



16 DECEMBER 2022

CONSULTATION FEEDBACK



SUSTAINABLE FIBRE ALLIANCE

Consultation Feedback

Summary

The below comments are the combined consultation feedback regarding the development of the SFA Cashmere Standard. In total, we received over 200 comments, suggestions and recommendations to clarify and improve the SFA Cashmere Standard.

Over the course of 2022, the SFA has welcomed comments from subject matter experts and key stakeholders in the cashmere fibre supply chain. The SFA also held a public consultation held from 31st October to the 2nd December seeking input from anyone who has interest in, or would like to engage in, the standard development process. Additionally, three stakeholder roundtable events were held, arranged by the SFA UK office, SFA Mongolia and ICCAW, our Chinese in-country partner.

Our sincere gratitude to those who participated in the consultation process and gave their time and energy to supporting the work of the SFA.

Feedback	Indicator ref:	SFA Response	Revised Criterion / indicator suggested wording?
<p>the first indicator here speaks to “making herders understand the value and conservation relating to natural resources” – I think that with this, our Standard shouldn’t focus solely on herders; other actors like [farm] managers, herder households, ranch owners and cooperatives may be involved as well, so having Indicator 11.1 include only herders as its sole subject may feel a bit narrow in terms of scope. Also, domestically speaking, there’s still a ways to go with the idea of making herders understand all of this about natural resources, soil and rangeland health. I do think that full understanding of all this is necessary for land management, the government and business entities, but there’ll definitely be some problems at the individual herder level.</p>	<p>1.1</p>	<p>The scope of the SFA Cashmere Standard must be applicable to those who can feasibly implement the criteria and indicators. We will review the capacity building on knowledge and challenges that land management presents for all, not only herders, however keeping criteria and indicators as focused as possible, with a limited scope to herders, will support the SFA to measure impacts as well as identify additional training needs.</p>	<p>Producers must comply with applicable law and regulations in the jurisdictions in which they operate.</p>



<p>Then, coming to soil-related indicators, namely 12.3, my concern is with the last statement, “reducing the prevalence of unpalatable vegetation” – I feel this isn’t quite reasonable. Most of our goats are either herded in desert steppes or steppe desert regions, and the plants that can be foraged by goats there are relatively high-protein herbaceous plants as well as sub- or full shrubs. Plants that might be considered “unpalatable”, like ammopiptanthus or other poisonous weeds, cannot be extermination or removed by mowing, or reduce its growth in the vegetation succession – it’s just not reasonable. There’s interaction between plant species where for instance, the overground parts of certain plants may not be easily foraged by goats, but other symbiotic or parasitic plants that attach to it are. So I don’t think it reasonable to “reduce their prevalence” – those are my thoughts on 12.3.</p>	<p>12.3</p>	<p>Thank you for such detailed feedback. We have adjusted the wording of this indicator.</p>	<p>Locally relevant practices must be implemented to improve palatable grazing resources for livestock and wildlife populations, including maximising plant diversity and cover.</p>
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<p>Then coming over to Criteria 13... 13.1, for instance, requires buffer zones to be implemented to protect water courses and wetlands so that fertilisers and antibiotics – substances with excess chemical elements can be filtered or entrapped. So here, the expression used regarding conservation of water courses and wetlands isn't quite adequate. More specifically, by what means do we achieve this - do we need to set up necessary equipment and facilities, or something else? The expression here being just a very simple "buffer zone" or "storage of fertilisers and chemicals" feels confusing, at least in Chinese.</p>	<p>13.1</p>	<p>Buffer zones and the proper storage of fertilisers and chemicals is only a suggested approach and not mandatory. It was written as an example, not creating an expectation on behaviour or performance. We have updated the wording to ease understanding in translation and will ensure that the standard guidance makes recommendations on recommended approaches.</p>	<p>Measures must be implemented to protect water courses and wetlands.</p>
<p>13.3 – concerning transporting alien species, I believe one subject, "animals" is missing. Examples given here for carriers of alien species include soil, plants and water, but the biggest carrier of alien species are animals, more specifically, when animals are moved, sometimes the seeds of alien species are attached to their fur, making them the most common carrier – so I think "transportation of animals" should be included here.</p>	<p>13.3</p>	<p>Adjustment to the indicator wording has been made.</p>	<p>Measures must be taken to avoid unintended introduction of alien species e.g., through the transportation of soil, plant materials, water, animals etc.</p>



