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RECYCLED DOWN

A sourcing best practise guideline for
brands, processors and suppliers

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For brands that consider using recycled down, and intend to make any kind of content claim, there exists a need to obtain objective evidence to back such claims. Without means of verification, claims can be easily challenged.

According to statements from brands themselves, the most credible way of getting objective evidence in the case of recycled material, is via detailed insight into the origin and processing of the material, often practiced via a neutral third party certification (cf. Chapter 5 below).

The method of traceability may vary depending on the type of system that is used.

- Some systems are called “chain of custody” and identify the product as recycled from the source, and then follow that material as it moves through production and into the final product. When chain of custody is used, the final product has been verified to contain “recycled material”.
- True traceability is built onto the foundation of chain of custody, and when it is used, the information about some or all of the supply chain (names and locations of suppliers) may be passed onto the final product as well.

From the animal welfare point of view, guaranteeing at least the chain of custody, or alternatively even more stringent full traceability, implies:

- A guarantee (or a close-as possible equivalent) that no virgin down enters the production cycle at any one point of time, now as well as in the future.
- The ability to completely segregate virgin and recycled down in finished products, label them as such, and allow the consumer to identify products accordingly.

From an environmental management perspective, implementing traceability mechanisms allows for more stringent adherence to environmental standards at the different stages of the supply chain.

This could cover specifically aspects such as:

- Compliance with local, as well as REACH or US EPA legislation
- Best practice implementation in terms of
 - water and energy usage,
 - waste water management,
 - chemical management,
 - textile and down waste management.

This document covers the following areas:

- Supply chain structure and terminology with regards to couché/recycled down,
- Systematic traceability for recycled down,
- Voluntary labeling for systematic traceability,
- Environmental & health safety: explanation of best practice approach,
- Applicable Legislation: excerpts of most relevant applicable law.

2. INTRODUCTION

These guidelines apply to recycled down only. The intent is to create guidelines as to what the aspirational best practices of the industry are. Within this realm, the current state-of-affairs may still differ from the aspirational vision. Therefore, this document outlines the goal towards which the industry overall is working.

This best practice document covers in its scope the full depth of the down's 'second life' as illustrated in Figure 1 , Chapter 3 below (cf. label: "2nd life: Recycling Supply Chain").

The document is intended as a supporting reference document for all members of the supply chain – producers, agents, suppliers, brands – and aims at creating a common understanding of:

- Inherent challenges that exist, and need addressing, as well as
- Aspirational and/or recognised best practice approaches.

Broadly, this document covers the following areas:

- Supply chain structure and terminology with regards to couché/recycled down,
- Systematic traceability for recycled down,
- Voluntary labeling for systematic traceability,
- Environmental & health safety: best practice approach,
- Applicable Legislation: excerpts of most relevant applicable law.

The following aspects are currently and explicitly beyond the scope of this document:

- Comprehensive coverage of Best Available Techniques/Technologies at every stage of sourcing, processing, and trading of couché resp. recycled down.
- A comprehensive coverage of all legislation that applies to the sourcing, processing, trading (import, export) of couché resp. recycled down.
- In depth coverage and comparison of currently available 3rd party standards.

Important Note for the Reader:

This document is a 'living document'. It is a representation of the current knowledge at the time of writing.

We therefore pro-actively invite input, feedback, and improvement suggestions from experts so as to keep readers up to date with the latest findings and information.

The document will be re-disseminated following relevant updates.

3. OVERVIEW & STATUS QUO

The supply chain of recycled down

The full depth of the life / production cycle of recycled down looks as follows:

