

# Summary Paper – Draft 2

## Animal Materials

The development towards a unified standard system has been underway since we first announced our Climate+ strategy in 2019. After receiving inputs and approval from an International Working Group (IWG), the first draft standard was made available for public comments between May – July 14, 2023. The second draft of the standard will be available for public comments between September 27th and November 12th. You can find a full version of the draft and learn more about how to provide feedback [here](#).

### Introduction

At Textile Exchange, our organizational goal is to help drive a 45% reduction in the greenhouse gas emissions that come from fiber and material production by 2030, while driving positive impacts across soil health, water, and biodiversity, as well as human rights & livelihoods, animal welfare, and chemical management. We call this Climate+.

The unified standard aims to meaningfully embed the Climate+ goal into the raw material scope for all materials included in our certification. An additional objective is to harmonize systems across the full scope of our current standards and to create stronger communication at the consumer-facing level.

We are releasing content of the standard in stages. For the first draft consultation, most of the standard criteria in the areas of organizational management, human rights, land use, animal welfare, and processing facilities were available for comment. Each criterion was tagged as a conformance-related criterion (binding for certification) or leadership criterion (non-binding for certification, but just a recommendation).

For public consultation on the second draft, we are releasing the revised content from the first draft based on feedback received. Additionally, new draft content is included, covering criteria for group certification, chain of custody, claims and logo use, and slaughterhouses, as well as monitoring, evaluation, and learning (MEL) indicators.

The main impact areas of the unified standard system focus on Tier 4 raw material management (including the cultivation and extraction of raw materials from the earth, plants, or animals), and “Tier 3.5” first processing (including processes such as ginning, retting, degumming, cottonizing, wool scouring, dissolving pulp, and chemical/mechanical recycling).

To provide highlights on key material categories included in the future standard system, we have developed a series of summary papers to supplement the draft standard criteria. The materials proposed for the scope of the unified standard include:

- Animal-derived: sheep wool, mohair, alpaca, down, and skins
- Recycled: synthetic and natural materials

Consequently, some of the materials proposed for inclusion within the scope of the unified standard will be added through the recognition of external standards rather than through direct Textile Exchange raw material certification. These materials are:

- Animal Derived: Cashmere
- Biomaterials: Biosynthetics
- Forest Derived: MMCF
- Fiber Crops: Cotton

## Background

We have two overarching objectives for the unified standard. The first connects to the number of certified sites participating across the eight standards that we currently offer. With this transition, we have the opportunity to provide efficiency by bringing all materials in the scope of these standards under one harmonized system. The second objective is to embed our Climate+ goal and drive impact and outcomes through participation in standards and certification.

Currently, each material-specific standard (GRS, RCS, RWS, RMS, RAS, and RDS)<sup>1</sup> was developed separately and operates uniquely in terms of structure and reach. Each standard also incorporates its unique focus areas. While standards like the RWS, RMS, and RAS all contain land management and social criteria, the RDS does not include those attributes. In contrast, the journey towards unifying this system has focused on exploring where it is relevant and meaningful to incorporate Climate+ and other key impact areas, addressing how the material is managed on the ground as well as the first stage of production.

This shift in scope represents our standard for raw material certification. Certified materials will be tracked through the supply chain with our pre-existing chain of custody standard: the Content Claim Standard (CCS). While the CCS continues to provide the mechanism for tracking and handling of the certified inputs through to the finished product, the unified standard impact criteria are being developed for Tiers 4 and 3.5 of the supply chain.

