

# Responsible Wool Standard and Responsible Mohair Standard Feedback Summary

*Prepared March 2, 2020*

This document has been prepared to provide a summary of the comments received during the revision period of the Responsible Wool Standard and the draft Responsible Mohair Standard from June 2019 – February 2020. The document includes a summary of all comments received - related to the revision - the general response to the feedback, and how the issues were addressed. A full list of all comments received is available upon request.

## Combined Revision Feedback Period:

April 1 – May 3, 2019

### 1. Participation

Responsible Wool Standard:

In total, 31 stakeholders participated in the Combined Revision Feedback Period. These comments came mostly from Brands and Retailers, and raw material producers.

Total number of stakeholders:

- Brands/Retailers: 12
- Supply Chain: 5
- Raw Material Producers: 5
- Professional Services: 6
- Civil Society: 3

The combined feedback period spanned over 11 months. The different feedback periods ran as follows: Initial Feedback Period from April 1 – May 3, 2019, International Working Group Feedback from June 1 – November 6, 2019, Public Feedback Period from November 6, 2019 – January 8, 2020, and the Final International Working Group Feedback Period from January 30 – February 13

Stakeholders from the following regions participated: Australia, South Africa, South America, Europe, and North America.

Responsible Mohair Standard

In total, 13 stakeholders participated in the Public Stakeholder Consultation. These comments came mostly from Brands and Retailers, Certification Bodies & Standard (Professional Services), and Supply Chain users of the Standard.

Total number of stakeholders:

- Brands/Retailers: 3
- Supply Chain: 2
- Raw Material Producers: 3



- Professional Services: 3
- Civil Society: 2

Stakeholders from the following regions participated: Europe, North America, South Africa, New Zealand. In addition to feedback submitted through the website, feedback was provided through phone calls with stakeholders from each of the categories.

Comment on stakeholder categories: As the consultation is concerned with the farm level requirements it is appropriate that the majority of the feedback was from the raw material producers and brands and retailers. The supply chain stakeholders are not impacted directly by this revision as the requirements for the supply chain are set out in the Content Claim Standard.

Comment on geographical representation: For both key stakeholder categories, the input accurately reflects the geographical distribution of the stakeholders.

## 2. Summary of Comments Received During the Public Stakeholder Consultation

An overview of the comments received during the Public Stakeholder Consultation in addition to feedback received prior to this is provided below. The first section focuses on feedback on specific requirements. This is followed by general feedback on the standards scope, approach and other topics.

### **Nutrition**

#### Provision of feed (RMS)

- Additional requirement needed for goats to ensure access to bulky materials.

#### Body Condition Scoring

- Comments received regarding methods, record keeping and applicability for goats.

#### Deprivation periods

- Comments received suggesting extending the time allowance to 36 hours.
- Comments received suggesting reducing the time allowance during periods of heat.

#### Emergency provisions

- Clarifications sought on definition of risk. Request to change language from 'dispose' to euthanize.

### **Living Environment**

#### Flooring

- Suggestion that slatted flooring is addressed.
- Requirements for bedding needs to be developed

#### Space allowance

- Requirement for space allowance needs to be developed.

#### Prohibition on close confinement

- Clarification on time required.

#### Lighting

- Proposed new requirement on access to natural light.

#### Enrichment (RMS)

- Request to extend the threshold for applicability to 48 hrs.

#### Access to outdoors

- Clarification on intent needed

#### Shade and shelter

- Add hail

#### Stocking density

- Clarification on measurement needed

## Animal Management

### Inspection

- Request for clarification on frequency.

### Health planning

- Clarification on format of plan

### Treatment of health issues

- Remove 'serious'

### Controlling parasites

- Suggestion to reiterate the need for suitable breeds.
- Remove reference to scab as not applicable to angora goats (RMS only)
- Include requirements for dipping.

### Justification for painful procedures

- Remove tail docking as not relevant to angora goats – add disbudding / dehorning instead (RMS only)
- More clarity / detail is needed on the needs justification.

