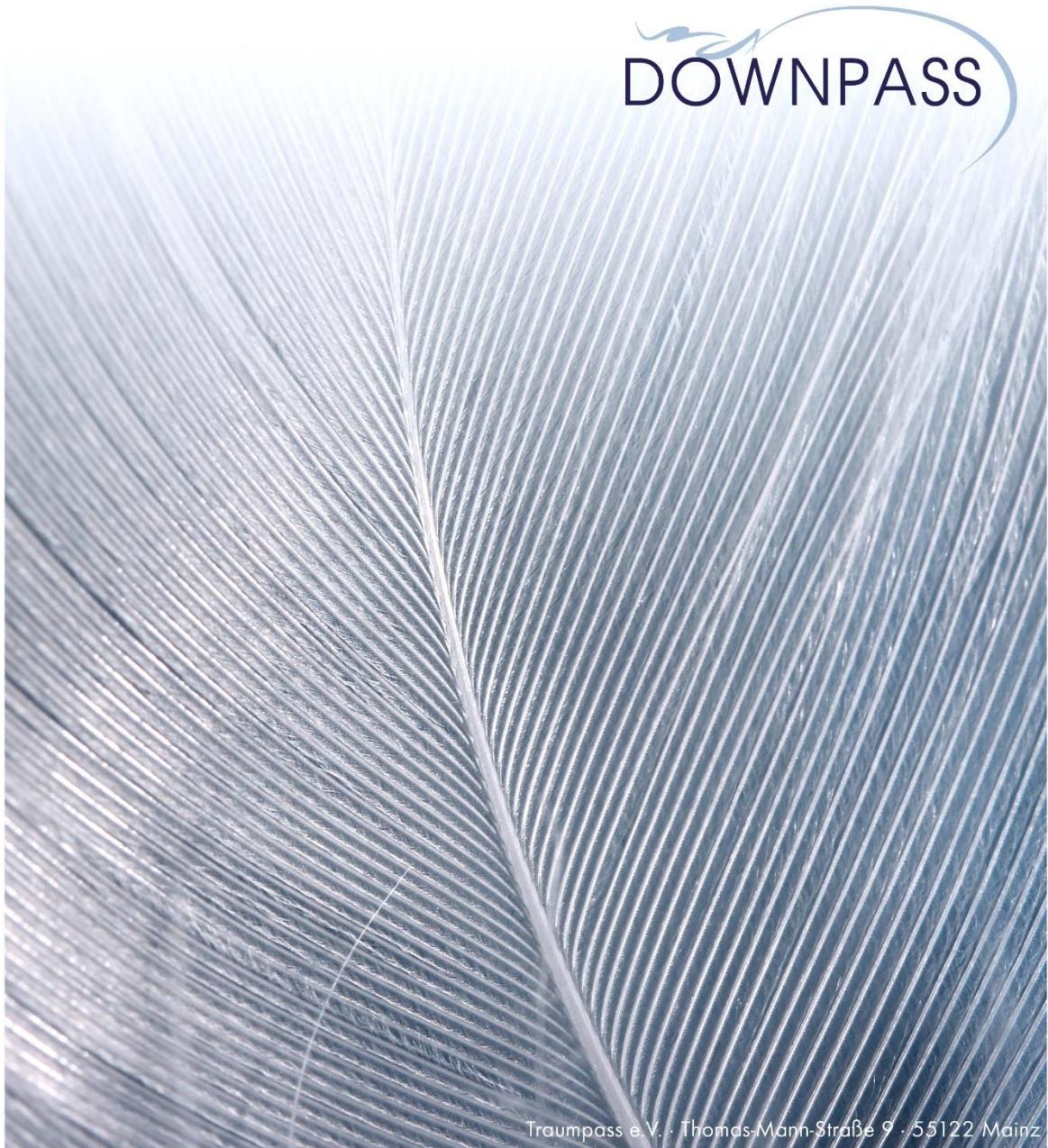


DOWNPASS-Standard

Requirements for the testing and traceability of the flow of goods
Requirements for the chain of custody through audits carried out by Traumpass e. V. (AG Mainz VR 3098)
Basic principles for product labelling with the registered trademark 'DOWNPASS'



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

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Traumpass e V.