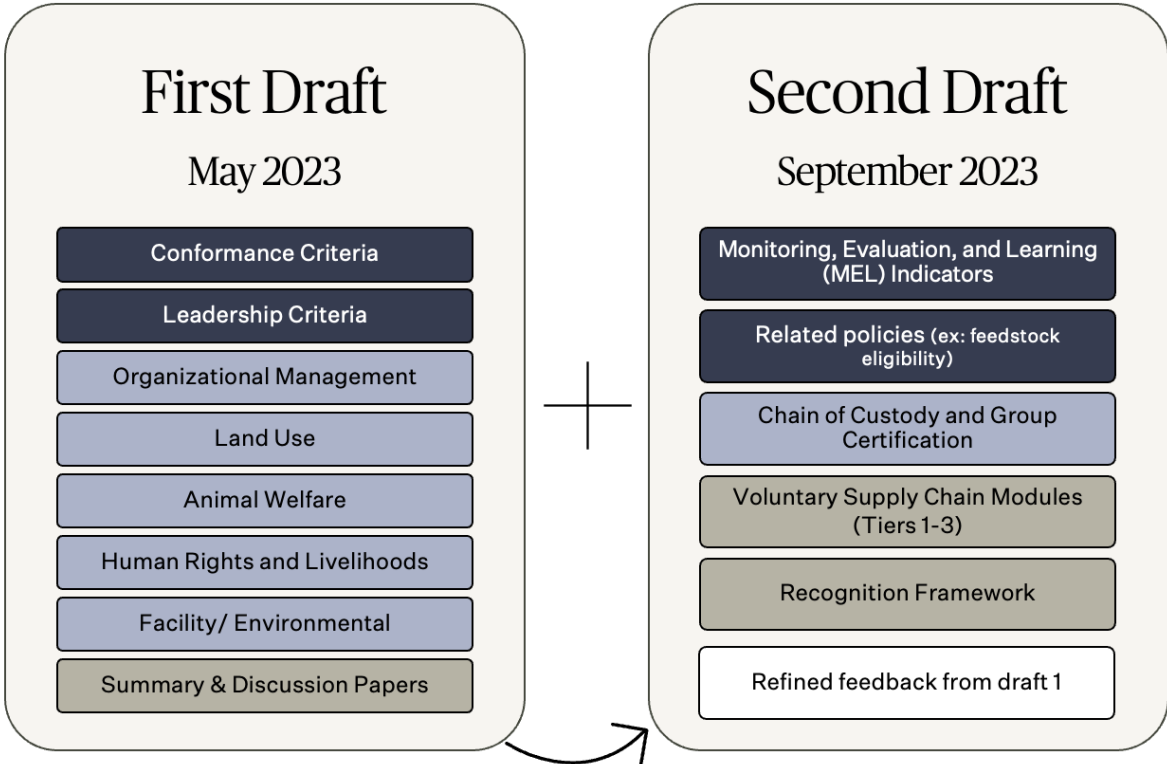
## Timeline

Similar to the process of moving from the first to the second drafts of the standard, stakeholders' feedback from the second consultation will be considered in changes made as we move to approve a final version of the standard at the end of 2023. The final version is planned for publication in early 2024 to be used for pilot testing and implementation planning. Throughout the year 2024, we will conduct a full internal systems update to align with the new standard, as well as provide the necessary implementation planning for all stakeholders in the system (e.g., taking adequate time to align across our assurance system, the accreditation and certification bodies' systems, and for sites to prepare their operations to get certified). We will also update pre-existing documents to reflect the harmonized standards system.

Our current timeline has the standard becoming effective in 2025. During 2025, sites may request certification to the unified standard, but this will still be optional as this year is transitional for sites already certified to any of the previous standards (i.e., Global Recycled Standard – GRS, Recycled Claim Standard – RCS, Responsible Wool Standard – RWS, Responsible Mohair Standard – RMS, Responsible Alpaca Standard – RAS, Responsible Down Standard – RDS). During 2025, new certification applicants will have the option to request their audit to the unified standard, or to the applicable stand-alone standard, however we would encourage certification to the unified standard, given they will have to transition the following year.

In 2026, the standard will be mandatory for both already certified sites as well as for new applicants, meaning all sites will need to be certified to the unified standard system. Existing previous standards superseded by the unified standard will be retired.

Overview of the standard structure



Section	Subsection
1. Organizational Management	1.1. General Requirements
	1.2. Shared Responsibilities
2. Human Rights and Livelihoods	2.1. Policies, Management Systems and Records
	2.2. Labor Rights
	2.3. Social Justice
	2.4. Livelihoods
	2.5. Management of Waste Collection for Recycled Inputs
3. Land Use	3.1. Management Plan
	3.2. Soil Health
	3.3. Soil Nutrients
	3.4. Pest Management
	3.5. Water Management
	3.6. Conservation of Biodiversity
4. Animal Welfare	4.1. Health and Welfare Plan
	4.2. Animal Nutrition
	4.3. Living Environment
	4.4. Husbandry Procedures
	4.5. Animal Shearing
	4.6. Herd Management
	4.7. Breeding, Birthing, and Caring for Young Animals
	4.8. Handling and Transport
	4.9. Handling and Transport Managed by the Organization
	4.10. Euthanasia and On-Farm Slaughter
	4.11. Slaughterhouse
5. Processing Facility	5.1. Environmental Management System
	5.2. Chemical Management and Restrictions
	5.3. Waste Management
	5.4. Water Use and Discharge
	5.5. Air Emissions
	5.6. Energy Use
6. Chain of Custody	6.1. Applicability of the Content Claim Standard
	6.2. Material Handling
	6.3. Volume Reconciliation
	6.4. Sale of Certified Materials
	6.5. Logo Use and Claims
7. Group Certification	7.1. Group Management
	7.2. Internal Control System
	7.3. Group Member Requirements
	7.4. Inspection of Members
	7.5. Adding and Removing Members