<p>And then at 13.7, where it mentions minimising the risk of wildlife predation and harassment during goat farming. So one half of the risk is natural food chain predation - animals being eaten. But another important part of this is communicable diseases contracted from wildlife – this should be taken into consideration as a part of Criteria 13.</p>	<p>13.7</p>	<p>An additional indicator within 13.8 has been included to specifically refer to communicable diseases contracted from wildlife.</p>	<p>Locally relevant practices must be implemented to minimise the risk of communicable diseases being contracted from wildlife.</p>
<p>And then page 17, Indicator 15.3 here, concerning pest control within the environment, where obviously prevention should be the priority; and in the process of prevention, we should adopt biological, cultural, and physical methods. So about “cultural methods”... How would I put this, generally we’d say biological, physical, and chemical, so I’d be interested to know how “cultural” could be interpreted. I think one important aspect of making the Standard universal is to make it easy to understand what these cultural measures or methods entail. So that’s 15.3, where I don’t quite understand what these “cultural methods” might be.</p>	<p>15.3</p>	<p>When using the term cultural, we are referring to locally relevant practices that may be unique to particular communities or region. However, this can be explained in the guidance, so it has been removed from the indicator.</p>	<p>Biological, physical and other non-chemical methods are prioritised for pest control.</p>



<p>In 15.4, it says once a certain threshold of pest level is reached, the chemical control used has to be low toxicity and mitigate resistance. I feel like the expression here needs to be in tandem with the above section that talks about entrapment of heavy metals or elements in water courses and habitats; otherwise, it'd seem like where before you were just talking about how chemicals shouldn't be used, now you're saying what to do once chemicals are used. There needs to be a definite statement on where the line is, I think.</p>	<p>15.4</p>	<p>We have added an additional point linking the use of pesticides back to the requirements set out in criterion 13. This then links the use of pesticides to the impact of water courses and wider habitats. The guidance document will also provide context on how thresholds are set and when the use of pesticides should be considered.</p>	<p>Pesticides must only be used once a certain threshold of pest level is reached that has potential to cause harm to livestock or the pasture. If pesticides are used:</p> <ul style="list-style-type: none"> a) low toxicity active ingredients are preferred. b) they are applied in a way to mitigate resistance, c) their use must comply with requirements of criterion 13 – 'Biodiversity and natural habitats are conserved and enhanced'.
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<p>And then 15.7 – “chemical fertilisers must only be used when there is a demonstrable pasture need.” So about the scientific rationality, environmental pollution, and the evaluation aspects concerning the usage of chemical fertilisers on pastures – and this might relate to some international standards and our actual practice too – normally, when organic fertilisers and chemical fertilisers are effectively used in combination, the procedure in fact benefits and promotes pasture robustness, whereas overuse of chemical fertilisers are detrimental. In the process of fertilising steppes in Inner Mongolia, there was an issue discovered where, originally, we advocated the use of organic fertilisers wherever possible, but when doing so, it was found that current-day organic fertilisers tended to contain excess amounts of antibiotics, making them actually less functionally adequate than chemical fertilisers. So coming back to this usage of organic fertilisers at appropriate amounts or at certain thresholds, restricting usage entirely or only allowing use when there is demonstrable need – does this feel a bit too categorical? I tend to think so.</p>	<p>15.7</p>	<p>The wording of the indicator does not set a requirement for use of chemical or organic fertilisers, only that their use is answering to a demonstrable need. We believe this aligns with your comment on the improvement to pasture robustness, if there is a demonstratable need to improve pasture robustness, then fertilisers can be used. The SFA has not made any specific requirements on type of fertilisers, however we will refer in the guidance to criterion 13 and how their use should consider the conservation and enhancement of biodiversity and natural habitats.</p>	<p>Fertilisers must only be used when there is a demonstrable pasture need.</p>