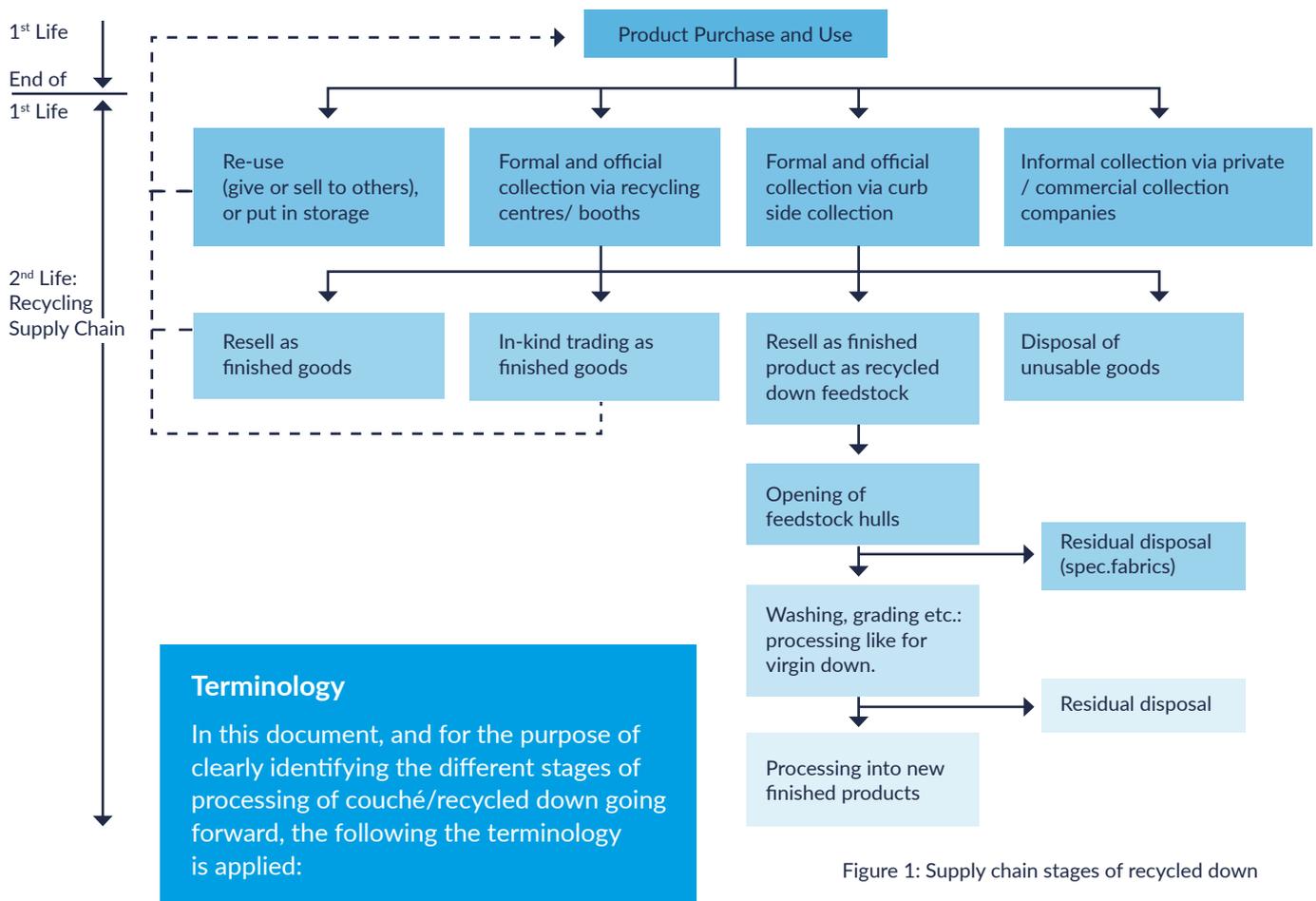


Figure 1: Supply chain stages of recycled down

Stage 1:

Used Material

Equivalent to finished product in its end-of-life stage.

Collected by collectors (formal or informal collector channel).

This is material that at its origin contained virgin or recycled material.

Stage 2:

Original Couché = Raw Material

Equivalent to when the finished products of Stage 1 are being opened, and the contained down extracted.

The material does not contain any fresh (virgin) down.

Stage 3:

Couché := Recycled Down Source Material

Washed to legal Health & Safety requirements, so as to allow for potential blending with virgin material.

Left alone, the material does however not contain any fresh (virgin) down.

Stage 4:

Recycled Down = Completed Reprocessed and Fully Washed Recycled Down Material

Complies with the highest possible Health & Safety criteria. Processed into different fill power grades, and ready to use in consumer products that wish to use the 'recycled' credentials.

Background

For brands that consider using recycled down and intend to make any kind of content claim, there exists a need to obtain objective evidence to back such claims. Without means of verification, such claims can easily be challenged. This is a particularly sensitive area for US-based brands due to the legislative environment in place, but also widely applies to consumer-labelling legislation in place across different geographies.

