

Sustainable and Ethical Practices of the Down and Feather Industry

A Global Assessment of Industry Statistics and Practices



Written by Harry Schmitz, Ph.D.
Commissioned by the International Down and Feather Bureau (IDFB)

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EXECUTIVE SUMMARY

Despite their enormous popularity, down and feather bedding, apparel and outdoor products have come under increased scrutiny in recent years as more and more consumers seek to familiarize themselves with companies associated with the ethical treatment of animals. In researching the global down and feather industry and how down and feathers are procured for such products, the following observations and conclusions can be made:

- Demand for down and feather products is extremely high worldwide because they offer superior warmth, without added weight. Such products include pillows, comforters, duvets, mattress toppers, winter jackets, mittens and high-fashion coats, as well as outdoor sports items such as sleeping bags and extra-thermal jackets;
- Down and feather is a byproduct of the global food industry. From 2017-2021, about 3.7 billion ducks were raised for meat on average each year while about 690 million geese were raised for meat on average each year between 2014-2018. However, there are no farms that raise ducks and geese purely for the procurement of down and feather;
- More than a byproduct, down and feather is also a waste product of the global food industry. By taking this waste product and then cleaning and sanitizing it to be used in bedding, clothing and outdoor gear, down and feather contributes to the overall sustainability of our world;
- China is by far the world's largest producer of down and feather because duck is an important component of the Chinese diet. The European Union (EU) constitutes the second most prominent region of down and feather production;
- There are animal welfare laws in the food and agriculture industry. Manufacturers and wholesalers of down and feather sign pledges to abide by these laws in order to become members of industry organizations. Such organizations include the International Down and Feather Bureau (IDFB), which is the global association of the down and feather industry. Its members are comprised of individual companies as well as country and regional associations such as the American Down and Feather Council (ADFC) and the China Feather and Down Industrial Association (CFDIA).
- Down and feather products are derived from nature and are gentle on the environment. A recent global life cycle assessment (LCA) compared down to polyester fill and reported much lower impacts for down in five areas of environmental concern.

INTRODUCTION TO DOWN AND FEATHER

Down and feather products provide comfort and superior warmth to millions, without the excess weight inherent in other materials. Down jackets, coats, vests and mittens, once most appealing to skiers, hikers and hunters, are now part of the fashion wardrobe of city dwellers in northern climates worldwide. Similarly, comforters, duvets, bed toppers and pillows made from down and feather have moved from a luxury item to a staple as people seek out natural and sustainable choices of bedding to match their environmentally-conscious and healthy lifestyles.

When materials derived from animals are used in manufactured goods, it is natural to question the source of these materials and the practices used to procure them. While protecting endangered species in the wild often garners wide attention, the ethical treatment of domesticated animals is also a concern. As a consequence, even though materials derived from natural sources are often superior to synthetic substitutes, materials obtained from animals are under increased scrutiny.

Recently, the down and feather bedding and apparel industries have been subject to such scrutiny as questions are raised about the treatment of domesticated birds such as ducks and geese. In reality, a very small number of producers use questionable—even deleterious—methods of harvesting down and feather from these animals. Such methods derive from centuries-old traditions that are still practiced in small areas of the globe. However, such methods are censured by the industry as a whole. The vast majority of down and feather producers globally abide by sustainable and ethical procurement methods.

DOCUMENT OVERVIEW

In order to properly assess the animal welfare issues being raised by the public regarding down and feather, this paper has been developed to provide accurate and documented information about the down and feather industry on a global level and will address the following:

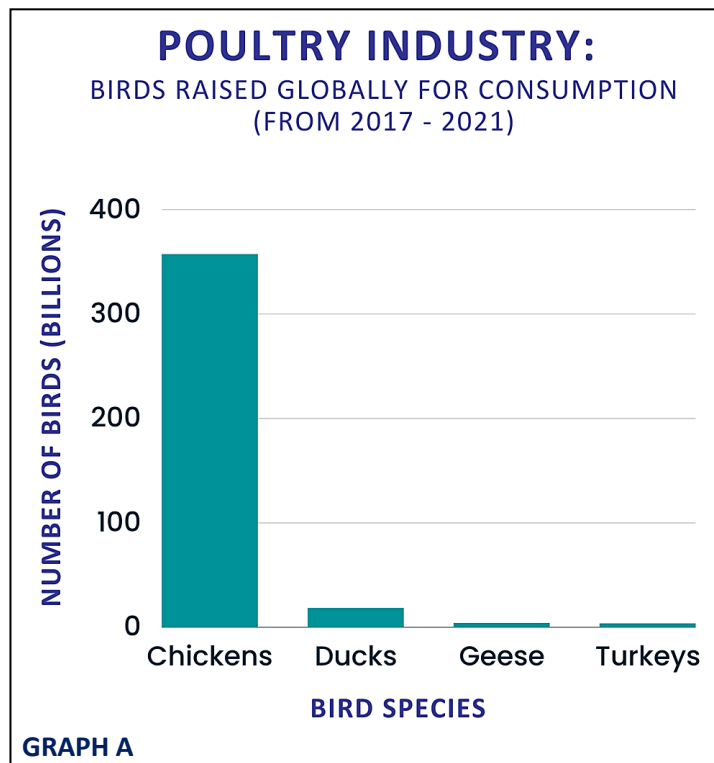
- An overview of the enormity of the poultry industry, with emphasis on the fact that down and feathers are a byproduct of the food industry and would otherwise simply be a waste material although, unlike polyester substitutes, this waste material is biodegradable;
- Global regions and countries from which the majority of down and feather is gathered;
- Methods by which down and feather is procured;
- Legal and regulatory bodies that govern these regions regarding down and feather procurement;

