

# Responsible Feather and Down Sourcing Policy

*The scope of this policy is to cover all Marks & Spencer Feather and Down use in Clothing and Home – including blends*

## **Summary**

This policy sets out M&S's minimum animal welfare standards for Feather and Down and what should be done to ensure that all feather and down comes from more sustainable sources.

## **Introduction**

Assuring fibre quality through every part of the production process is a vital priority for M&S and, more importantly, for our customers. Couple this with the demand for traceability of production and the increasing consumer awareness of animal welfare issues the requirement for meaningful standards of practice is self-evident.

## **M&S's Minimum Standards for Feather and Down**

- No animal will be slaughtered specifically to produce M&S products. Only by-products of the meat industry must be used.
- No non-food products will be derived from endangered species, defined as those which appear on CITES or the IUCN red list
- Feather and Down – must not be obtained from the live plucking of birds or from birds used in the production of Foie Gras – see appendix A
- The Bird species and breed must be identified by the supplier and declared on the product specification
- No Force Feeding – see Appendix A  
Force-feeding refers to any form of human-intervened (mechanical or manual) assisted feeding which causes an animal to eat more than it naturally would consume. This is commonly done to produce foie gras (fatty liver) in some ducks and geese.  
M&S prohibits the use of any feather and down material that has come from birds who have been reared for the Foie Gras industry
- As a minimum standard, we expect all our feather and down suppliers to either the IDFL Down Standard (IDS), the Responsible Down Standard (RDS) with accompanying Transaction Certificate (TC) or the Traceable Down Standard (TDS)

- Traditionally most feather and down is sourced from geese or duck species, however this policy applies to all natural feathers that may be used for M&S production. If the feathers are sourced from bird species other than ducks or geese, then the Foie Gras risk is not relevant but the species and source must be identified and stated.
- The scope of the Responsible M&S feather and down policy begins from and includes the raising farm(s) – Raising Farms are defined as farms where birds live in preparation for meat production.
- In addition to the raising farm, the scope of the Responsible Feather and Down policy must also include **all** downstream supply chain actors involved in M&S production – including the final garment/product manufacturer.

## **M&S recognised standards and audit protocols**

### **1. IDFL (International Down and Feather Testing Laboratory)**

#### **About IDFL Laboratory and Institute**

IDFL is the global leader in filled textile testing. Founded in 1978 in Salt Lake City, IDFL is the largest down and feather laboratory in the world. IDFL has since expanded to include [textile testing](#), [synthetic fill testing](#), [natural fill testing](#) and [inspection and audit services](#). IDFL has laboratories in [USA](#), [Europe](#), [China](#), and Taiwan to service all corners of the globe.

#### **IDFL Down Standard (IDS)**

The purpose of the IDFL down standard (IDS) is to verify that down and feather products are ethically sourced.

#### **Scope of IDFL Down Standard**

The scope of the IDFL Down Standard for all M&S production must begin from and include the raising farm(s) – Raising Farms are defined as farms where birds live in preparation for meat production.

To meet the requirements of the M&S Responsible Feather and Down Sourcing Policy The scope of the IDFL Down Standard must also include all supply chain actors including the final garment/product manufacturer.

#### **IDS Certification**

**Certification Body:** Currently, IDFL is the only authorized certification body and auditor for IDS.  
**For M&S production routes, certificates are valid for one year**

**Modifications:** Any modifications to the certified supply chain (such as a change of suppliers) invalidate the certificate until the modifications can be evaluated according to the certification requirements. It is the responsibility of the applicant to report modifications to IDFL.

## **IDS Certification Requirements**

Each supplier in the supply chain must comply with the requirements of the following categories.