The need also arises for EU brands that either trade in the US or that wish to communicate pro-actively about their use of recycled down as filling material in their finished products.

According to statements from brands themselves, the possibly most straight forward and credible way of getting objective evidence in the case of recycled material, is via detailed insight into the origin and processing of the material, often practiced via a neutral third-party certification (cf Chapter 5 below).

For this type of certification, the Certification Body has to visit the location where the original couché (pillows, duvets) is processed. The Certification Body is also required to look at some form of documentation, such as receipts and shipping documents, that will substantiate the claim that the raw material originated in fact from used finished products.

Audits normally contend with such information provided by the facility that extracts the down from original couché. However, the collector will have to be able to prove through documentary evidence that its sources are genuine. The Certification Body will make occasional, and typically unannounced, spot checks to verify this.

The method of traceability may vary depending on the type of system that is used.

- Some systems are called “chain of custody” and identify the product as recycled from the source, and then follow that material as it moves through production and into the final product. When chain of custody is used, the final product has been verified to contain “recycled material”.
- True traceability is built onto the foundation of chain of custody, and when it is used, the information about some or all of the supply chain (names and locations of suppliers) may be passed to the final product as well.

From the animal welfare point of view, guaranteeing at least the chain of custody, or alternatively an even more stringent full traceability, implies:

- A guarantee (or a close-as possible equivalent) that no virgin down enters the production cycle at any one point of time, now as well as in the future.
- The ability to completely segregate virgin and recycled down in finished products, label them as such, and allow the consumer to identify products accordingly.

From an environmental management perspective, implementing traceability mechanisms allows to guarantee environmental standards at the different stages of the supply chain. This could cover specifically aspects such as:

- Compliance with local, as well as REACH or US EPA legislation
- Best practice implementation in terms of
 - water and energy usage,
 - waste water management,
 - chemical management,
 - textile and down waste management.

LEAD QUESTION:

What is the fundamental reason as to why we would want to have full chain of custody (traceability) of recycled material right through to where it was collected?

The primary purpose in using traceability tools to address recycled down is to ensure that the down

- meets a recognized definition of “*recycled material*”, hence provides verification of the collector’s claims which will assure to all downstream entities (buyers or brands) that the products were indeed recycled and do not contain virgin down
- can be categorised as either “*post-consumer*”, or where and if applicable, as “*pre-consumer*”.
- can be categorised in terms of recycling channel, particularly also in terms of geographical provenance (country of origin identification).

There are additional benefits to using traceability, such as identifying and addressing issues in the sourcing process that may have previously been unknown or ignored, such as, labour or environmental impacts, or quality aspects amongst others.

Lastly, if the brand and/or the supplying recycler is seeking third party certification to an established standard, the collector’s business may need to be visited in order to verify the nature of their business.

Long-Term Vision: Enabling Factors to Close the Loop

There is an increasing use of certified virgin down in fashion, textiles as well as bedding. The purpose of such certification is to ensure animal welfare on the one hand, and the implementation of stringent traceability and transparency mechanisms throughout the supply chain on the other.

In a similar vain, implementing strict traceability and transparency mechanisms into the recycled down supply chain, serves the added purpose of it consequently complying with the recognised definition of ‘recycled material’.

The long-term vision for the use of recycled down in down products is based on the combination of the two above mentioned aspects:

- The use of certified virgin down in the down’s first life stage, and
- The maintenance of such down’s integrity during its life stages beyond the first (i.e. after its first ‘end of life’).

Traceability Requirements

The following systematic traceability related requirements were identified by stakeholders as being of relevance:

- Point of origin identification: Identification of recycled product acquisition (collection) point.
- Point of processing identification: Identification of individual processing contractors/units within the supply chain.
- Product identification and labelling: Identification of a product as being made with recycled down, and appropriate labelling.
- Thorough chain of custody at individual way points/units: The chain of custody allows the forward (as well as if necessary: backward) tracking of recycled down as well as the resulting manufactured goods.
- Systemic coherence of chain of custody way-points: all the above points together offer a systemic view and allow a neutral third-party audit if and when required.

Best Practice Approaches

The three main aspects that identify stakeholder's needs with regards to traceability/transparency practices of recycled down are outlined in Section 'Traceability Requirements' above.