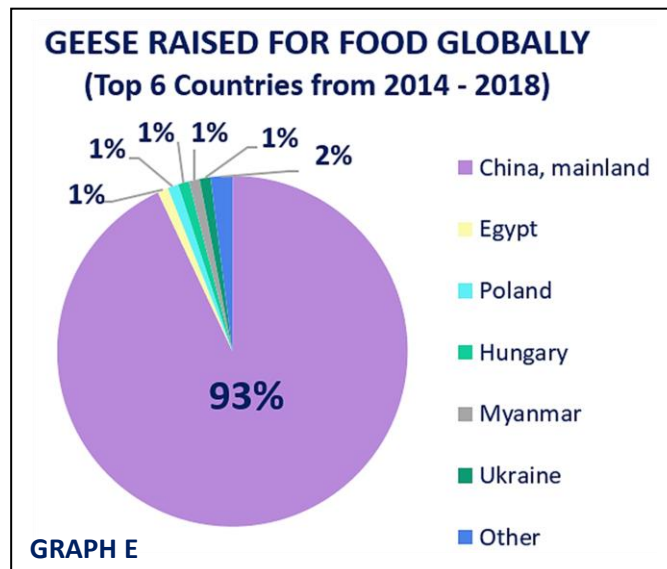
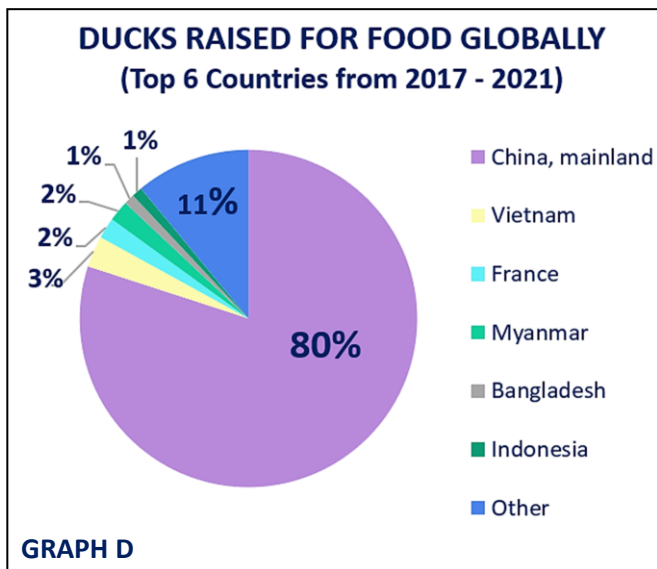
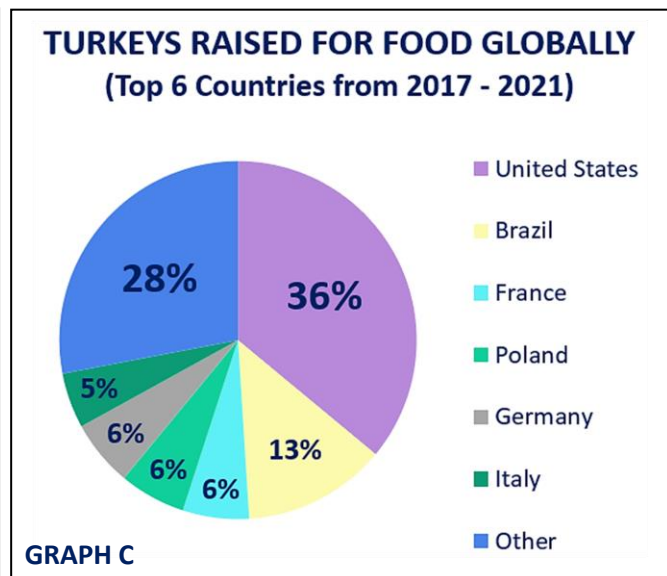
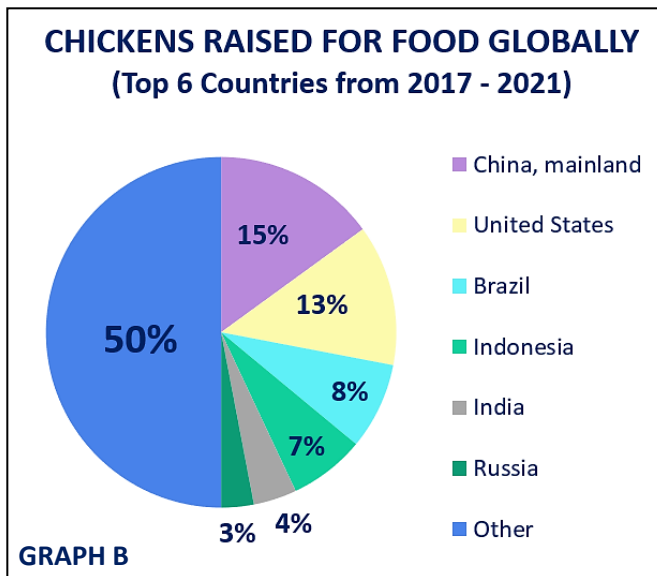
- Steps that the global down and feather industry has taken to assure retailers and consumers that it does not condone the unethical treatment of ducks and geese as it pertains to procuring down and feathers;
- The sustainability of the down and feather industry.