Thomas-Mann-Str. 9

55122 Mainz

represented by Dr. J. Hedderich, Dipl. Volkswirtin – Business Management

Aim and area of application

The DOWNPASS-Standard (hereafter “Standard”) aims to globally promote the proper raising of geese and ducks kept for farming purposes. This includes the responsible sourcing of feathers and down. Traceability must be comprehensively documented in order to ensure a transparent supply chain. In addition, the composition of the filling material is inspected. By advocating the proper and user-friendly labelling of the filling, the Standard offers decision support to the market through the use of the DOWNPASS brand. This Standard applies to all feather and down filling material used in bedding, clothing and outdoor products.

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

This standard is applicable to

- licensees of 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 areas 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 according to the Standard.

• **Parallel production**

The breeding and/or raising of DOWNPASS certified waterfowl at the same facility as non-certified waterfowl.

Likewise for DOWNPASS additional module 1, parallel production refers to the breeding and raising of waterfowl that are used for foie gras production at the same facility with waterfowl that are not used for foie gras production.

• **Waterfowl farms**

Farms operated with a goal of raising waterfowl. They encompass:

1. Large farms (more than 500 animals)
2. Small farms
 - a. Small individual farms (less than 500 but more than 100 animals)
 - b. Groups of small farms with the following characteristics
 - i. They are in a strictly defined geographical area

- ii. They are homogeneous
- iii. They have less than 100 animals per group member
- iv. The raising of waterfowl is only for regional use or personal subsistence 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". Small farms give their harvested feathers and down to organizations such as feather collectors or feather collecting plants.

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

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

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

Companies that procure and process feathers and down. They mix, wash, dry and/or sort feathers and down. They may also manufacture semi-finished, end and/or finished products.

• ***Bulk feathers and down***

Bulk feathers and down can be raw, semi-processed, processed or end material (ready for use as filling). Bulk down and feathers as designated in the Standard have had their weight recorded, have been successfully audited and have been labelled with their composition.

• ***DOWNPASS filling***

Feathers and down that have not been obtained from live animals and meet the requirements of this Standard.

• ***Transport containers***

All types of containers (for example bales) that can be sealed and marked with the DOWNPASS label and 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 certification used to record the entire journey of a defined quantity of feathers and down through the supply chain, in accordance with the chosen DOWNPASS additional modules.

Chain-of-custody auditing can begin with the raising and feeding of goslings and/or ducklings and includes animal transportation, slaughter and further processing steps/stages for handling or processing feathers and down, ending with the bulk material or finished filled product.

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

- **DOWNPASS**

Only feathers and down that have not been obtained from live animals may be used. An exception is granted as regards eider down won in accordance with the valid legal regulations.

The feathers and down are removed after the animals have been slaughtered at a slaughterhouse or farm. The starting point for auditing can be:

1. the slaughterhouse
2. authorised collecting companies with operating and/or export licences

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

- **Optional DOWNPASS additional modules**

To enhance DOWNPASS, additional modules can be included in the auditing and inspection process according to customer request. Each additional module must be separately documented and successfully audited.

- ***DOWNPASS additional modules***

DOWNPASS additional module 1 (no force-feeding)

The documentation and successful auditing of the supply chain verifying that feathers and down were not obtained from animals being kept to produce foie gras.

DOWNPASS additional module 2 (raising farm)

The documentation and successful auditing of the supply chain for feather and down filling materials obtained from animals whose origin can be traced back to the location where the goslings and/or ducklings were raised.

DOWNPASS additional module 3 (parent farm)

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

The DOWNPASS additional modules may be combined.

- ***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.

- ***DOWNPASS product labelling***

Labelling may also be attached to the products or transport containers via a hangtag, sticker, imprint, QR code or similar device. The labels can reference the selected DOWNPASS additional modules.

- ***DOWNPASS management system***

The DOWNPASS management system is based on ISO 9001:2015 and on the documentation of the supply chain. This was developed by 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 brand agree to accept and sign the current version of the DOWNPASS Code of Conduct.

The basic principles for awarding products with the label "DOWNPASS 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 / end products
- b) feather- and down-filled bedding
- 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 must 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 would always apply.

In the case of bulk down and feathers (semi-finished, pre-treated, or raw), the quality evaluation is done by a simplified composition (content) test. This is performed by manually separating the down from the other components. The percent by weight of the down must meet or exceed the down percentage claimed on the purchase order delivery notice or other documentation. The displayed down content is a minimum requirement, transgressions are permitted.