These requirements are hereafter explained in further detail:

Point of Origin Identification:

Identification of recycled product acquisition/ collection point

- Lead question: *Where does the item (product) to be recycled, originate from?*
- If the item to be recycled belongs to a supply chain which was audited against recognised standards at the time of the item's production: This introduced the opportunity to have knowledge about the production chain and animal welfare conditions in the product's first life.
- Characteristics: formal/ organised vs. informal; central collection point vs. curb side collection.
- Information owner: Recycling collector
- Type of records: log book, receipts, trading accounts, visible on-product traceability certification etc.
- Control mechanism: self-declaration, sporadic formal audits, traceability certification

Point of Processing Identification:

Identification of individual processing contractors/ units within the supply chain.

- Lead questions: *Is the item containing the recycled down, respectively the batch of recycled down once extracted from the former product, untampered with? Has the down been suitably segregated and clearly made identifiable as such? Do the batches of recycled goods (products or down) maintain their integrity? Which units (batches) contain down that has been processed at the previous step?*
- Characteristics: 'old' product vs. extracted down vs. newly manufactured product.
- Information owner: Processing unit at each stage
- Type of records: log book, receipts, trading accounts etc.
- Control mechanism: Mass weight balance, formal audits

Product Identification and Labelling:

Identification of a product as being made with recycled down, appropriate labelling

- Lead questions: *Are the products clearly identified? Can the integrity of the recycled down (origin and quality) within a product be guaranteed? Which units (batches ...) have manufactured products?*
- Characteristics: mixed vs. non-mixed; fill power
- Information owner: brand (incl. warehouse, shipping company etc.)
- Type of records: log book, shipping receipts and records, product labels and codes, sales data and records
- Control Mechanism: Formal audits

Thorough Chain of Custody at Individual Way-Points/Units:

The chain of custody allows the forward (as well as if necessary: backward) tracking of recycled down as well as the resulting manufactured goods.

- Lead questions: *Is the integrity of the recycled down guaranteed along the entire chain of custody? How is the integrity of the batches of down guaranteed?*
- Characteristics: separation/segregation/uniquely identified tracing of recycled down (resp. manufactured products) within a specific entity.
- Information owner: Each individual entity in the supply chain owns their data.
- Type of records: Unit's management systems, batch codes, log books, hand over sheets etc.
- Control Mechanism: Quality control, production management sheets and data, informal audit, formal audit, in-house audit.

Systemic Coherence of Chain of Custody:

All the above points together offer a systemic view and allow a neutral third party audit if and when required.

- Lead question: *What kind of documentation does each entity in the recycled down supply chain maintain with regards to their very own recycled-down related processes?*
- Characteristics: sub-supplier – supplier – brand relationship chain
- Information owner: Each individual entity in the supply chain owns their data.
- Type of records:
 - Commercial documentation (invoices and purchase orders)
 - Shipping documents (bills of landing and packing lists)
 - Stock records (material reception, storage and shipping documents)
 - Processing or mass balance data (relation of inputs to outputs throughout the production process)
 - Documentation related to certification of material, such as scope or transaction certificates (if applicable)
 - Employee training to maintain segregation of recycled down from virgin down (if applicable)
- Control Mechanisms: Formal audits

Side note:

At this very moment the most commonly accepted best practice approach, although not necessarily the only valid approach, is certification to a third party standard. This approach provides a systematic means of ensuring that content claims of recycled down are backed up by objective evidence. These certifications provide chain of custody systems that go from the collector all the way through to the finished goods manufacturer.

Traceability Challenges:

- 1. Potential challenge: Unknown origin of down that is claimed to be post-consumer**
 - Focus: Ensure chain of custody is in place
 - Purpose: Guarantee that products are made exclusively from post-consumer down, and that stringent health and safety standards have been practiced during processing
 - Intent: Ensure that post-consumer down in products can be tracked back to its collection point
 - Currently available best available methods to address this: 3rd party standards cf. Chapter 5
- 2. Potential challenge: Mixing of pre-consumer virgin waste down into down claimed to be post-consumer**
 - Focus: Rigorous exclusion of potential parallel processing at a down processor's facility
 - Purpose: Guarantee that products are made exclusively from post-consumer down
 - Intent: Avoid accidental or purposeful mixing of pre- and post-consumer down
 - Currently available best available methods to address this: 3rd party standards cf. Chapter 5
- 3. Potential Challenge: Origin of pre-certification stock of post-consumer down**
 - Focus & Purpose: Ensure brand policy with regards to the use of pre-certification stocks is clear and transparent on traceability requirements and applied as defined
 - Intent: Not leaving it to the supplier how to deal with uncertified stocks. Avoid them being used in conjunction with certified stocks unless agreed.
 - Currently available best available methods to address this: Contractual agreements & 3rd party standards, cf. Chapter 5.