THE POULTRY INDUSTRY: A MODEL OF EFFICIENCY

Down and feather products are a byproduct of an enormous, efficient and highly-regulated global poultry industry, which produces not only eggs but also meat. Chickens, ducks, turkeys and geese serve as the main sources of food products in this industry, which has grown rapidly in modern times, largely as a consequence of refrigerated transport capabilities.

The down and feather industry reflects the culinary preferences of people from cultures around the world. According to statistics from the United Nations Farming and Agriculture Organization (UN FAO) [1], more than 357 billion chickens, globally, were slaughtered for meat during the five year period from 2017 through 2021, compared to the approximately 18.8 billion ducks, 3.6 billion geese and 3.1 billion turkeys that were slaughtered for meat during the same period. (See Graph A. Geese data for France and Hungary is incomplete after 2018.)





Although chicken is the most popular poultry product when it comes to global consumption, their feathers are unsuitable for down and feather products because chickens are land fowl and hence do not produce down for insulation. Therefore, down and feather materials used for bedding and apparel come mainly from duck and geese, which are consumed in varying amounts from country to country. (See Graphs B, C, D and E. Note in Graph E, the geese data for France and Hungary is incomplete after 2018.)

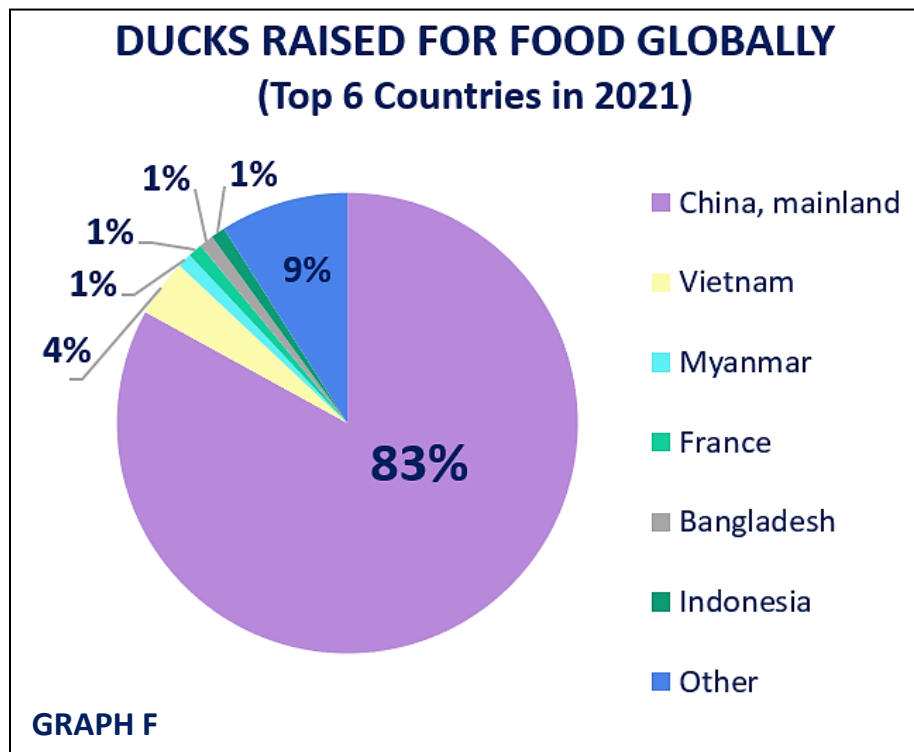
About 3.7 billion ducks were raised for meat on average for each year between 2017 and 2021, while roughly 690 million geese were raised for meat on average each year between 2014 and 2018. As a result, it is estimated that about 132 million kilograms of down and feathers are traded each year as a byproduct of the global production of duck and geese meat. This data is from the UN Comtrade Plus database which includes additional features compared to earlier versions of Comtrade. The previous