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<p>Really good to move to the 5 domains. Stock rates doesn't translate correctly. Mice and rodent should also be included in the pest section. Snow should also be included.</p>	<p>12.2</p>	<p>Thank you for your feedback, we are encouraged by your support to the use of the five domains, this aligns with other feedback we have received. The inclusion of mice and rodents will be added to the guidance as a definition of a pest.</p>	<p>Stocking rates must be appropriate for the pasture, reflect the importance of native species and take into account land type, pasture quality, seasonal conditions, class of stock and available feed resources.</p>
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<p>I want to comment on Indicators 17.9, “Goats must be able to browse shrubs and bushes” and 17.10, “Goats must have access to natural grazing pasture unless adverse weather conditions would negatively impact their welfare”. These two I think wouldn’t so easy to achieve in some conditions, especially considering the Standard is aiming for universal applicability and may have to account for different forms of husbandry. In China, for instance, there’s a grazing prohibition in place – sometimes grazing is banned, so it’d be challenging to meet these requirements. I don’t recall there being similar requirements in organic farming. either with regard to activity space, where animals aren’t allowed to be penned in all the time and have to be let out into open space outside their housing where they can free range. That’s why I think, if the idea is to expand the scope of applicability for the Standard, these two indicators can be left out, otherwise it puts a limitation on many cashmere goat farmers. As it stands, it’s unlikely cashmere goat farming would meet Standard requirements, especially from the perspective of ecological conservation where a lot of regions have implemented seasonal grazing</p>	<p>17.9 & 17.10</p>	<p>The SFA would never expect a user to contravene local regulation, national law or any other legal mechanism, so if there is a prohibition on grazing the standard user would not be found in non-compliance with this indicator. We have adapted the wording to note that, "where applicable" goats should have access to grazing materials and natural pasture lands. The guidance will add context to what is acceptable within the remit of local applicable law and definitions on natural pastureland.</p>	<p>17.9 - Where applicable, goats must have access to materials to browse, such as shrubs and bushes. 17.10 - Where applicable, goats must have access to natural grazing pasture for as much of the year as possible, unless adverse weather conditions would negatively impact their welfare.</p>
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<p>prohibition and don't allow animals to graze all year long. So with that in mind – ecological conservation – I think these points should be taken out - at least that's my opinion. Because some of our rearing of cashmere goats is housing-based – that's my opinion.</p> <p>From a policy standpoint, grazing prohibition is seasonal. In Erdos here for example, grazing is allowed some times during the year. ...But then there are some agricultural areas (Translator's note: believe this is a specific term for dedicated farming zones in China) that also feature cashmere goat farming, and these places don't have access to native pasture, so they adopt confinement rearing instead. So if we're talking about these confinement-reared cashmere goats, they wouldn't have access to the conditions laid out in 17.9 and 17.10 – they'd be raised in pens year-round. So that's the situation.</p>			
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<p>And then there's 18.1 which states "Goats must have access to clean, safe drinking water each day, with the ability to drink their fill at least every 12 hours." So my suggestion is to remove the clause "at least every 12 hours", because in the above text it's been mentioned that "animals must have access to safe and clean drinking water daily", with the word "daily" already being indicative of overall intent, and here the "12 hours" can be omitted because especially during pasture grazing, animals are let out in the morning and may not return promptly in the afternoon within the 12-hour window, but in times like summer when animals feed on fresh grass, part of their water intake comes from that as well.</p>	<p>18.1</p>	<p>Thank you for your suggestion, we have amended the wording and removed the minimum of every 12hrs from the indicator.</p>	<p>Goats must have access to clean, safe drinking water each day, with the ability to drink their fill.</p>
<p>In Ordos and other rural zones they do not have access to natural pasture so they are forced indoors for most of the year</p>	<p>17.9 & 17.10</p>	<p>As noted above, we have adapted the wording to ensure that where applicable goats must have access to natural pasture, however if this is not feasible, this would not raise a non-conformance.</p>	