5.

VOLUNTARY LABELLING FOR TRACEABILITY & ENVIRONMENTAL CREDENTIALS

Whether a brand chooses to use a publicly available 3rd party standard or to design its own, is a strategic decision. This section briefly outlines currently existing standards – 3rd party and proprietary – applicable to recycled down.

3rd Party Standards Applicable to the Couché/Recycled Down Supply Chain:

Backbone Chain-Of-Custody Standards

- **Content Claim Standard¹ :**
“Is a chain of custody standard that provides companies with a tool to verify that one or more specific input materials are in a final product. It requires that each organization along the supply chain take sufficient steps to ensure that the integrity and identity of the input material is preserved. It does not validate any claims about a product beyond the amount of a specific material that is in it. The standard does not limit which type of input material may be claimed, and therefore has broad application potential.”
- **GS1 – Global Traceability Standard, for apparel² :**
Suite of identifiers (such as barcodes and RFID tags) that may be used to link products at every stage of their supply chain to the previous and succeeding stage in the supply chain, as well as link them to the location where the processing is taking place.

Recycled Content or Recycled Product Claim Standards

- **RCS – Recycled Claim Standard³ :**
The RCS is as a chain of custody standard to track recycled raw materials through the supply chain.
- **GRS – Global Recycling Standard⁴ :**
“The GRS provides companies with a tool to ensure the identity of recycled materials throughout the production stages, with additional processing requirements to create a full product standard. It includes strong social and environmental requirements that apply to the entire certified facility. In its latest edition it also includes restrictions on chemicals used in the production of GRS products. The restrictions are based on the assignment of hazard codes, rather than testing against an RSL.”
- **SCS Recycled Content Certification⁵ :**
Evaluates products made from pre-consumer or post-consumer material diverted from the waste stream. Certification measures the percentage of recycled content for the purpose of making an accurate claim in the marketplace.

¹ Content Claim Standard, by Textile Exchange: contentclaim.org

² GS1 for Apparel: <http://www.gs1.org/apparel>

³ Recycled Claim Standard, by Textile Exchange: <http://textileexchange.org/standards-integrity/standards/9609>

⁴ Global Recycling Standard: <http://textileexchange.org/standards-integrity/standards/9614>

⁵ SCS Recycled Content Certification: <https://www.scsglobalservices.com/recycled-content-certification>

Brand Or Supplier Owned In-House Standards

- **NVP Traceability Standard**⁶ by Navarpluma⁷:
Is a privately-owned supply chain audit and chain of custody standard, to which NEOKDUN branded products are subject to. It was originally created by IDFL (International Down and Feather Laboratory). Its purpose is to certify the Navarpluma couché/recycled down supply chain for the purpose of the resulting down being marketed under the NEOKDUN trademark⁸.
This standard is a good example with regards to what the standard is intended to address, and the questions that may arise via the operational implementation limited scope audits⁹.

In-House or 3rd Party Standard?

Whether or not any given standard is worth its salt can always only be decided after detailed scrutiny of the standard's scope and safeguards, required documentation as well as an evaluation of the audit team's or contractor's credentials.

However, the advantage of 3rd party certification over in-house standards typically is:

- That suppliers can more easily use their credentials with a wide range of their customers
- The interests of standard holder, manufacturer and audit experts are kept separate and without mutual link
- That a public standard can widely be adopted by brands and suppliers and therefore create 'economies of scale' for suppliers that decide to invest in being certified.

These attributes are typically much harder to achieve through proprietary in-house standards, albeit of course not impossible.