report incorrectly stated the average exports per year between 2009 and 2013; the correct number is 93 million kilograms average per year. Thus, exports are currently 42 percent higher than in previous years (2009 to 2013). [1, 2]

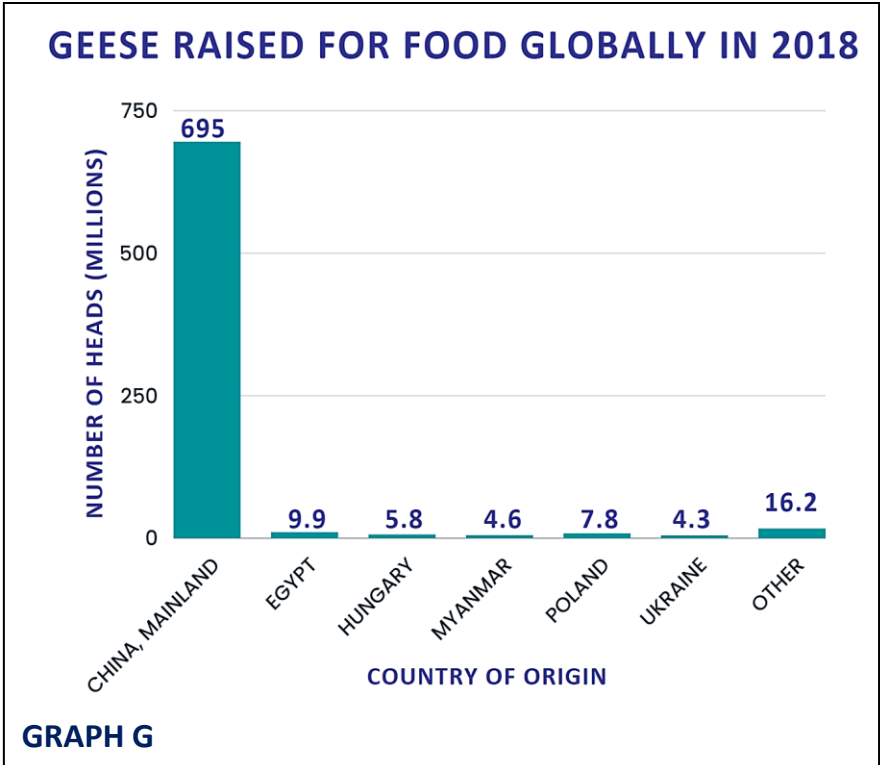
Having established that the geese and ducks are the main sources of down and feathers, let's take a closer look at the global supply chain.

DUCKS & GEESE: THE INDUSTRY AT A GLANCE

Global statistics for ducks aggregated by the UN FAO estimates that more than 4.3 billion ducks were slaughtered for food in 2021, with mainland China producing 83 percent of the world's supply of duck meat. In fact, the top 6 countries for duck meat production account for 91 percent of duck meat globally, with Vietnam, Bangladesh, France, Indonesia, and Myanmar accounting for less than three percent each. Roughly 66 additional countries from across the world contribute to the remaining nine percent of duck meat produced globally.



Considering China’s large population and that duck is a major component of the Chinese diet, it not surprising that 3.6 billion ducks were slaughtered in mainland China in 2021. Consequently, it is also not surprising that China is also the world’s leading supplier of down and feathers for apparel and bedding. Global statistics for geese production in 2018 show that China again dominates the industry by producing roughly 93 percent of goose meat in the world (more than 695 million geese). Among the European goose-producing countries in 2018, Hungary, Poland and Ukraine were the top producers of geese for meat, but their production is only a small fraction of the industry compared to China.



QUANTIFYING COMFORT

A case has been made here that down and feather products are a byproduct of independently-established agricultural industries around the world. The down and feathers that are used for apparel and bedding would otherwise become a waste material if not for its superior insulating properties compared to man-made materials.

Superior thermal insulation evolved in waterfowl because of their contact with water; their down and feathers must provide insulation from the cold streams and ponds that are their natural habitat. But this insulating down also must be lightweight enough to allow flight. Thus, nature created the combination that remains the hallmark of down and feather products today: superior warmth without added weight.