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

a) DOWNPASS requirements

Feathers and down may not be harvested from live animals.

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

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

b) DOWNPASS additional module requirements

The basis of determining traceability is compiled from Sections 2 and 3a and the requirements of the additional modules. (The additional modules may be combined.)

○ *DOWNPASS additional module 1 (no force feeding)*

The labelled filling material meets the basic requirements of DOWNPASS and must not be harvested from animals being raised to produce foie gras.

In addition to the complete documentation, the supply chain must be audited. This requires both inspections of the business premises and documentation reviews.

For additional module 1, the audits can begin at the slaughterhouse. After the documentation is reviewed, the slaughterhouse is inspected and operating procedures are examined. This slaughterhouse inspection may be extended to include a review of the suppliers.

Thereafter, the audit, inspection and testing includes all subsequent stages of delivery and further processing of the feather and down filling material, as well as transportation to the manufacturer of the semi-finished or finished product. The audit will verify that no feathers or down in the supply chain are a by-product of foie gras production. Existing inspection and audit reports for the production sites may be recognized by the auditor.

○ *DOWNPASS additional module 2 (raising farm)*

The labelled filling meets the requirements of DOWNPASS and must be traceable back to the farm where goslings or ducklings are raised. Inspections and documentation checks are required to audit the supply chain.

For additional module 2, the audit begins with documentation reviews and inspection of the farms where ducklings or goslings are raised. The audits also include inspections and documentation reviews of all subsequent stages of transportation, slaughter of the animals and further processing of the feather and down filling material, ending with the semi-finished, finished, or end products.

- *DOWNPASS additional module 3 (raising farm and parent farm)*

The labelled filling meets the requirements of DOWNPASS and must be traceable back to the raising farm and the parent farm. Inspections and documentation checks are required to audit the supply chain.

For additional module 3, the audits begin with documentation reviews and inspections of parent stock farms. The inspections also include all subsequent stages of the hatchery, transportation, raising of gosling and duckling, slaughter and further processing of the feather and down filling material ending with the semi-finished, finished and/or end products.

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 at all stages of the supply chain, in addition to quality testing. The scope of the audit is defined by the specific module(s) chosen.

2. Documentation check requirements and inspection requirements

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

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). It is not sufficient solely to determine the total mass (weight).
- 3) Definition of batch size and components (Determination of the entire 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 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 and plausibility checks.
- 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 physical criteria
- 9) Inspection of the Certificates of Origin, delivery notes, customs declarations and test protocols for increased 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 measures initiated to correct these deviations.
- 13) Examination of the audit reports of pre-suppliers (with regard to the chosen DOWNPASS additional modules)
- 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 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 (for example, 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 prevent the slaughter of animals raised to produce foie gras (additional module 1)
- 5) Verification of operating personnel technical knowledge through interviews.
- 6) Verification of the personnel training program including review of 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 unconsciousness throughout the slaughtering process so they are spared preventable suffering.
 - For an audit according to additional modules 1 to 3, the exact age of the animal must be documented. Additionally, the slaughtering facilities and equipment 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 licences 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.
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- *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 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, 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. (*additional module 1*)

6) Parallel production for the live harvesting of feathers and down is not allowed. For Module 1, parallel production of animals for foie gras is not allowed. It is not allowed to give the animals to another farm for this.

- 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

Inspection principles (in accordance with the requirements of the corresponding additional modules), please refer to Implementation Rules

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

In order to obtain a random sample for the auditing of farms, a homogeneous set is built by determining the geographical catchment area of the slaughter house. The details are provided in the Implementation Rules.

4. Instructions for performing audits of farms 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 farms, a homogeneous set is built by determining the geographical catchment area of the slaughter house. The details are provided in 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 checked. The auditing of small farms is performed according to the regulations of the DOWNPASS additional modules.

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 respective additional module(s).

To inspect small farms and feather collecting plants, the auditor takes a random sample from the homogeneous set by determining the geographically defined catchment area of the collecting plant / the small farms and the number of collecting plants / 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 (depending on the DOWNPASS additional modules) are:

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

Exclusion criteria result in not awarding the DOWNPASS certificate to the audited company or to 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 hand out a DOWNPASS certificate with regard to the respective additional module.