⁶ NVP Traceability Standard, by Navarpluma: <http://www.neokdun.com/>

⁷ Navarpluma homepage: <http://www.navarpluma.com/>

⁸ 'NEOKDUN Eco Friendly 100% Recycled Down' Trademark: https://tmdb.eu/trademark_registration/trademark_012254512_ohim_neokdun-eco-friendly-100-recycled-down

⁹ Standard coverage: no mixing. Audit scope: functional internal traceability system. The assumption of non-mixing is implicit, but not explicitly entailed in the audit scope. cope as per the latest IDFL certificate posted online dated October 2014: http://www.neokdun.com/wordpress/wp-content/uploads/2014/10/audit_certificate.pdf

6.

ENVIRONMENTAL & HEALTH AND SAFETY CHALLENGES: BEST PRACTICE APPROACH

The processing of down, including couché, follows fundamentally the same approach as any other type of processing. For the purpose of this document, and without going into full detail, we assume that Best Available Techniques is the ultimate aim of all efforts.

Best Available Techniques are in this context define as:

'Means that the operator has to use the very best possible way to protect the environment that can be economically justified' ¹⁰

Derived from the above, Best Available Technology is understood as

"Best available techniques not entailing excessive costs (BATNEEC)." ¹¹

The implementation of BAT and BATNEEC therefore applies to the following areas:

- Disinfection and washing for hygienic purposes.
- Processing of down material
- Waste water
- Chemicals and detergent usage
- Sludge and other material waste
- Tracking and tracing
- Finishing process if applicable (e.g. quick dry, water repellence)
- Worker Health & Safety
- Consumer Health & Safety

In certain areas, the application of BAT/BATNEEC are tightly interlinked with the corporate strategy of the brand marketing the finished goods, and therefore will require a brand to specify the chosen BAT approach with their supplier. Examples of such would be:

- DWR finishing
- Quick dry finishing

In addition to following BAT/BATNEEC, environmental and health and safety achievements may – similar to traceability achievements – be certified via 3rd party standards. While such standards are out of scope for this document, examples of standards that apply partially or wholly to this area are: SCS Biodegradable Standard ¹², Cradle to Cradle ¹³ and others.

¹⁰ Email Siegfried Boehler, Secretary General of the International Down and Feather Bureau (IDFB), to Pamela Ravasio, Head of CSR & Sustainability of the European Outdoor Group (EOG), dated July 6 2015.

¹¹ BS DIN EN12935: 2001: <http://ldgd.kupoo.com/public/upload/media/BS%20EN%2012935-2001.pdf>

¹² Regulation (EC) No 1069/2009: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:300:0001:0033:EN:PDF>

¹³ Regulation (EC) No 1774/2002: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2002R1774:20070724:EN:PDF>

7. CURRENTLY APPLICABLE LEGISLATION

Product (Quality) Labelling

This summary overview of standards is provided by the 'World-wide labelling comparison' created and provided by the International Down and Feather Laboratory (IDFL) ¹⁴.

The same product labelling requirements apply to both virgin as well as recycled down.

According to the International Down and Feather Bureau (IDFB): 'National standards like EN for Europe, standards in USA, in China, Japan, Korea and in other countries rule clearly on labelling, requirements to hygiene, etc.' ¹⁵

This answer leads to the conclusion that there does not exist any labelling or quality standard that provides adequately for couché or recycled down, but that all standards are entirely focused on, and hence intended to apply to, virgin down.

Applicable EU Regulation: Export / Import & Health & Safety Requirements:

The regulation applicable to couché/recycled down is identical to the one applicable to virgin down.

The regulatory framework encompasses the following components:

1. **DIN EN12935: 2001** ¹⁶ – "Feather and down. Hygiene and cleanliness requirements' as minimum standard (cf. Figure 2 and Figure 3)
2. **Regulation (EC) No 1069/2009** ¹⁷ – "laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 ¹⁸ (Animal by-products Regulation)"
 - a. Article 10, Category 3 materials
 - i. Category 3 material shall comprise the following animal by-products: b) carcasses and the following parts originating either

from animals that have been slaughtered in a slaughterhouse and were considered fit for slaughter for human consumption following an ante-mortem inspection or bodies and the following parts of animals from game killed for human consumption in accordance with Community legislation:

1. (v) feathers
3. **Commission (EU) No 142/2011** ¹⁹ – Implementing Regulation (EC) No 1069/2009 and Council Directive 97/78/EC ²⁰
 - a. Article 3, End point in the manufacturing chain for certain derived products:
 - i. "(f) Feathers and down, which fulfill the specific requirements for the end point for those products set out in point C of Chapter VII of Annex XIII" (cf. Annex 2)
 1. C. End point for feathers and down: "Feathers, parts of feathers and down which have been factory-washed and treated with hot steam at 100 °C for at least 30 minutes may be placed on the market without restrictions in accordance with this Regulation."
 - b. Chapter VIII 'Import, Transit and Export', Article 25,
 - i. (1) The importation into and the transit through the Union of the following animal by-products shall be prohibited:
 1. (b) Untreated feathers and parts of feathers and down.
 - c. Row No 9 of Table 2 of Annex XIV ('Importation, Export and Transit: Specific requirements for the importation into and transit through the union of Category 3 Material and derived products for uses in the feed chain other than for pet food or for feed to fur animals') (cf. Figure 4)

¹⁴ Commission (EU) No 142/2011: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:054:0001:0254:EN:PDF>

¹⁵ Council Directive 97/78/EC: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=URISERV:I12059b&from=EN>

¹⁶ BS DIN EN12935: 2001: <http://ldgd.kupoo.com/public/upload/media/BS%20EN%2012935-2001.pdf>

¹⁷ Regulation (EC) No 1069/2009: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:300:0001:0033:EN:PDF>

¹⁸ Regulation (EC) No 1774/2002: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2002R1774:20070724:EN:PDF>

¹⁹ Commission (EU) No 142/2011: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:054:0001:0254:EN:PDF>

²⁰ Council Directive 97/78/EC: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=URISERV:I12059b&from=EN>

EHC ('veterinary') Certificates: Legal Provisions for Exporting Couché or Recycled Down Outside of the European Union

Products of animal origin intended for exportation outside of the European Union, such as China, require an Export Health Certificate (EHC; also called a 'veterinary certificate').

The purpose of such certificate is

- To guarantee that the meat of the slaughtered animal is fit for human consumption, as well as,
- To guarantee that any by- and side-products – of which down is one – do exclude any kind of potential health & safety risk (e.g. avian influenza etc.)

The applicable norm/law for this purpose is Regulation (EC) No 1069/2009, and in principle applies exclusively to the food supply chain and its by/side products.

Until recently the situation was as follows:

- Couché or recycled down is of animal origin, albeit a not 'recent' side product of the meat supply chain.
- For export, and using the customs classification of 'down and feather' this therefore results in the requirement for an EHC ('veterinary') certificate.
- Habitual practice by the national enforcement authorities for Regulation (EC) No 1069/2009 (e.g. the Ministries of Agriculture) was to simply provide signed certificate. This under the assumption that given that this down material does in its current incarnation not originate from a food supply chain source, it is safe in terms of Health & Safety.

Recent developments:

- The French authorities have since recently stopped issuing any EHC (veterinary) certificates for couché/recycled down. Their rationale: the material does in its current incarnation not originate from the food supply chain, and therefore lacks traceability to ensure its Health & Safety credentials.
- The consequence of which is that French suppliers cannot directly export outside the EU anymore.
- Other EU countries continue to provide EHC (veterinary) certificate however at this stage.

- The matter has also been discussed with the EU Commission. The Directorate General for Agriculture and Rural Development has rejected any responsibility with regards to couché/recycled down, but confirms that indeed EHC (veterinary) certificates only apply to by/side products that originate from the slaughter house.

Going forward:

- The difference in handling couché/recycled down for export poses a risk to the EU's trade relations with overseas countries. The validity of EHC certificates could be put into question as a consequence of the dominant practice surrounding couché/recycled down.
- The initial thought by the French National Syndicate for Feather and Down is the use of a customs code that does not refer to down and feather, or an animal by/side product, to be used for couché/recycled down specifically, so as to avoid the necessity of a certificate at all.
- There is no solution in sight at the time of writing.

For brands that consider the use of recycled down and intend to make any kind of content claim, there exists a need to obtain objective evidence to back such claims. Without means of verification, such claims can be easily challenged.

The method of traceability may vary from 'chain of custody' to 'full-depth traceability' depending on the type of system that is used and the requirements by brands and its supply chain partners.