The insulating properties of down and feather products are quantified in terms of the “fill power,” which is a measure of the volume-filled-per-unit weight using standardized measurements. This value characterizes just one quality of down and feather products, although it is an important property. Fill power is the value most frequently encountered on labels by consumers and it is commonly used by consumers to compare products in the marketplace. Fill power is partly a function of cluster size. Since large, mature birds tend to produce larger down clusters, higher values of fill power can be obtained using down clusters from mature geese.

Since the measurement of the quality of down and feathers is so important to grading materials for global trade, several laboratories have been established to test, inspect and evaluate the properties of down and feathers.

Many testing laboratories have been certified by the International Down and Feather Bureau (IDFB) across the U.S., Europe and Asia. An example is the International Down and Feather Laboratory (IDFL), which maintains a large database of research pertaining to industry trends and testing procedures [3-5]. See Table 1 for a list of laboratories that are certified by the IDFB.

ANIMAL WELFARE STANDARDS

It is evident that down and feathers from ducks and geese are a byproduct of the food industry. Therefore, these animals are treated in accordance with industry standards established for the food industry.

A key organization for animal welfare is the World Organisation for Animal Health, formerly known as the Office International des Epizooties (OIE) and still referred to by its historical acronym. The OIE has 182 member countries and is an international reference organization for animal health and a leading international organization for animal welfare. Its standard-setting activities in the field of animal welfare focus on eliminating potential hazards existing prior to the slaughter of animals or the primary processing of their products, either of which could be a source of risk for consumers. The OIE benefits from direct collaboration with veterinary and sanitary services, including the governmental and non-governmental organizations that implement animal health and welfare measures and other standards and guidelines in its member countries. [6, 7]

The European Union is another leader in setting standards for animal welfare, a practice it has upheld for over 40 years. In fact, the EU took an important step regarding this issue when it established the [Council Directive 98/58/EC](#) of 20 July 1998 concerning the protection of animals kept for farming purposes [8]. This legislation gives general rules for the protection of animals of all species kept for the production of food, wool, skin or fur (or for other farming purposes, including fish, reptiles or amphibians). These rules are based on the European Convention for the Protection of Animals Kept for Farming Purposes [9], and they reflect the so-called “Five Freedoms” which are summarized as follows:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury and disease
- Freedom to express normal behavior
- Freedom from fear and distress

In the United States, welfare laws for animals raised for food are set forth by the United States Department of Agriculture (USDA). Most animals raised for food are covered by the Humane Slaughter Act of 1958, which specifies how animals must be treated during the slaughtering process. Furthermore, many U.S. States have additional laws on general and farm animal welfare. [10]

China is another country in which the harvesting of down and feathers is highly regulated. On behalf of the government, the China Feather and Down Industrial Association (CFDIA) plays a pivotal role in the feather and down industry by establishing the regulations for down and feather products; handling and settling international disputes on down trade products; and actively managing the relationships among down and feather producers, retailers and end consumers. Furthermore, CFDIA advocates the protection of animal welfare, opposes animal abuse and leads the China feather and down industry to fulfill its social responsibilities as outlined in the following section.

TRACEABILITY

Standards for the harvesting of down and feathers are based on in-depth scientific documents that examine current practices and determine how the welfare and well-being of the birds can be improved. As previously noted, the global supply chain for down and feather includes an extensive network of laboratories, which test down and feather materials for the purpose of grading and monitoring the quality of these materials in the marketplace. In the process of monitoring for quality, representatives from these laboratories personally visit hundreds of duck and geese farms, including farms in Europe

and Asia. IDFL CEO Wilf Lieber notes that his organization conducted more than 10,000 traceability audits since 2008, covering over 2,000 separate site visits in Asia, Europe and North America. The total number of sites documented, including individual units in farm groups, now exceeds 40,000.

IDFL audit work includes all parts of the down and feather supply chain, including farms and other raw material sources, slaughterhouses, synthetic fiber processors, down and feather processors, and finished product sewing factories.

According to Mr. Lieber, the efforts by producers and buyers to document this supply chain have yielded very positive information about the ethical sourcing of down and feathers. In fact, the audits conducted by IDFL confirm that live plucking of ducks and geese is far from prevalent. Mr. Lieber estimates that the practice is so rare that it represents less than 0.5 percent of the industry, an estimate that has been confirmed in IDFL discussions with other auditing institutes.

