Responsible Wool Standard 2.0 Revision and Responsible Mohair Standard 1.0 IWG Call

Date: 10th September, 2019

Topic(s):
- Social Impact and Chemical Input

Attendees

From Textile Exchange: Hanna Denes, Callie Weldon, Trini Gartner, Nicole Lambert

- Felicity Lammas - ASOS
- Haldi Kranich Wood – British Wool
- Ignacio Abella - Uruguayan Wool Secretariat (SUL)
- Karin Wiske - Varner
- Nathalie Borderie - Caroll
- Lindsay Humphreys – Mohair South Africa
- Megan Meiklejohn – Eileen Fisher
- Ayesha Fitzwilliams – Fat Face
- Megan Anderson
- Mandy Lucas – Farm Animal Welfare Consulting
- Marco Coetzee
- Michelle Bhattcharyya -
- Ian Wicklen – Merrythought
- Stephanie Hobbs – Fat Face
- Tom Aubrey – Burlington Fabrics

Call Notes

News and Updates

For RWS CBs, a reminder that we do not accept steining as non-mulesed. Any recognition of alternative methods of breech modification will be discussed as part of the next RWS revision. Until that time, we cannot consider steined wool as ‘non-mulesed’ so it would not be possible for the wool to be RWS certified.
Schedule: September 17th call will now be 2 hours

---

# RWS and RMS Revision Workplan*

<table>
<thead>
<tr>
<th>Date</th>
<th>Call Number</th>
<th>Topic</th>
</tr>
</thead>
<tbody>
<tr>
<td>July 16, 2019</td>
<td>1</td>
<td>Intro to IWG, Terms of Reference</td>
</tr>
<tr>
<td>July 30, 2019</td>
<td>2</td>
<td>Final Terms of Reference, Certification Procedures, Topics</td>
</tr>
<tr>
<td>August 13, 2019</td>
<td>3</td>
<td>Nutrition, Living environment</td>
</tr>
<tr>
<td>September 10, 2019</td>
<td>4</td>
<td>Chemical management, Social</td>
</tr>
<tr>
<td>September 17, 2019</td>
<td>6</td>
<td>Animal management</td>
</tr>
<tr>
<td>September 24, 2019</td>
<td>7</td>
<td>Handling and transport, Optional slaughter module, M&amp;E</td>
</tr>
<tr>
<td>October 1, 2019</td>
<td>8</td>
<td>Land management</td>
</tr>
<tr>
<td>October 14-25, 2019</td>
<td></td>
<td>Vote on final draft (and in person meeting in Vancouver)</td>
</tr>
<tr>
<td>October 25, 2019</td>
<td></td>
<td>Release for public stakeholder consultation</td>
</tr>
</tbody>
</table>

*subject to change

---

# Nutrition Feedback

**Nutrition: Feedback received**

Provision of feed: Support for new requirement addressing angora goats need for browsing with suggested adjusted wording.

Body Condition Scoring (Record keeping): Support for suggestion to remove record keeping requirement unless it is to return animals to good health (new addition in red) "AW2.4.2 If there is evidence of BCS below 2, appropriate action shall be taken to return the animals to good health. These actions should be recorded.”

Body Condition Scoring (angora goats): applicability. Further clarification is needed regarding the applicability for angora goats – review on 17th call.
**Nutrition: Feedback received**

Deprivation periods:
- No support for extending the deprivation periods. Possibly look to set different deprivation periods for feed and water.
- Suggestion to amend AW 2.6.3 and AW1.7.3 (sub requirement setting time limit for pregnant and lactating ewes) recommend amending to “Late pregnancy” (e.g. last trimester).
- Feedback received on:
  - “Sheep held in sheds or yards for management practices (such as shearing) shall be monitored for signs of distress during time held off feed and water.”
  - Proposal to add explicit requirement for action to be taken if distress is noted:
  - “Sheep held in sheds or yards for management practices (such as shearing) shall be monitored for signs of distress during time held off feed and water, with appropriate action taken (e.g. re-introduction of water or priority shearing) should signs be observed.”
  - In the User Manual this could be expanded to include examples of scenarios, such as evidence of heat stress and the need to re-introduce water if distress is noted.