### Competency and equipment to carry out painful procedures

- More guidance is needed on the Standard Operating Procedures

### Castration and spaying

- A large amount of feedback was received with regards to pain relief. Requests for clearer phrasing around when pain relief is mandatory to ensure that it is clear that it is absolutely mandatory for surgical procedure.
- Need for guidance around availability of suitable pain relief globally.
- Request that surgical castration is prohibited.

### Tail docking (RWS only)

- See point above regarding needs justification.

### Mulesing (RWS only)

- Feedback that steining should be addressed in the standard and that it should be prohibited.

### Fiber removal

- A definition of competent shearer required.
- More clarity around contractor declaration is required.
- Sheared goats should be left with enough hair to maintain thermal comfort
- Definition of severe should be included in the standard (currently in guidance): Greater than 10cm, bleed excessively, result in the removal of a teat, or cause damage to the vulva or prepuce.
- Is exclusion of wool / hair from deceased animals on farm needed?
- Should segregation in communal shearing sheds be addressed?

### Breeding, pregnancy and birthing

- Age of first breeding should be addressed.
- Request that laparoscopic artificial insemination is prohibited.

- Request that electro ejaculation is allowed under veterinarian supervision.
- Suggestion to add requirement regarding the confinement of mother with newborns at least during the night

#### Weaning

- Add reference to fiber intake

#### Euthanasia

- Clarify that fire arm is an acceptable method.
- a. Requirements related to slaughter and euthanasia are very repetitive. What we are checking in the end is how the animal is killed in the farm. I suggest to describe acceptable 'sacrifice methods' while keeping requirements for emergency euthanasia which entail different considerations.
- b. Suggest to avoid denominations such as humane slaughter. Different farmers may have different interpretations of the word humane.

#### Handling and Transport

- Goats shall not be dropped, dragged, lifted or pulled by the fleece, tail, ears, head, or neck or horns.
- Goats should not jump down from a vehicle >1.5 m
- Goats may be caught by the leg (above the hock) or the base of the horn but then need to be handled by supporting the goat by holding two body parts –the base of horn and under chin or open hand around rear end and the other arm around the chest/neck when moved.
- Different age groups should be separated when being transported
- Add time/distance, feed water factors o movement on foot e.g. no more than 15km in a day.
- Contingency plan needs to be made to move goats that become lame or weak by vehicle.
- Goats must be provided with suitable conditions and time to settle before handling after they have been moved.
- Transport guidance: travel time (24 hrs) is too long.
- Vehicle condition: The design should prevent faeces and urine discharging onto other goats
- Fitness for transport: Add time limit (in addition to the distance limit)
- Suggested new section on restraint during transport:
  - Goats may not be kept in restraint for more than 4 hours in any 24 hour period when transported.
  - No wire or twine may be used to tie a goat's legs or feet. (Rope must be used)
  - A goats horns (base not tip) attached by a rope to the side of a vehicle must ensure that the point of attachment to the vehicle must be below the knee level and long enough to allow the goat to lie comfortably.

#### Working animals

- Include requirements for livestock guardian dogs (in addition to herding animals)

## Management and Plans

#### Health and Welfare Plans

- Clarification sought on why mortality records are included.
- Details requested on the expected levels.

## Handling and storage of medicines (and chemicals)

- This area is not adequately addressed in the standard. Include additional points under management, plans and procedures.

## Soil

### Soil Health

- General comment: Standard and guidance is too focused on pasture farming system, not much attention is paid to the semi-desert environment in which a large proportion of the world's Angora goats live.