Examples of major deviations are:

- Basic proofs for the documentation for the traceability of the respective additional module are not present / contain gaping holes.

Major deviations require a repeat audit by the auditor, who must 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 or extended, 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 according to the respective additional module if these 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 by the auditor is not necessary. If the minor deviation cannot be 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 breeding 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, here after referred to as 'user', is a member or licensee of Traupass e. V. and must have met all their obligations towards Traupass 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 Traupass e. V. in written form.

3.

The user must observe the valid Traupass e. V. DOWNPASS-Standard, and have successfully passed the audits and quality inspections as stipulated in the selected additional modules.

4.

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

5.

The user must document compliance with the requirements of DOWNPASS and any selected additional modules, 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 depends on the DOWNPASS additional modules selected.

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 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 equip all transport containers carrying DOWNPASS goods with the DOWNPASS label. Finished products may also be marked 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 and finished products carrying the DOWNPASS label that are transported in the labelled transport containers, along 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 to store them separately.

13.

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

The user must amend / modify their terms and conditions to comply with the requirements of the DOWNPASS Code of Conduct to document that products labelled with the DOWNPASS seal will be monitored.

15.

The user is responsible for ensuring that audits are carried out every two years; otherwise, section 10 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 will receive 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 give the start and expiration date of the certificate and the audited modules. 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 will then be examined by a testing laboratory authorized by Traumpass e. V. The tests are based on the requirements of the specific labelling used. Quality requirement 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 will be imposed by the notary appointed by Traumpass e. V.

8.

Traumpass e. V. will provide relevant parties via the website or the extranet a list of companies that have successfully passed both the audit and the quality inspection. Companies that have been deprived of the right to use DOWNPASS will be 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.

A testing institute approved by Traumpass e. V. ("auditor") will be commissioned to carry out audits / inspection visits to verify the documented traceability of users of the DOWNPASS label. Auditing institutes must act in a neutral, independent manner and must be qualified according to ISO 19011, ISO 17065 or comparable regulations.

2.

The testing institute approved by Traumpass e. V. will carry out a review (inspection) of the user's business 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.

5

The auditor must also carry out unannounced audits.

Unannounced audits: The auditor defines a time frame of three months during which the audit will take place. Further announcements are not made.

From a homogeneous set of companies, random audits are conducted.

In order to determine the homogeneous set, the following criteria are taken into account:

- Type of company
- Type of additional module
- Evaluate risk by taking into account the following factors:
 - o Evaluation of former audits;
 - o Information relevant to the audit;
 - o Regional customs (such as harvesting down and feathers from live animals, foie gras production).

The random sample is calculated by using the formula:

Random sample = square root from the number of companies that build the homogenous set

15% of the number of companies from the homogenous set that are audited by the accredited testing institute should be examined within the framework of unannounced audits in the respective audit time frame.

Unannounced audits on geese and/or duck farms should be carried out mainly in summer as a complete farm inspection or through perimeter audits if access to the farm is not possible.

6.

The auditor is required to note all peculiarities observed during an audit. If, during unannounced or repeat audits, violations and/or major deviations from the results of 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 or a different violation is detected that will lead to the revocation of the certificate, Traumpass e. V. and all affected companies are to be informed.

In performing the audit (inspection), ISO 19011, ISO 17065 and normative references mentioned in those standards as well as the regulations of this Standard are valid. See 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. shall 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 modules chosen, reports detailing deviations from the Standard and the corrections undertaken.

6.

Auditor assessment (audit passed/improvement required / failed)

Section 8

Audit Report Validity

The audit report is valid for 24 months. To determine the length of its validity, the date of the audit report shall prevail. 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 shall lose their right to use the DOWNPASS label without the need for explicit notification from Traumpass e. V.

Traceability audits for the flow of goods/supply chain must be completed at least four weeks before the deadline of 30.09 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 Traumpass e. V. or licensees who already have valid certification of the entire change of custody from the starting point of the respective module through Traumpass e. V. or possess Traumpass e. V. certificates are exempt from the DOWNPASS audit.

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

Additionally, audit reports of comparable traceability systems of down and feathers can be recognized by the board of executives of Traumpass e. V. in accordance 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.