**Nutrition: Feedback received**

Growth promoters
- Feedback received in favor of prohibiting all growth promoters.
- Feedback recommending that as this is not a food safety standard this should not be considered in the RWS at the moment. If and when it is considered for inclusion it should be alongside other requirements on other antimicrobials in relation to antimicrobial resistance.
- Further input from IWG is welcome on this topic.

**Living Environment Feedback**

**Living Environment: Feedback received**

Cleanliness and air quality feedback:
- Agree to splitting of requirements.
- With respect to the new requirement, this perhaps need qualifying as the aim of drainage is to provide a dry lying area.
- Recommended wording “Buildings shall be constructed to provide sufficient drainage to allow for a dry lying area.”

Applicability of housing requirements
- Recommendation to change from the definition in RWS v1: “Applicable only to sheep that are housed during cold weather seasons” to making the indoor environment applicable whenever animals are housed and make it not applicable if housed temporarily (1-2 days) due to extreme weather events or routine handling events, e.g. shearing.

Space allowances:
- Recommendation that specific stocking density/space allowances are avoided as there are so many variables across the world. Could require that local legislation or welfare codes are complied with where applicable. (In addition to the outcome focused current wording:
  - AW3.4 Housed sheep shall have pens that provide sufficient freedom of movement and floor space to lie in a normal resting posture.
  - AW3.4.1 Housing space required shall take into account the age, size and class of sheep and environment.


Living Environment: Feedback received

- AW5.4.1 Tethering or use of crates shall only be used for a minimum time to address a special need such as the provision of medical care.
- Suggestion for amended wording: “Confinement in crates or tethering is prohibited unless it is for a minimum time (perhaps a time limit) to address a special need such as the provision of medical care.”
- Suggestion: Amend from “long term” to “routine” or remove the condition altogether and state “Close confinement in crates and tethering are prohibited” “Tethering or use of crates shall only be to address a special need, such as the provision of medical care and shall only be restrained for the minimum time necessary”. In all circumstances animals must be able to exercise daily (i.e., apply to tethering and crating).
- Defining maximum periods is difficult as adoption pens can be used for 1-5 days and have differing levels of restraint/freedom. If an animal has received veterinary care which requires restrict movement post-op, this needs to be accounted for. Instead of setting duration in the standard address by including scenarios in the User Manual.
- Suggestion to add more detailed sub-requirements (example from RSPCA Australia):
  - Tethered animals must be inspected at least twice in each 24 hours to ensure that food and water are available, they haven’t become entangled and the tether is still fitted properly at the head or neck. This should be increased to three times in very hot weather.
  - Clean, fresh, potable water should be available at all times in troughs or heavy containers which are firmly fixed on the perimeter of the tether.
  - Tethered grazing animals should receive supplementary feeding where grazing is not adequate.
  - Animals must be protected from climatic extremes and predators.

Living Environment: Feedback Received

Lighting: Proposed new sub requirement: Goats/Sheep should have access to natural light
- Currently the addition is only a “should” is this intended?
- Should be defined what the normal period of daylight hours entails;
- Suggested wording: Housed sheep shall have access to a lit area, in-line with natural period of daylight hours in their region/season.

Enrichment: Extending the time limit before requiring raised platforms.
- Request for clarification on why extension is needed if goats are rarely housed?
- Feedback that 48hrs would align with the suggested time period for the definition for temporary housing

Access to pasture: moving from scope to requirement
- Proposed requirement: “Sheep must have access to pasture at all times unless emergency or severe weather conditions would otherwise negatively impact on their welfare.”
- This suggested wording doesn’t appear to allow for housing in the non-grazing season as this is neither emergency or severe weather conditions.
- Recommend: Sheep must have access to pasture at all times during the grazing season, unless emergency or severe weather conditions would otherwise negatively impact on their welfare.

Addressing Chemical Impact

Feedback
Feedback

RWS v1. addresses chemical inputs in the Pesticides section of the Land Management module. The requirements are applicable to land classes 1-3 and to the use of pesticides on animals. (see next slide).

The requirements are focused on Integrated Pest Management, monitoring for pests and the choice and application of pesticides.