## Biodiversity

### Management of wildlife when there is conflict with livestock

- The SA Mohair industry through their sustainable guidelines prohibited the use of inappropriate leg-hold traps. The industry funded the replaced all traps with fit for purpose specifically designed leg-hold traps. These traps are the only legal trap allowed for use. These specially designed traps have no teeth, and a gap so that the leg is held and not crushed. The leg hold trap is designed to move in 360 degrees to allow the trapped vermin to turn freely in the trap. The trigger is specific to >2.7kg. The request is these specifically designed traps be allowed as per our current guidelines. Vermin (Jackals and Caracals) are responsible for one of the greatest causes of loss of life and injuries to the Angora goat in South Africa.

## Fertilizers

### Fertilizer management

- Most of the worlds Angora goats live in a semi-arid extensive environment and the RMS land management appears to follow the RWS excessively regarding the use of intensive crops and pasture use which are seldom applicable in a South African semi-desert environment.

### Soil testing

- Are soil measurements recorded within the audit – if so, are they understood what soil health means for each farm

## Pesticides

### Applicability

- Clarify the applicability to particular land classes.

### Parasite control

- The topic of pesticide use to treat ectoparasites should be addressed in the standard.

### Residues

- Suggestion that requirements for the use of dips, pour-on products and washes is included within the standard.

## Land management general

- Add water management requirements to land management module.

## General feedback

The following section provides an overview of general feedback grouped by topic received during the stakeholder consultation period as well as during the operation of the standard.

### Certification procedures

- Feedback regarding the certification approach and procedures has been received. Some examples are provided below. In line with Textile Exchanges new standard setting and assurance procedures these topics are not dealt with by the standard specific International Working Group. Any feedback regarding chain of custody is addressed through the Content Claim Standard revision procedures. Any other certification model or assurance focused feedback is addressed through the Textile Exchange standards scheme governance procedures.
  - Align NC categories with other Textile Exchange standards
  - Consider different chain of custody approaches
  - Develop an approach for transition to certification
  - Consider implementing a fair trade model to distribute premiums to farmers
  - Audits on occasions need to be done without contact or within a minimum period
  - Apply a risk based approach to audit frequency

### Approach of the standard

- As RWS is trying to cover a global wool production that cannot be fully standardized due to farming systems, farm sizes, environment and climate, it is hard to be precise. But nevertheless the standard has a great potential to be truly responsible by following the five freedoms more thoroughly in upcoming revision.
- This standard paired with guidelines for farmers on best practices and best available techniques, will be a good tool to ensure wellbeing of sheep.
- The possibilities with this standard could be missed if it does not dare to challenge the shape of the industry today.
- Since the Responsible Mohair Standard (RMS) is intended as a global standard it will have to take cognizance and provide for the differences between least developed (e.g. Lesotho the second largest producer of greasy hair) and developed countries (e.g. USA, Australia & New Zealand) to prevent that the developing countries are automatically disqualified. A possible solution to this could be to grade the standard along different tiers. Although the RMS is intended as a voluntary standard and compliance with country specific requirements is alluded to under the “intended scope section” (pg. 4) the country specific legalities should not omit any producer from being given a fair opportunity to apply for the standard.

### Scope: Farming system

- Land management requirements do not work well for nomadic / common land grazing farming systems. Consider how scope could be extended / requirements could be adapted.

- Many countries including Lesotho (2nd largest mohair producer globally) have a combination of these feeding systems and/or have national rangeland systems. I am concerned because without this inclusion, smallholder farmers of Lesotho will not be able to attain responsible mohair certification.
- Would it not be better to allow nomadic herds into the standard, in the same way that small scale farms are included in TDS?

Scope: Live shipping

- A number of comments regarding the issue of live shipping and why it is outside of the scope of the standard.

Scope: Shearling

- The topic of RWS certified shearling has been raised a number of times. The CCS can be used for other co-products (e.g. grease) but in order for shearling to be certified the slaughter would also need to be certified.

Scope: Social issues

- The topic of social issues has been raised a number of times since the release of the RWS as well as during the feedback period. Suggestions made to include a social module.

Scope: environmental management

- Add chemical and environmental requirements to the supply chain.

Labelling and Logo Use

- Feedback received that the 5% content threshold is too low.