- General Operations
- Traceability (must begin with the Raising Farm)
- No Live-Plucking
- Animal Welfare
- Human Welfare and Corporate Responsibility
- No Force Feeding

In addition to these requirements above, the IDFL audit should also assess the following;

## **Animal Welfare**

IDFL standards on animal welfare adhere to standards developed by the Farm Animal Welfare Council (FAWC): THE FIVE FREEDOMS

1. Freedom from hunger or thirst.
2. Freedom from discomfort.
3. Freedom from pain, injury or disease.
4. Freedom to express normal behaviour.
5. Freedom from fear and distress.

In the case where down and feather are sourced from small farms (<100 waterfowl) or poultry markets (usually collector-based supply chains), then a representative sampling of the farms must be taken in those areas.

## **M&S Minimum compliance requirements –**

- **Supplier must provide a copy of the IDS (IDFL Down Standard) certificate and final supply chain audit report to the M&S departmental technologist**



## 2. The Responsible Down Standard

Please note the Responsible Down Standard is an independently verifiable feather and down certification standard and available and if the supplier already has a valid certificate for its supply chain, or if they prefer to apply for one of this standard. RDS certification is acceptable to M&S as an alternative to the IDFL audit if they meet the requirements listed below.

The supplier must also send a transaction certificate (TC) associated with the M&S order(s).

The Transaction Document should match the contents of the M&S order that has been placed and should be provided by the appropriate Certification Body.

Modules: The RDS standard consists of four modules;

1. Farm module
2. Slaughter module
3. Transport module
4. Small farmer group module (SFG)
5. TE content claim standard

Please note there is an optional Parent Farm Certification which audits back to and including the parent bird farm. This additional module is not required to be within the audit scope to meet minimum compliance to the M&S Responsible Feather and Down sourcing policy

### RDS STANDARD REQUIREMENTS

There are four types of requirements in the standard: 'CRITICAL MAJOR', 'MAJOR', 'MINOR' and 'RECOMMENDATION'.

**CRITICAL MAJOR** requirements are the most important and they shall all be met during the audit to achieve and/or maintain certification. If non-compliance to any of the CRITICAL MAJOR requirements is found, the certificate of the site shall be immediately suspended and the supply chain will be informed. No down or waterfowl will qualify as certified until the corrections are made and verified. In the case of an initial audit, the site's request for certification shall be denied. If a site does not correct its CRITICAL MAJOR non-compliances within 6 months, they shall have to re-apply for certification.

**MAJOR** requirements shall be met to achieve certification. If non-compliance to any MAJOR requirements is found, the site has 60 days to prove compliance to the satisfaction of the Certification Body. During this time, the down and/or waterfowl may still be sold under certification (except in the case of an initial audit). If the site fails to correct MAJOR non-compliances within 60 days after the audit, the certificate shall be suspended and the supply chain informed. In the case of an initial audit, the site shall not receive any certification until all MAJOR non-compliances are closed.

**MINOR** requirements are important; therefore, all minor requirements shall be fully audited by the Certification Body. 50% of MINOR requirements per module shall be met for certification. If less than

50% of the MINOR requirements are met, the site will have up to 60 days to demonstrate compliance to a minimum level of 50% of the MINOR requirements. At the discretion of the Certification Body, a plan of action may be accepted to demonstrate compliance. In future versions of the standard, the compliance rate for MINOR requirements may be increased.

For all levels of requirements, initial certifications are not given until the required number of non-compliances identified by the Certification Body have been corrected and verified.

**RECOMMENDATIONS** are not required to be met to receive certification. They serve as guidance and are recommended based on best practices in the industry, and may be integrated as requirements in future versions of the standard. All RECOMMENDATIONS shall be fully audited and recorded by the Certification Body, but do not have any effect on the certification status of the site.

- Responsible Down Standard (RDS) – must be audited by an accredited certifier e.g. IDFL, Control Union or ICEA
- Scope is hatchling to jacket (industrial and collector based farm models) to meet M&S minimum standards (Parent farm certification is optional)
- Please note that it is a condition of RDS that the audit is renewed every 12-14 months

#### **M&S Minimum compliance requirements –**

- **Supplier must provide a copy of the valid RDS (Responsible Down Standard) certificate and final supply chain audit report to the M&S departmental technologist.**
- The supplier must also send a transaction certificate (TC) associated with the M&S order(s).
- A Transaction Certificate (TC) should match the contents of the M&S order that has been placed and should be provided by the supplier. This Transaction Certificate must be stamped and signed by the Certifying Body and a scan of the original TC must be sent to the relevant Marks & Spencer technologist.