Currently, *very few* European countries are permitted to harvest down and feather from live birds, and such practices are allowed *only* during molting season under clearly defined legal stipulations. Because of changing market demand, the harvesting of down and feathers from live birds has been eliminated almost completely. Only a few Asian countries import East European down from harvested sources. The following processes only apply to the tiny amount of material legally harvested from live birds and exported to Asia. Molting—or *moulting*—is the period of time in which a bird naturally changes its feathers. Molting is a natural, but complex, process because the birds must retain some of their feathers to keep warm; when a new generation of feathers has matured, the old ones are shed. The molting of geese allows for down and feathers to be gathered after they have fallen off the geese. During molting season, geese can also be gently brushed or combed to remove loose down and feathers. This harvesting process is governed by a number of provisions, including the European Convention for the Protection of Animals Kept for Farming Purposes. According to this standard, the harvesting of feathers may not take place outside of the molting season, and live-plucking is strictly forbidden by law. The European Down and Feather Association (EDFA) has been dedicated to checking and monitoring farms and breeding plants for years as part of its traceability program, to ensure these standards are met across Europe. [11]

Of particular note is a document from the European Food Safety Authority (EFSA) titled “[Scientific Opinion on the Practice of Harvesting \(Collecting\) Feathers from Live Geese for Down Production.](#)” This document states that during the moulting period the practice of gathering down and feathers may be done as long as it is without pain and a controlled system—such as brushing or combing the geese—is put in place to ensure that only moulting feathers are gathered from live birds. However, according to the document, it is estimated that 99.5+ percent of the worldwide feather production is a byproduct of the food industry, meaning that less than 0.5 percent of the world production of feathers and down is

from live geese. The IDFL has found that this small percentage tends to be harvested in eastern European countries, particularly in Hungary where less than 2 percent of the feathers produced are harvested from live birds. The EFSA report also notes that any grotesque practices by untrained farmers in this region are gradually being eliminated. It points out that forcibly plucked goose feathers can be differentiated from those that have been shed through the molting process. Furthermore, plucking the feathers and down from live geese damages the birds and does not make sense economically for the farmer. [12]

At a global level, the IDFB neither supports nor condones the illegal harvesting of feathers and down from live birds. All IDFB members—which include country trade associations across Europe, Asia and America, as well as individual companies from around the globe— follow this same standard regarding the treatments of birds.

Therefore, manufacturers of down and feather products from around the world monitor their suppliers to ensure that industry standards are followed and that the birds are treated in an acceptable manner. For example, the American Down and Feather Council (ADFC)—an IDFB member—requires its members to sign a pledge that states they do not condone illegal harvesting practices for down and feathers and do not utilize feathers harvested from live animals (See Addendum 1). Members of the China Feather and Down Industrial Association, another IDFB member, adhere to the same commitment. According to Madam Yao Xiaoman, Chairwoman of CFDIA, since 2009 members were asked to sign the “Non-Live Plucked Products Guarantee,” in which they voluntarily agreed to comply with detailed regulations on behalf of animal welfare, including the refusal to produce, process or sell products made from down and feathers that are live-plucked. Furthermore in 2020, as a mission to put forward higher goals and requirements in China’s down industry, China’s first waterfowl animal welfare standard titled “T/CAI 001-2019 Farm Animal Welfare Requirements – Waterfowl” was published and implemented.

In the beginning of 2021, the CFDIA updated the “Non-Live Plucked Products Guarantee” to “Waterfowl Animal Welfare Commitment.” (See Addendum 2). Additionally, it established registration lists of committed down companies as well as animal welfare farms as the main bodies responsible for implementing regulations. All of these promote the effective implementation of animal welfare protection measures at the source of the down and feather industry. More than 70 companies sign the Commitment every year. [13]

To this point, the concept of live-plucking wasn’t introduced to China until the twentieth century. This practice remained uncommon among Chinese farmers even prior to the inception of the “Non-Live Plucked Products Guarantee” in 2009. It not only goes against the protection of animal welfare, but also results in higher production costs and greater bird death rates. As such, live-plucking no longer has a foothold in China’s down industry.

SUSTAINABILITY

In our environmentally-conscious world, procedures and regulations exist to measure the effects of production on the environment. A Product Category Rule (PCR) of Down and Feather was developed as part of a pilot program to accurately measure the Carbon Footprint of Products (CFP). Down and feather is classified as “intermediate goods,” *i.e.*, goods sold from one business to another for use in final products or services. These goods are sold by industries to one another for the purpose of resale or producing other goods. [14]

This PCR applies collectively to both down and feather. It takes into account the entire production process from the transport of coarse feather and down, *i.e.*, feather and down immediately after being removed from bird carcasses; through pre-treatment and pre-sorting, which includes removing feather and down from coarse feather and down; to the refining process and pre-washing; to the appropriate treatment of waste products, *etc.*; and the treatment process for disposed products, *e.g.*, incineration and landfill, *etc.*, as well as preliminary recycling process for recycled products. The PCR applies only to the raw material procurement stage and the production stage for the intermediate products or business-to-business products. It also includes provisions related to transport.