Feedback received:
- RWS should go further in how chemicals are addressed through additional requirements focused on chemical management practices.
- The RWS should introduce substance restrictions.
- RWS should only focus animal welfare, this is out of scope.

RWS V1 is focused on monitoring for pests and is a management-based approach.

Feedback received: RWS should go further and have additional requirements for how chemicals are addressed and limiting chemicals. However, we also received feedback that RWS should only focus on animal welfare and that this is out of scope.

RWS 1.0 Land Management Module: Pesticides

RWS v1. Land Management Module: Pesticides

The requirements are applicable to land classes 1-3 and to the use of pesticides on animals.

LM4.1 There shall be an Integrated Pest Management (IPM) plan or strategy that is reviewed annually.
   LM4.1.1 The IPM plan or strategy shall be based on the principles of prevention, observation, monitoring and intervention. The plan shall include the recommended thresholds or triggers to use pesticides where these are available.

LM4.2 Farmers shall have a monitoring program for crop, pasture and for parasites.
   LM4.2.1 Decisions to use pesticides shall be based on monitoring and thresholds."

LM4.3 Biological, physical and cultural control methods shall be used over chemical methods if they provide satisfactory control.

LM4.4 Pesticides applied shall be appropriate and as specific to the situation as possible with minimal side effects.

LM4.5 Farmers shall use the minimum amount of pesticides to achieve adequate control of pest burden on their farm.
   LM4.5.1 Prophylactic use of pesticides is prohibited.

LM4.6 Measures shall be in place to limit the impact of pesticide use.
   LM4.6.1 Farmers shall take care to avoid damage to beneficial organisms.
   LM4.6.2 Risks from pesticide application for human and animal health or the environment shall be minimized.
   LM4.6.3 Systems shall be in place to ensure that pesticides reach all targeted areas and to minimize losses to non-target areas or the atmosphere.

LM4.7 Actions shall be taken to avoid pesticide resistance."

LM4.8 Application records shall be kept for all pesticides that have been used.
Nicole from Textile Exchange → There are two ways we can go from here: 1) not make any changes 2) make changes to address chemical use.

First, let’s address why this could be a valuable addition to the standard.

**Why include further criteria on chemical use?**

- Poor chemical management practices can lead to unwanted hazardous exposures to farmers, the animals and the environment.
- The use of very hazardous substances can lead to very serious acute and long-term effects on farmers
  - Example: In the late 1970s, sheep farmers in the UK were under compulsory government orders to treat their animals twice a year with organophosphates to tackle sheep scab. Adequate safety instructions were not given to the farmers, leading to very high exposure to these chemicals and severe neurologic health effects.
- The use of parasite control substances can lead to the development of resistance

**Chemical Management practices**

- Chemical management:
  - Inventory of chemical products present on site, what their hazardous properties are and how these products should be dealt with if an accident occurred (reference and use of MSDS)
  - Practices and procedures that manage how chemicals are stored, handled and disposed of, with the intention to avoid unwanted exposures and accidents.

- Current RWS standard:
  - High level chemical management requirements applicable to pesticide use on land and animals

- What could be improved:
  - The pesticides module could be extended to include more detailed chemical management requirements
    - Include more chemical handling requirements
    - Develop existing requirements to be more specific as to what implementation procedures or practices are expected
  - The user guide could be more detailed

In general, chemical Management Practices are a system which should include which chemicals are present, what their hazardous properties are and how these products should be dealt with if accident occurs (reference and use of MSDS). Also includes practices and procedures for how chemicals are stored, handled, disposed of, with the intention to avoid unwanted exposure and accidents.
RWS 1.0 has a high-level chemical management requirement applicable to pesticide use on land and animals. We did receive feedback that we have additional chemical handling requirements for RWS 2.0. We can add substance restrictions as shown below:

**Suggested additional chemical handling requirements provided in the feedback:**

- LW5.13 Handling of Chemicals
  - LW5.13.1 Chemicals need to be handled, stored and used in a responsible manner as prescribed by the occupational health and safety legislation and the latest regulations supporting this legislation.
  - LW5.13.2: The store should be located above the 50-year flood line
  - LW5.13.3: Only authorized and trained personnel shall have access to keys and the store
  - LW5.13.4: Person responsible for managing pesticide store (literate farmer/ farm worker) must be trained in pesticide handling & understand implications of incorrect handling
  - LW5.13.5: Only plant protection and/or animal health products are allowed in the store – no feedstuffs
  - LW5.13.6: Large containers should not be stored directly on cement floor – place on wooden pallets covered with thick plastic or on plastic pallets
  - LW5.13.7: Products in solid, powder or granular form must be stored above liquid formulations (less damage during accidental leakage)
  - LW5.13.8: All products must be stored in original containers with labels intact
  - LW5.13.9: Keep records away from storage area.