<https://www.textileexchange.org/standards-integrity/standards/responsible-down-standard>

### **3.Traceable Down Standard**

NSF International can certify all elements of the down supply chain to the Global Traceable Down Standard (Global TDS). The standard ensures that down in garments and other household and commercial products comes from a responsible source that respects animal welfare and can be transparently traced.

The Global TDS goes beyond current industry practice to include the parent farm in the auditing while other programs start at the hatchery. Because parent farm animals live longer, they can be at greater risk for live plucking.

The Global TDS also involves a chain of custody component that verifies that traceability systems are in place throughout the entire supply chain. Full traceability provides assurance that conventional down has not been mixed with certified down. Certification is provided not only at the product level but to the full supply chain feeding into the product line.

### **Certification levels**

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

**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.

**Conformant level compliance to the Traceable Down Standard is a minimum requirement to comply with the M&S Responsible Feather and Down Policy**

**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”.

**Advanced level compliance to the Traceable Down Standard also qualifies as a Plan A attribute**

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.

<http://www.nsf.org/services/by-industry/sustainability-environment/sustainable-textiles>

## Feather and Down Plan A attributes

Either one or more of the following additions to the minimum requirements would qualify for a Plan A attribute

1. A supplier will be deemed to be VERY LOW RISK and awarded a Plan A attribute by M&S if they meet the following;  
EITHER IDFL Down Standard audit meets ALL the “RECOMMENDED” classifications for all modules/supply chain actors assessed for the relevant M&S product  
OR Responsible Down Standard (RDS) audit meets 100% OF MINOR LEVELS and 100% OF ALL RECOMMENDATIONS for all modules/supply chain actors assessed for the relevant M&S product. In either case the detailed audit report must be disclosed to the M&S technologist for verification
2. Recycled Feather and Down – must be minimum 50% recycled and certified to either GRS (Global Recycling Standard) or RCS (Recycling Content Standard) standard
3. (COMPLIANCE AUDIT + Parent Bird module) – compliance to the Responsible Down Standard or the IDFL Down Standard **plus** the additional Parent Bird Module as part of the audit scope.  
Please note that RDS or IDS compliance which does not include the Parent Bird module qualifies for minimum compliance only to the M&S Responsible Feather and Down sourcing policy. The Plan A attribute must only be awarded for a product that demonstrates compliance to the RDS or IDS PLUS the Parent Bird module

## **APPENDIX A**

### **Foie Gras**

Foie gras means 'fatty liver', a product produced from the livers of force-fed ducks or geese and used to produce foodstuffs such as pâté de foie gras. The production of foie gras can cause many serious welfare problems it causes for the birds involved, including:

- Force-feeding prevents birds from carrying out their normal feeding behaviour.
- The feeding pipe can damage the birds' throats.
- The handling involved during force-feeding can be stressful.
- Birds' livers may become 6 to 10 times the normal size and stop working properly.
- The keeping of birds in small, individual cages doesn't allow the birds to stand, walk, preen, stretch their wings or carry out their normal behaviour properly.

## **APPENDIX B**

### ***Contact Details and links***

#### **IDFL**

Website - <http://www.idfl.com/>

US contact email - [info@idfl.com](mailto:info@idfl.com)

Europe contact email - [europe@idfl.com](mailto:europe@idfl.com)

China contact email - [china@idfl.com](mailto:china@idfl.com)

Taiwan contact email - [taiwan@idfl.com](mailto:taiwan@idfl.com)

#### **RDS**

<https://www.textileexchange.org/standards-integrity/standards/responsible-down-standard>

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