The data collected using the PCR for Down and Feather indicates that the production of this material has a relatively low carbon footprint compared to synthetic materials. The main reason for this low carbon footprint is that the down and feather is a recycled waste product derived from the process of raising ducks for food. Processes such as the “breeding of ducks” and “slaughter of ducks” are not included in the calculation of this PCR, because the original purpose was to breed ducks as a food source, with the down and feather serving as a byproduct or a waste product.

Clearly, as vast as the poultry industry is, not all down and feather byproduct can be used when it comes to making bedding and apparel. In fact, according to EDFA, it is estimated that in Germany alone, the bed feather processing industry generates around 950 tonnes of waste feathers. This figure is multiplied accordingly for the European market. Typically, waste feathers are collected by waste management companies (such as gardeners), taken to disposal sites or destroyed in incinerators. This fact inspired EDFA to commission the University of Hohenheim, in Germany, to carry out a study to determine if poultry feathers could serve as an organic nitrogen fertilizer in agriculture and horticulture. [15]

The study found that feathers release nitrogen at a relatively fast and continuous rate, and that the effectiveness of feather meal as a fertilizer is equal to that of horn meal, which is already used as an organic fertilizer in the agriculture and horticulture industries. Therefore, this study further supports the claim that down and feather products are more sustainable than those made of synthetic materials, in the sense that not only are they a by-product of the food industry but also they can ultimately be recycled at the end of their lifetime.

To test the environmental footprint of down and feather, IDFB commissioned Long Trail Sustainability, an independent third-party firm specializing in Life Cycle Assessments (LCAs) and sustainability reports, to conduct a global LCA titled “Environmental Footprint of Down Vs. Polyester Fill Material.” The assessment analyzed the environmental impact of down fill material versus polyester in five environmental areas: human health, ecosystems, resources, cumulative energy demand, and climate change. The LCA reports that, on a per ton basis, down has 85 to 97 percent lower impacts than polyester in all the aforementioned categories that were studied. [16]

The study further emphasizes that down is measurably preferable to polyester in the environmentally areas analyzed. Comparing the environmental footprints of down fill against synthetic alternatives validates the sustainability of the industry: Down fill has 18 times less environmental impact than 100 percent polyester fill.

CONCLUSION

Down and feather is a byproduct of the enormous global food industry. No farms raise ducks and geese purely for the procurement of down and feather for bedding, apparel and outdoor gear. In fact, plucking feathers and down from live ducks and geese is detrimental to the industry, because this practice damages both the birds and the quality of the down and feather. Animal welfare laws in the food and agriculture industry promote the proper treatment of ducks and geese, and manufacturers—as well as the majority of wholesalers—of down and feather must sign pledges to abide by these laws before becoming members of organizations in the down and feather industry.

More than a byproduct, down and feather is also a waste product of the food industry. Instead of contributing to our worldwide landfill issues, after the birds are killed for consumption the feather and down is cleaned, sanitized and recycled into the products mentioned above, which contributes to overall global sustainability. Since down and feather products are derived from nature, they pose little to no harm on the environment. The manufacturing of these products leaves a lower carbon footprint than that of synthetic materials.

ABOUT THE INTERNATIONAL DOWN AND FEATHER BUREAU

Founded in 1953, the International Down and Feather Bureau (IDFB) is the global trade association of the down and feather industry (processors of raw material and/or producers of finished articles, filled with down and feathers), and of independent testing institutes for down and feather filling material around the world.

IDFB members include national industry associations, as well as testing institutes. In countries where there are no established national or regional associations, single companies can become members.

GOALS

- Provide safety to consumers by providing clear, simple and easily understandable definitions;
- Develop and promote International Standards for down/feather fillings (IDFB Standards contain definitions and testing regulations);
- Provide annual re-assessment of approved Testing Institutes to guarantee the maintenance of International Standards;
- Provide assurance: Annual check-up of the approved Testing Institutes to guarantee that the same testing methods are in place worldwide;
- Provide annual round robin assessment of independent testing institutes and other participating laboratories guaranteeing worldwide maintenance of international test and quality standards.

CONTACT

The International Down and Feather Bureau
Rheinstrasse 27
6890 Lustenau, Austria
T: +43 664 968 6030
idfb@idfb.net

ABOUT THE AUTHOR

Harry A. Schmitz, Ph.D., was graduated with a doctorate in Materials Science & Engineering from Stony Brook University of New York. He currently serves as a public relations technical specialist and researcher with emphasis on materials and technology. As a technology communicator, Dr. Schmitz has led global business-to-business campaigns for clients in lasers and fiber optics as well as materials, metals, transportation and climate control. As an academic, Dr. Schmitz also published several papers in peer-reviewed professional journals and made presentations at international conferences.