<p>And then there's 21.3 – "If artificial lighting is used in goat housing / shelter, there must be a period of low level lighting during the day to promote resting behaviour." So this kind of farming method... illumination (Translator's note: this word in particular was hard to discern, may have misheard) method is not something I have heard in practice with regard to cashmere goat farming; I don't think it feasible to obscure light altogether, since in the previous text it's stated that during the day goat housing must be ventilated and naturally lighted – 21.2 states "Goat housing / shelter must provide natural light", so 21.3 feels redundant in that sense and can be redacted.</p>	21.3	<p>This indicator will be written not only for China, but for other regions as well. The indicator wording states that "if artificial lighting is used". Thus, if it is not used, then this indicator would not be applicable to the auditee and therefore no non-compliance would be raised. A similar approach has been incorporated for indicator 21.4.</p>	<p>If artificial lighting is used in housing / shelters, there must be a period of low-level lighting during the day to promote resting behaviour.</p>
<p>Goat housing and shelter, duplicates 21.3</p>	21.2	<p>We have amended the wording to 21.2 to note that ventilation is necessary and where applicable natural light must be used, however if artificial lighting is used, the requirements under indicator 21.3 and 21.4 must be followed.</p>	<p>Housing / shelters must be well ventilated and provide natural light.</p>
<p>Then coming to 21.5 – "Housed goats must have access to bedding". This will be likely unattainable for households and general herders. We can guarantee the cleanliness and dryness of goat housing, though. Bedding, on the other</p>	21.5	<p>Many thanks for your comment, the applicability of bedding will be detailed in the guidance as larger, static production farming, where bedding is used more often will need to comply with the requirements of this indicator.</p>	<p>Housing / shelters must have access to bedding or a suitable flooring which is dry, maintained at an appropriate level of cleanliness, is sufficient to lie down and avoids discomfort.</p>



<p>hand, isn't feasible or possible for producers.</p>			
<p>And then 21.6 - "All housed animals should not be reared on slatted flooring." I'm not sure if in theory, there is a particular detriment to rearing animals on slatted floors? Especially under current facility conditions, for the purpose of housing cleanliness as well as production efficiency, slatted floors are fairly ubiquitous. So I'm curious to know, what are the considerations for restricting the use of slatted floors? The same question goes for 21.7.</p>	<p>21.6 & 21.7</p>	<p>The use of slatted floor for goats that are injured, infirmed, heavily pregnant and kids pose a risk to their health and also welfare, as if the slatted floor was not designed for use with goats, they could injure themselves by becoming caught in flooring. If the slatted flooring is designed in such a way that this is impossible to cause injury or it is difficult to walk on, then this would not raise a non-conformance.</p>	<p>21.6 - The flooring for housed goats must provide good traction. Where possible, housed animals should not be kept on a slatted floor. 21.7 - Housed goats who are sick, injured, pregnant or young must not be kept on a slatted floor.</p>
<p>21.10 – "When goats are housed for longer than Xhrs, they must have access to additional space to allow natural behaviours." So I assume this indicator relates to housing-based production – full housing-based – where animals need exterior space for activity. If this is the case, then I suggest change the sentence to "exterior activity space should be provided, so as to allow for goats' freedom of activity." This way production becomes easier to manage, more convenient.</p>	<p>21.10</p>	<p>Many thanks for your contribution. We have amended the wording of this indicator to reference the use of external space.</p>	<p>Goats in farming systems must have access to an exercise area that is at least 2.5x times larger than their usual housing / shelter.</p>