**Substance restrictions**

- Compliance with national legislation and substance restrictions
- Additional restrictions:
  - Refer to WHO Recommended Classification of Pesticides by Hazard and only authorized certain classes
  - Refer to EU REACH directive – ban substances included in the list of substances of very high concern or under restriction
  - Refer to the EU Biocide directive – authorize products included in the authorized substance list

Three options:

1) No changes
2) Extend the chemical management requirements to be more specific
3) Extend the chemical management requirements and add a list of restricted substances

- **Comment in chat:** I understand RWS should include some already existent certificates world known such as OEKO TEX 100 → these are for the product itself, not on the farm level
- **Question in chat:** Chemicals still just pesticides, or extend to herbicides too? → should include anything that would control pests on land or animals.
- **Comment in chat:** Vote for option 3
Comment in chat: Vote for option 1

Social Module – Michelle Bhattacharyya

Who are We?

Michelle Bhattacharyya
Founding Partner

Former Director of Operations at Social Accountability International (SAI) and coordinator of the Global Living Wage Coalition (GLWC).

Jessica Grillo
Founding partner

Former Senior Advisor, Livelihoods at Rainforest Alliance and former Management Committee and Advisory Roundtable member of the Global Living Wage Coalition (GLWC).

Guiding Principles

- Introducing social requirements creates risk if not enforceable
- Burden on farmers should be reasonable - avoiding decertification of farms effecting animal welfare standard
- Social standard shall follow current RWS language and framework
- All requirements are auditable and backed by legal compliance, management systems, and/or remediation
Guiding principles: if we introduce social requirements without being enforceable it creates risk. It also burdens the farmers if it’s not reasonable. We want to avoid decertification of farms effecting the animal welfare standard. Social standard shall follow current RWS language and framework. All requirements should be auditable and backed by legal compliance, management systems, and/or remediation.

Information Sources

A comparative analysis of seven social standards applicable to farming and/or livestock;

ILO recommendations and conventions;

Verité guidance on fair hiring and protection against forced labour and child labor; and

Other UN, bilateral, and non-profit resources, such as the FAO and World Resources Institute (e.g., on FPIC).