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TABLE 1

IDFB Certified Test Laboratories	Country
Boken Quality Evaluation Institute	Japan
Bureau Veritas Consumer Products Services (Guangzhou) Co.Ltd.	China
Bureau Veritas Hong Kong Ltd.	China
Down and Feather Testing Laboratory, Silk Inspection Center of Hangzhou Customs	China
FITI Testing & Research Institute	South Korea
Guangzhou Customs District Technology Center	China
Guangzhou Inspection Testing and Certification Group Co., Ltd.	China
IDFL China	China
IDFL Europe	Switzerland
IDFL Salt Lake	USA
IDFL Taipei	Taiwan
IDFL Vietnam	Vietnam
Intertek Korea SoftlinesSeoul-Lab	Korea
Intertek Testing Services Hong Kong	China
Intertek Testing Services Shanghai Ltd.	China
Intertek Testing Services Shenzhen Ltd.	China
Intertek Testing Services Tianjin Ltd.	China
Intertek Testing Services Wuxi Ltd.	China
Japan Textile Products Quality and Technology Center QTEC Nagoya Testing Center	Japan
KOTITI Testing & Research Institute	Korea
Nanjing Customs Industrial Products Testing Center	China
SGS Hong Kong Ltd.	China
SGS-CSTC Standards Technical Services (Shanghai Co.Ltd.)	China
Shanghai Institute of Quality Inspection and Technical Research	China
Shenzhen Academy of Metrology and Quality Inspection	China
Sichuan Province Fiber Inspection Bureau	China
Technology Center of Hefei Customs District	China
Textile Industrial Products Testing Center of Nanjing Customs	China
Umou Science Lab	Japan

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ADDENDUM 1



ADFC Member Certification on the Humane Treatment of Ducks and Geese

I, _____, certify that I am _____ of
(Name) (Title)
_____ and am authorized to certify the following:
(Company)

_____ is a member in good standing of the
(Company)
American Down and Feather Council (ADFC), a section of the Home Fashion Products Association, a voluntary association of manufacturers of natural-fill bedding products, as well as dealers, buyers, sellers and processors of feathers and down for use in home fashion products.

The down and feathers that fill our comforters, pillows, featherbeds, and other products come from ducks and geese that have been raised as food, not for their plumage. The down and feathers we use are a by-product collected during the cleaning process after the animals have been euthanized for food production.

_____ fully supports and encourages the humane treatment
(Company)
of animals, including the ducks and geese from which our down and feathers originate. We do not condone illegal harvesting practices for down and feathers and we do not utilize feathers from animals that have been harvested while alive.

We certify that our down and feathers have been collected by us and/or our suppliers from animals after they have been euthanized to be consumed for food. We further certify that we are collecting these feathers in accordance with industry standards and the law.

Name/Title

ADDENDUM 2



中国羽绒行业水禽动物福利管理办法（试行）

Measures for the Administration of Waterfowl Animal Welfare in China's Down Industry (for Trial Implementation)

签署承诺书的企业应履行以下义务:

Committed companies shall adhere to the following regulations:

1. 以推动水禽动物福利保障为目标, 倡导推行T/CAI 001-2019《农场动物福利要求 水禽》团体标准, 要求供应链源头养殖场和养殖户杜绝活体取绒、强迫喂食等虐待动物的行为。

With the goal of promoting waterfowl animal welfare protection, actively advocate and carry out T/CAI 001-2019 Farm Animal Welfare Requirements - Waterfowl, which requires the breeders and farmers to prevent animal abuse behaviors such as live-plucking or force-feeding.

2. 建立羽绒羽毛溯源备案制度, 在羽绒羽毛交易的凭证 (如合同、发票、收据等) 中记录原料的来源和流转信息, 确保供应链信息的明晰和完整。

Establish a down and feather traceability recording system; record the source of and transfer the information about raw materials from transaction documents (such as contracts, invoices, and receipts); and ensure the clarity and integrity of the supply chain information.

3. 生产、销售动物福利羽绒羽毛及制品, 在企业规章、生产规范及其它相关制度中予以明示。

Produce and sell down and feather products in accord with animal welfare, clearly indicating this on the company rules, production regulations, and other related requirements.

4. 如供应链源头养殖场和养殖户的备案信息发生变更, 应告知协会并做更新。

If there are any changes to the recorded information relating to the source breeders or farmers, the company must inform CFDIA to update these changes.

5. 自愿接受协会的审核和监管, 积极配合不定期检查。

Agree to be supervised and audited on an aperiodic basis by the CFDIA.