*\*Section 1-5: Included in First Draft*

The following information provides details on content that is new since the first draft. New content ranges from changes to standard criteria from Draft 1 to Draft 2, new sections that were not in Draft 1, as well as new concept areas being developed that supplement the standard.

## Updates from Draft 1

The following is an overall summary of what has changed for animal materials from the Responsible Down Standard (RDS) and the Responsible Animal Fibers (RAF) standards – comprising the Responsible Wool Standard (RWS), Responsible Mohair Standard (RMS), and Responsible Alpaca Standard (RAS) – to Draft 1 of the unified standard and the new Draft 2.

### Yak

The criteria for yak that were introduced in Draft 1 have been removed from the scope of Draft 2. Work had been carried out researching relevant welfare and land use topics for yak, and there were reviewers both in favor and against including yak within scope. However, it has been decided that it is more important to focus on priority materials at this time.

### Performance determination

A key addition for Draft 2 is the introduction of performance determination for each criterion to better inform the intent of the criteria and to add detail on what the auditor will assess.

Selected examples include:

- Defining “prompt” for prompt treatment under 4.1.15.
- Listing acceptable circumstances for temporary tethering or close confinement under 4.3.19.
- Details for what makes bedding “sufficient to avoid discomfort” under 4.3.28.
- Listing suitable environmental enrichments for waterfowl required under 4.3.45.
- Clarifying maternal bonding that must occur before any husbandry procedures take place under 4.4.3.
- Describing the difference between slipping and falling at the slaughterhouse under 4.11.20.

## Animal Welfare

### • Health and welfare plan

- A new minor conformance level criterion was added in Draft 2 to align with RDS for a vet to review the health plan [this could be carried out remotely].
- A new minor conformance level criterion was added in Draft 2 to align with RDS that prohibits the treatment of sick or injured animals being withheld in order to preserve eligibility for markets that prohibit certain products (for example some meat programs prohibit the use of antibiotics).

### • Nutrition

- Alignment was made with RDS to prohibit the use of growth promoters, as a new minor conformance level criterion.

### • Living environment

- A recommendation that animals have access to natural light became a minor conformance-related criterion in Draft 2.
- Alignment was made with RDS that, where automated or mechanical systems for ventilation are needed to maintain air quality, an alarm system is present that alerts workers to the failure of these systems. This is low risk for fiber animals.

### • Husbandry procedures

- The RAF allowance for goats to be castrated with bloodless emasculator at up to 14 weeks, that was inadvertently omitted from Draft 1, was reintroduced in Draft 2.
- Details on later castration of sheep and goats carried out by a vet with mandatory pain relief that were previously only covered in the User Manual for RWS and RMS were included as conformance-related criteria in Draft 2.

- The possibility to use a scalpel (cold knife) for tail docking sheep – but only when pain relief is available and used – was added in Draft 2.

- **Shearing**

- The requirement that alpacas are restrained for the minimum amount of time needed to shear them has been extended to sheep and goats in Draft 2. Restraint includes holding the animal so it cannot move freely. The performance determination gives an indication of the expected time needed to shear each type of animal.

- **Herd management**

- A new criterion about avoidance of mixing animals was introduced in Draft 1 but generated a lot of confusion as it was read as if there was a prohibition on mixed species grazing which was not the intent. Amended wording and performance determination for Draft 2 should resolve this.

- **Breeding, birthing, and caring for young animals**

- The User Manual guidance from RAF, which described when electroejaculation was permitted, was added as the requirement within the standard for Draft 2 and limits this procedure to vets. A new criterion requiring vets to undertake any cesarean sections has been added to Draft 2.
- The removal of milk from the diet of young animals is adapted according to whether the animal is being artificially or naturally reared. The weaning age for lambs and kids reared by their mothers was increased from Draft 1 to Draft 2.

- **Handling and transport**

- Some amendments were made to the requirements around the use of working dogs for Draft 2, but the principle that working dogs are under the control of the worker remains.