For their information sources, the group used a combination of the following: a comparative analysis of seven social standards that are applicable for livestock. ILO conventions, Verité guidance on fair hiring and protection against forced and child labor, other UN, bilateral, and non-profit resources such as FAO and World Resources.
The sheep above are indicative of how heavily weighted the provisions are between human rights and health and safety.
In this slide, it’s not a matter of how many stars are listed for each standard requirement, it is indicative or the rigor of the standard. 1 star=the standard is mentioned 3 star=standard is mentioned and taken to a higher level.
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Protection Equipment</td>
<td>★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
</tr>
<tr>
<td>Evacuation</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
</tr>
<tr>
<td>Negative Environmental impacts for community</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
</tr>
<tr>
<td>First Aid and Medical Care</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
<td>★★ ★★</td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>------------</td>
<td>------------</td>
<td>------------</td>
<td>------------</td>
<td>------------</td>
<td>------------</td>
<td>------------</td>
</tr>
<tr>
<td>Working Hours</td>
<td>★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
<td>★★★</td>
<td>★★★</td>
</tr>
<tr>
<td></td>
<td>MS</td>
<td>LC MS</td>
<td>MS</td>
<td>LC MS</td>
<td>MS</td>
<td>LC MS RS</td>
<td>LC MS RS</td>
</tr>
<tr>
<td>Labor Compensation</td>
<td>★</td>
<td>★★</td>
<td>★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
</tr>
<tr>
<td></td>
<td>MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>MS</td>
<td>LC MS RS</td>
<td>LC MS</td>
</tr>
<tr>
<td>Forced labor and Hiring</td>
<td>★</td>
<td>★</td>
<td>★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
</tr>
<tr>
<td></td>
<td>LC</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS RS</td>
<td>LC MS</td>
</tr>
<tr>
<td>Child Labor</td>
<td>★</td>
<td>★★</td>
<td>★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
</tr>
<tr>
<td></td>
<td>LC</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS RS</td>
<td>LC MS</td>
</tr>
<tr>
<td>Harassment and Abuse</td>
<td>★</td>
<td>★★</td>
<td>★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
</tr>
<tr>
<td></td>
<td>LC</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS RS</td>
<td>LC MS</td>
</tr>
<tr>
<td>Discrimination</td>
<td>★</td>
<td>★★</td>
<td>★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
</tr>
<tr>
<td></td>
<td>LC</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS RS</td>
<td>LC MS</td>
</tr>
<tr>
<td>Freedom of Association and Collective Bargaining</td>
<td>★</td>
<td>★★</td>
<td>★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
</tr>
<tr>
<td></td>
<td>MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS RS</td>
<td>LC MS</td>
</tr>
<tr>
<td>Corruption, Extortion, Bribery of Workers</td>
<td>★★</td>
<td>★★</td>
<td>★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
<td>★★</td>
</tr>
<tr>
<td></td>
<td>MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS</td>
<td>LC MS RS</td>
<td>LC MS</td>
</tr>
</tbody>
</table>
### Social Standard Comparison - Cross-cutting

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Grievance Mechanisms</td>
<td>MS RS</td>
<td>MS RS</td>
<td>MS RS</td>
<td>MS RS</td>
<td>MS RS</td>
<td>MS RS</td>
<td>MS RS</td>
</tr>
<tr>
<td>Legal Compliance (governing laws (ILO))</td>
<td>LC</td>
<td>LC</td>
<td>LC</td>
<td>LC</td>
<td>LC</td>
<td>LC</td>
<td>LC</td>
</tr>
<tr>
<td>Continuous Improvement</td>
<td>MS</td>
<td>LC MS</td>
<td>MS RS</td>
<td>MS RS</td>
<td>MS RS</td>
<td>MS RS</td>
<td>MS RS</td>
</tr>
<tr>
<td>Sub-contractors</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
</tr>
<tr>
<td>Management Systems</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
<td>MS</td>
</tr>
</tbody>
</table>

---

### Initial Discussion Topics

- Distinguishing requirements for small farmers with few workers to larger farms and farm groups
- Working hours, working days, sick leave, and family medical leave (paid/unpaid) - adjusting to the wool industry
- Forming committees to address risks and grievance mechanisms
- Shall vs. Should - How far do you go?
Follow up

Requests for feedback

Requests for Charters to be signed and returned

Feedback request

1. Feedback on draft module – (circulated with notes)

2. Feedback on application:
   - Option 1. Voluntary module
   - Option 2. Continuous improvement approach: core criteria and additional voluntary criteria.
   - Option 3. Required module

Next calls

Next IWG call
- September 17, 2019 (2 hours)
- Animal Management
- Register on the website (https://responsiblewool.org/rws-2-0-revision/)

Join the IWG

Join IWG as an observer
• Notify responsiblewool@textileexchange.org.

Join IWG as a voting member.

• Sign and return the IWG Charter to responsiblewool@textileexchange.org.

Reminders for next call

The next call will take place on 17th of September at 3pm BST/10 am EDT. Joining instructions will be sent out by Textile Exchange Communications and also posted on www.responsiblewool.org.

We will revisit today’s topic and review feedback. Also look at chemical management and social criteria.

Register in advance for this meeting:

Link to register: https://zoom.us/meeting/register/e3214c618ef1f2be34538d7d4481ef37

After registering, you will receive a confirmation email containing information about joining the meeting, including a calendar reminder.

We are organizing a separate call for New Zealand and Australia that will take place on Wednesday, September 25th at 8am BST

Link to register: https://zoom.us/meeting/register/e276e3f48fcd78b38c34be5db4a05ad8