sample = 2 x the square root of the number of farms that make up the population, but at least 10%.

To determine the sample, the following criteria are used: regional customs, results of previous audits, information from third parties, national legislation, mass of down and feathers sold, slaughter age of the animals, waterfowl species, protocols for the targeted examination of animals with the aim of finding traces of collecting feathers from live animals.

² DIN ISO 2859-1:2014-08, 3.1.27 - NOTE Consumer's risk is usually 10%

7. Requirements for audit / inspection with the aim of excluding by-products from the production of foie gras.

As the basis of the review to section 3 b (audit / inspection with the aim of excluding by-products from the production of foie gras), the following protocol should be used:

Farms in the respective breeding area should be subjected to at least one announced audit every 2 years and at least one unannounced audit per year.

To determine a sample for auditing farms, a homogeneous population is defined as the entire catchment area of the slaughterhouse.

The criteria are:

- **High-risk area**

Risk of collecting feathers from force-fed animals is present (basic risk is $>10\%^2$):

The sample is calculated using the formula:

Sample = 100% of the number of farms.

- **Low-risk area**

The risk of collecting feathers from force-fed animals is unknown (basic risk is $<10\%^2$).

The sample is calculated using the formula:

Sample = 2 x the square root of the number of farms that make up the population, but at least 10%.

To determine the sample, the following criteria are used: regional customs, results of previous audits, information from third parties, national legislation, mass of down and feathers sold, slaughter age of the animals, waterfowl species, protocols for the targeted examination of animals with the aim of recognising the signs of foie-gras production.

8. Requirements for audit / inspection of collection agencies and smallholder livestock farming (including in groups)

There are valid exceptions regarding the auditing of collective farms and smallholder livestock rearing operations (section 3 d), Point 5, DOWNPASS Standard.

For the auditing of collective farms and smallholder livestock rearing operations there are valid exceptions.

The goal of auditing smallholder fowl farms is to inspect and confirm that the animals have free access to fresh drinking water and feed. The overall condition of the animals is also to be checked to determine whether the animals show signs of feather recovery from live harvesting or signs of force-feeding.

² DIN ISO 2859-1:2014-08, 3.1.27 - NOTE Consumer's risk is usually 10%

The audit is performed by taking random samples to review how the animals are kept and slaughtered in the geographically defined regions in which the companies are active in order to verify that the products from this region fulfill the requirements for the harvesting of down and feathers.

Regarding small agricultural farms and feather collecting plants, the auditor obtains a random sample from the homogeneous population by determining the geographically defined catchment area of the collecting plant / the small agricultural farm as well as the number of collecting plants / small agricultural farms.

Based on the above guidelines, the sample is determined and evaluated according to the following criteria:

- Regional customs regarding the extraction of feathers from living animals and force-feeding for foie gras in the defined catchment area.
- Approximate amount of feathers and down occurring in this region to be verified by the auditing company.
- Climate conditions in the region and their impact on smallholder livestock rearing are to be verified by the auditing company.
-

The sample is calculated using the formula:

Sample = three times the square root of the number of farms that make up the population.

As part of auditing collecting plants, the auditor carries out a document inspection after establishing the sample from the plants to be audited. The geographical catchment area will be determined, the samples for the auditing of the smallholder poultry farms will be calculated, and the audit carried out according to the above requirements.

9. Requirements and responsibilities of auditing institutes.

The requirements for the qualifications of auditors (ISO 19011) and the auditing institute (ISO 17065), including the normative instructions as detailed in section 6 of the DOWNPASS Standard, apply to the carrying out of inspections.

To carry out the inspections, the following documentation and tests are used:

- 1) The inspection of factories and businesses in the supply chain will be carried out according to section 2 of this standard as it applies to the respective modules.
- 2) Data collection / Examination of documents.
- 3) Recording of company data (name and address of the manufacturer).
- 4) Recording of the name and address of the applicant (if different from the manufacturer).
- 5) Assignment and recording of the firm's ID number (see section 4, item 4) by a testing institute recognized by Traumpass e. V.
- 6) Assignment of an audit number by the testing institute.
- 7) Specification of the type of audit / inspection to be performed (i.e. initial, monitoring or renewal inspection).
- 8) Recording of the date and site of the inspection.

- 9) The spot-checking of label numbers (for example, through photo-documentation).
- 10) On-the-spot examination of the comprehensiveness of the operational documentation, especially against the following criteria:
 - a. Presentation of a current audit report (if available).
 - b. Inspection of discrepancies identified in previous audits and any corrective measures taken.
 - c. Presentation of a current signed DOWNPASS Code from Traumpass e.V.
 - d. Presentation of certificates detailing the traceability of the supply chain back to the starting point – review of the supply chain in accordance with section 2 of this Standard.
 - e. Assessment of deviations (both major and minor) and the development of a timetable for introducing corrective measures.

Mainz, May 9th 2017