- **Handling and transport managed by the certified organization**

- An exemption for the requirement to provide feed and water after 24 hours of transport (for species/types of animals permitted to be transported for this long) if the entire journey could be completed within 30 hours was removed in Draft 2.
- The recommendation from the RDS that vehicles transporting animals should be clearly labeled as such on the outside of the transport vehicle in the local language has been incorporated as a recommendation for all species in Draft 2.

- **Euthanasia and on-farm slaughter**

- A list of acceptable methods for stunning animals for euthanasia has been added. RAF includes a list of methods for on-farm slaughter but not euthanasia.
- The signs that must be observed to confirm death have been updated.

- **Slaughterhouse**

- Slaughterhouse requirements are mandatory for sites involved in producing skins from fiber animals, and IF the organization wants to make certification claims about those skins.
- In addition to the RAF requirements, the RDS requirement that slaughter sites comply with applicable legislation has been added for fiber animals in Draft 2.

## **Animal Fibers (sheep wool, mohair, and alpaca)**

- **Management plans**

- The Land Management Plan was renamed to the Soil Health and Land Management Plan in Draft 2 to ensure clarity on which focus area of the Land Use section it relates to.
- Land tenure description has been added as a requirement in the management plan.
- **Soil health**
  - Land degradation has been changed to the degradation of vegetation cover in the criterion related to the prevention or minimization of land degradation.
  - The criterion calling for the monitoring of levels of soil organic matter was removed in Draft 2.
- **Fertilizer management**
  - An amendment to clarify that the nutrient management plan needs to be a written document was added in Draft 2.
- **Pest management**
  - An amendment to clarify that the IPM plan or strategy needs to be a written document was added in Draft 2.
  - Recognition that the requirement for the management of the risk of facial eczema only applies where the risk is applicable was added.
- **Water management**
  - No additional amendments in Draft 2.
- **Biodiversity management**
  - From the review of the first draft of the standard, it became evident that more clarity is needed on how and when the criterion permitting the use of a baiting program applies. It is for this reason that this criterion has been expanded to include sub-criteria (rather than the originally proposed list), each with its own performance determinations, to reiterate that this intervention only applies to extreme conditions required to control invasive species where other interventions have failed and only if all sub-criteria are met.
  - Agroecology has been included in the recommended criteria in Draft 2 encouraging an ecological systems approach to production management.

## Down

- **Health and welfare plan**
  - Down is included in what was originally an RAF criterion that requires veterinary or specialist input when advice is needed on prevention, treatment and/or strategies to avoid the development of resistant parasites.
  - Down is included in another requirement originating from RAF that ensures non-certified animals on the certified site are not subject to inhumane treatment.
- **Herd management**
  - A minor conformance-based criterion to avoid mixing birds within certified flocks (i.e., maintaining flocks as a single group from hatch to slaughter), has been added to align with animal fiber criteria.
  - Two conformance-based criteria minimizing the isolation of individual birds, and where this is unavoidable providing them with at least visual contact with other birds, have been added to align with animal fiber criteria.
  - A major conformance-based criteria has been added requiring that any livestock guardian animals that are used to protect waterfowl (most likely with free-ranging

flocks) are suitable for the farm environment and expected predator threat. This aligns with animal fiber criteria.

- **Handling and transport**

- A new major conformance-based criterion has been added requiring calm movement at a relaxed pace in situations where waterfowl may be herded on foot, for example when free-ranging birds are moved from place to place. This aligns with an animal fiber criterion.
- A new minor conformance-based criterion has been added that prohibits birds having their legs tied. This aligns with an animal fiber criterion.
- The critical criteria banning live export of birds has been added – this aligns with an animal fiber criterion.

- **Handling and transport managed by the organization**

- The criterion that requires birds to be given feed and water if the loading, transport and unloading time exceeds eight hours has been revised to limit transport to four hours, counting from the time the truck leaves the certified site until birds are unloaded. Performance determination notes that this is not applicable to the transport of newly hatched ducklings and goslings.

- **Euthanasia and on-farm slaughter**

- In response to reviewer feedback on the use of cervical dislocation, new criteria around the maximum weight of birds that can be euthanized by this method have been added.
- The signs of death that must be observed before euthanized animals are moved or disposed of have also been added.