From the animal welfare point of view, guaranteeing at least the chain of custody, or alternatively even more stringent full traceability, implies

- A guarantee that no virgin down enters the production cycle at any one point of time, now as well as in the future.
- The ability to completely segregate virgin and recycled down in finished products, label them as such, and allow the consumer to identify products accordingly.

This document covered the following areas

- Supply chain structure and terminology with regards to couché/recycled down,
- Systematic traceability for the recycled down,
- Voluntary labelling for systematic traceability,
- Environmental & health safety: explanation of best practice approach,
- Applicable legislation: excerpts of most relevant applicable law.

9. ANNEX: FIGURES

Figure 2: EN12935 – Mandatory requirements for finished feather and/or down material

Impurity indicators	European standard referred to	Limits of acceptability
Oxygen index number ^a	EN 1162	less than 20
Oxygen index number ^b	EN 1884 Selective medium and count plate method	
<ul style="list-style-type: none"> • Mesophil aerobic bacteria count • Faecal streptococci count • Sulphite reducing clostridium count • Presence of salmonella 		less than 10 ⁶ CFU/g less than 10 ² CFU/g less than 10 ² CFU/g absent in 20g

^a This oxygen index number is indicative of the cleanliness of the analysed materials and shall be considered as a first level screening and not as a direct indicator of the hygienic state.

If the oxygen index number is below or equal to 20 the filling material is considered as hygienically suitable and no further analysis of the microbiological state is necessary.

If the oxygen index number is between 20 and 50 the required limits of acceptability of the microbiological state are to be met.

If the oxygen index number is above 50 the filling material is not considered to be hygienically suitable and it has to be reprocessed.

^b In case any of the limits for microbiological state is exceeded, the filling material cannot be considered hygienically suitable.

Figure 3: EN12935 – Optional impurity indicators and recommended values for finished feather and/or down materials

Impurity indicators	European standard referred to	Recommended values
Oil and fat content	EN 1163	0.5% to 2.0%
Turbidity	EN 1164	min 300 mm
pH	EN 1413	6.6 to 8.0

Figure 4: Commission (EU) No 142/2011 – Implementing Regulation (EC) No 1069/2009 and Council Directive 97/78/EC, Row No 9 of Table 2 of Annex XIV ('Importation, Export and Transit: Specific requirements for the importation into and transit through the union of Category 3 Material and derived products for uses in the feed chain other than for pet food or for feed to fur animals')

9	Treated feathers, parts of feathers and down	Category 3 materials referred to in Article 10 (b) (v) and (H) and (n).	The treated feathers or parts of feathers shall comply with the requirements set out in Section 6.	Any third country.	For imports of treated feathers, parts of feather and down, no health certificate is required.
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10. EDITORIAL INFORMATION

About this report

This document was originally written in 2015, when recycled down was for the first time significantly mentioned as potentially suitable alternative to virgin down for outdoor application. It lay however dormant for the best part of 2 years.

The very recently renewed interest in the use of recycled materials however, has encouraged us to finally make this document available in a public format.

The content presented is focused on discussing the chain of custody and transparency that is needed to leverage to potential of this material both for animal welfare purposes as well as to work towards 'closed loop' solutions.

It is important to state however, that this present document does intentionally not include a scientific and nuanced discussion of environmental and/or social benefits or challenges comparing virgin vs recycled down. The principle reasons for this decision is the lack of available and peer reviewed data, as well as methodological questions related to LCA framing.

More relevant for the practitioner though, the document does include a short outline of the most important legal/regulatory aspects relevant to use and processing of recycled down in end-consumer goods.

About the European Outdoor Group (EOG)

The European Outdoor Group is the membership association of internationally operating outdoor brands, retailers and technology brands, in Europe.

The association exists to represent the common interests of the European outdoor industry, and was founded in 2003 by 19 of the world's largest outdoor companies, who recognised the need for a cohesive, cross border approach to representation of the outdoor sector. Our membership consists – as at writing – of more than 100 corporate members (brands, retailers, technology brands and national associations).

The origins of the outdoor industry lie in the enthusiasm and value sets of individual entrepreneurs who have challenged themselves in the outdoors and in the development of their business.

The EOG strongly believes that increased participation in outdoor sports will benefit both individuals and society as a whole. We share a vision to encourage people of all ages and in all locations to be active outdoors. As an industry we are also committed to maintaining 'our roots': the natural environment and society we draw our inspiration from.

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