- **Slaughter**

- A requirement for slaughter sites to have documented standard operating procedures has been added.
- A new major-level criterion for there to be a person responsible for animal welfare has been added. Performance determination adds the detail that there must be someone who fulfills this role on-site whenever birds are being slaughtered.
- A new requirement has been added that there is both primary and reserve suitable equipment available for slaughter.
- Criteria around the use of water bath stunning that was only in the user manual for RDS has been added – along with a leadership/recommended criterion that this method is not used (in recognition of the concerns about inverting live birds that are associated with this method).

## **Human Rights and Livelihoods**

The Human Rights and Livelihoods section included within the unified standard drafts (1 and 2), aims to apply a systems and risk-based approach that aligns with OECD recommendations for supply chain due diligence. Some of the criteria are similar to those within the Responsible Animal Fiber standards, while other criteria focus more on the implementation of systems than the RAF standards. The criteria within the drafts are applicable to tier 4/raw material/first production levels across each fiber and material category, with some specific conformance threshold differences to allow for relevance and accessibility to certified sites in different contexts.

Between Draft 1 and Draft 2, we have focused on increasing the clarity of the criteria as well as the applicability to smaller organizations and those that are operating as part of a group. A criteria overview and purpose table have been added to the Annexes to give an understanding of the context and intention behind each criteria category.



Some of the criteria have been combined to show the steps between policy and procedure creation, risk assessment stages, and proof of implementation. There have also been some adjustments to the performance determination requirements to allow smaller organizations more informality within their systems and approach.

Adjustments were also made to some levels of conformity, including where some of the most serious labor rights harms are identified without remediation plans in place, the level of conformity can be raised to critical.

Performance determination in the Human Rights section includes the applicability of criteria related to the size of the organization. Proposed definitions for small, medium, and large organizations are included with the standard content for review and feedback.

## **Facility Section**

This paper focuses on the major changes that were made from Draft 1 moving towards Draft 2. The other criteria not summarized below and related to chemical management, waste management, water use and discharge, air emissions, and energy use of this section remain unchanged and are applicable to animal materials at the facility level.

### **Chemical management and restrictions**

One addition in this sub-section related to animal materials is the introduction of a new leadership level/recommended chemical restriction requirement that is applicable to all types of animal fibers. The criterion is about the presence of ectoparasiticide concentration on raw fiber prior to scouring. The criterion provides a list of restricted chemicals along with the permissible limit values.

In the performance determination column, we have given options through which testing is not required. The criteria and the performance determination are adapted from “EU- Ecolabel for textile products.”

### **Water use and discharge**

In this sub-section, we have clarified a particular criterion on effluent discharge by ensuring off-site discharging facilities are exempted from meeting requirements outside of legal parameters. We have also clarified limit values for COD discharge from wool scouring in the performance determination. We also do provide guidance in the performance determination for facilities to adopt guidelines that are planned to be released by ZDHC on wool that would include requirements related to wastewater discharge.

Additionally, we have introduced a new leadership level (recommended) criterion focusing on raw animal fiber scouring by asking the scouring facilities to recover value from the by-products generated during the wool scouring process. Grease, suint, or sludge recovered should be managed with at least one of the options described in the criterion to recover value. Note that this criterion is linked to the new testing criteria as mentioned in the chemical management and restrictions sub-section and that the ZDHC Wool guidelines that focus on effluent discharge from wool scouring are scheduled to be released by August 2024.

## **Group Certification**

Group Certification requirements are the same as they are for RAF and are summarized below.

Group Certification is a mechanism under which groups of farmers can be managed and audited as a collective. Each group is managed by a legal entity, which is the certified organization. This organization puts in place an Internal Control System (ICS) to manage and carry out annual

internal inspections of all its group members. Annual third-party auditing of the ICS and a sampling of group members is conducted according to a risk assessment protocol and the overall size of the group.

The Group Certification approach allows for improved efficiency in meeting and auditing standard requirements. The most common form of Group Certification is the Farm Group model, where all members of a group must comply with all applicable standard requirements and maintain all records and plans in the same way as farmers that are individually certified. There are no constraints on size or type of farming operation, but group members are either all in the same country or all in the EU.

An additional Group Certification option exists, but only for farmers who meet criteria relating to economic and technical constraints. This is known as Communal Farmer Group certification. As with the Farm Group model all standard criteria are applicable to all members, but the expectation for records, plans and audit practices is different. For Communal Farmer Groups, plans and records that are representative of all members are created by the ICS at the group level rather than at the individual farmer level, and during audits more emphasis is placed on animal welfare outcomes as a measure of whether good practices are in place.

## **Monitoring, Evaluation, and Learning (MEL) Indicators**

Through our Climate+ strategy, we have set out to guide the global textile industry towards achieving a 45% reduction in greenhouse gas emissions within raw materials production by 2030. To get there, our focus is holistic and interconnected with accelerating the adoption of practices that improve the state of our water, soil health, and biodiversity. To facilitate this, Textile Exchange's organization-wide Impact Monitoring, Evaluation, and Learning (MEL) Framework is being built to include indicators linked to our Climate+ goal to monitor the implementation and performance of interventions to ensure their effectiveness as well as assess their scale and reach.

In the case of the unified standard development, the original outcomes outlined in the Responsible Animal Fiber (RAF) Framework Theory of Change still hold true. The RAF standards were designed to recognize and reward farmers who meet good practice requirements for animal welfare, land management, and social areas. Certification to the standards allows market access to international buyers who have expectations for raw material production across the key topics listed above. In addition to independent evaluation of conformance-based criteria required for certification, MEL indicators in the unified standard are designed to monitor interventions related to the impact that the standard is working towards.

In this regard, MEL indicators are collected as part of auditing and certification to the standard to tell whether the implementation of practices are moving in the direction of desired outcomes. At the program-wide scale (e.g., where data is collected from all certified sites/certified organizations), MEL indicators within the standard could include metrics like the amount of land under certification, the extent of implementation of certain practices, and possible reductions in chemical use over time.

Data contributing to unified standard MEL indicators will largely be captured through the use of the Farm Questionnaire which is currently being updated from RAF to include other raw materials in the standard scope. The Farm Questionnaire is also being re-assessed for the questions/data requested in terms of relevance and detail to the Climate+ direction in the new standard system. For Draft 2, a criterion is included requiring that the Farm Questionnaire be completed by the organization as part of the audit process.

Standard criteria that relate to verification of information collected in the farm questionnaire are tagged as "MEL Indicator." Additional criteria that include a measurement component and can be

used to monitor the effectiveness of the standard over time are also tagged as MEL indicators. In both cases, this does not mean new criteria have been added, but rather that “MEL Indicator” provides visibility on information as part of the standard that may be used in monitoring and evaluation.

Broader system information to connect different monitoring areas could include the number of certified sites, volume of certified material, market share of certified materials, and non-conformities issued, for example.

As part of the MEL Framework, the unified standard will also feature monitoring on a voluntary basis of a smaller representative sample of certified sites to collect more detailed metrics. The purpose of these detailed assessments is to track the progress of the standard in relation to delivering the intended impacts as well as to gain a deeper understanding of the production context to inform future standard developments. In a broader context than standards, this information will provide insight into support and capacity-building activities.

## Recognition

The unified standard scope includes proposed raw materials that we have not previously covered at the tier 4 production level in our current standards. When we look at new raw materials, our goal is to first consider opportunities for developing recognition partnerships.

Recognition in the unified standard represents forming a partnership to collaborate on standard systems in an effort to combine forces, reduce redundancy, and work towards positive impacts faster, and together.

A key reason for a partnership-first approach is to leverage sustainability standards and certification as a tool that incentivizes practices on the ground that drive outcomes in a desired direction. Alternatively, adding to the proliferation of standards, audits, and certificates in the marketplace is counter to driving impacts.

We are looking at a wide range of raw materials as well as impact areas (e.g., human rights & livelihoods) to recognize verification systems, meaning the recognition framework will include different models. The recognition model will depend on the material and the peer organization as an effort to be adaptable to meet different needs based on areas of alignment and opportunities for growth.

Cashmere is a candidate raw material for recognition. We consider cashmere to be a strategic fiber to include in our future standard system in alignment with our Climate+ goal, but we also acknowledge there are peer organizations that have already developed expertise and invested in standards for this space. The recognition model for cashmere is not yet defined, but options in the draft framework include:

**Growth partnerships:** a partnership model is formed between our organizations to collaborate on growth areas committed to the Climate+ goal and targets;

**Specified recognition:** verification evidence from recognized systems is accepted for the specified impact criteria in place of the applicable criteria being evaluated for the unified standard;

**Full recognition:** materials from recognized standards are eligible to enter the unified standard system at certified sites.

In all models, recognition partnerships include a commitment to shared measurement of impact areas, participation in aligned standard system tools (e.g., Trackit), and an opportunity to create a unified platform across standard users and brands to engage with.

The draft recognition framework will be available for review and circulated to stakeholders when the draft document is ready.