<p>And then there’s the block on animal welfare, 22.1 – “Goats must be handled calmly, humanely and without excessive force. Goats must not be mistreated in anyway...” with quite a few examples listed under: kicking, striking, tripping, etc., which are, to be sure, acts of abuse; however during some production processes, not all of these items can be totally avoided, so I think revising this to “under no circumstances are animals to be subject to mistreatment” is good enough. And finally, going back to indicator 2.1 here – “The Producer must monitor performance and progress against mandatory and improvement Indicators through the collection of the SFA Cashmere Standard Results Indicators.” – I don’t think the definitions for mandatory and improvement indicators are clearly outlined here, so during production and implementation of the Standard, it might be hard to match areas of performance with them.</p>	<p>22.1</p>	<p>Thank you for your comment. We have been specific in this to demonstrate examples of what is not acceptable treatment of the goats. It has also defined that these actions are listed at the levels of excessive, abuse, mistreatment. As you noted that sometimes actions are carried out, but these must not be to the level that would constitute abuse. As an examples when moving goats into a pen, they may be pushed up against a gate, which the herder its attempting to close, but the important differentiation is that the gate is not slammed into the goats. So, this description will remain. For 2.1 many thanks for your input, we will ensure that the guidance makes it very clear that the requirements against all applicable indicators is now mandatory. The standard user will identify which indicators they wish to monitor for continual improvement and will be subject to verification of their own set targets with possible non-compliance raised if no evidence of improvement or lack of improvement can be provided.</p>	<p>Goats must be handled calmly, humanely and without excessive force. Goats must not be subject to abuse or mistreated in anyway including as a minimum: kicking, striking, tripping, slamming gates onto, throwing or dropping, dragging or lifting by their coat, tail, horns, ears, head, neck or back legs. Goats must not be chased or struck using whips, sticks, stones, or electric devices.</p>
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<p>26.6 – “Kids must be provided fibrous food from one week of age.” This I feel should be changed to “one month old”, because here our kids start consuming clover leaves and other leaf matter starting at around day 10, which of course contain relatively low amounts of fiber – so we start training them to take in roughage at around one month old, which helps with rumen development. What do you think?</p>	<p>26.6</p>	<p>The indicator wording has been updated. It will note in the guidance that this is only applicable to fibrous food, provided by the herder. If the kid is itself eating low fibrous foods, such as your example, this should not be stopped or considered not in compliance with the indicator.</p>	<p>Fresh fibrous food must be available for kids from an appropriate age.</p>
<p>Another matter is 26.11 – “Prior to kidding season adequate suppliers of colostrum must be available in case of emergency.” Colostrum could serve this purpose, but also dairy goat milk – the latter may be even better.</p>	<p>26.11</p>	<p>Thank you for your comment, whilst colostrum may not be available at short notice, the reasoning for this indicator is that appropriate planning is in place to that colostrum can be administered.</p>	<p>Prior to the kidding season, adequate suppliers of colostrum must be available in case of emergency.</p>
<p>21.5 – about bedding in barns – I think farms with adequate conditions can set aside/provide some bedding, though as for cashmere goat farming in Erdos here, herders tend to be accustomed to using essentially just manure for the same purpose in sheds, for insulation during cold winter and spring months. Manure is convenient to collect on the spot, while also fitting for local conditions, making it the popular choice. So I don’t think preparing dedicated bedding is a must – alternative methods are being used here. So changing the wording to</p>	<p>21.5</p>	<p>Many thanks for your comment. The guidance will provide context on when we expect bedding to be provided and under particular conditions.</p>	<p>Housings / shelters must have bedding or a suitable flooring which is dry, maintained at an appropriate level cleanliness, is sufficient to lie down and avoids discomfort.</p>



<p>“where conditions permit” would be more suitable</p>			
<p>My last point is 21.8 – I don’t think manure always needs to be removed on a daily basis; it depends on the situation. I feel like house-fed goats reared on top of fermentation beds should be cleaned once a day; but if we’re talking about barns, like the kind I mentioned that use manure as bedding, then they don’t need to be cleaned out on the daily.</p>	<p>21.8</p>	<p>Thank you, this indicator has been adapted to remove the need for a timeframe and has been amended to "as required." whilst dry manure is used as bedding / insulation, this indicator is applicable to wet manure.</p>	<p>Wet manure must be removed from housing / shelters as required.</p>
<p>First up is general impressions for the provisions of the Standard itself, which is where businesses have had the most to comment on. So we see that in Chinese, many of the provisions contain the word “must”, as in certain indicators have to be completed/achieved. However, some of these indicators while exhibiting positive intent may not be achievable by farms in practice, at least in present circumstances; this means that there needs to be a process of progressive improvement, so I hope that the Standard’s developers can take into consideration the wording of such, i.e. change some “musts” to “continuous improvement” – of course, these thoughts reflect the candid opinions of</p>		<p>The wording of must vs should makes it clear that the indicator is a baseline minimum requirement. The in-country guidance will be written in such a way that existing practices will be referenced, however it should note that in some instances standard systems such as the SFA are here to drive improvements and changes to existing practices, so whilst some farms may not currently be able to achieve these indicator requirements, the SFA will support them. It should be noted that if there is a legal compliance issue that is contradictory to the indicator, the SFA insists that local applicable laws are followed and non-conformances will not be raised against these indicators.</p>	



<p>many cashmere producers across the board as well.</p>			
<p>So in article 3.1 it's stated that the workforce must be trained or experienced and competent in handling animals, and must possess the ability necessary to maintain the health and welfare of animals – this is of course our ultimate expectation, hoping that each and every husbandry practitioner has access to this training, but right now the most we can say is we're doing our best to expand the scope and influence of said training, but it's an ongoing process. This is one aspect I'd like to make clear. This also relates to 3.3 which mentions that the workforce must participate in training on sustainability practices – this relates to the training side of things as well.</p>	<p>3.1 & 3.3</p>	<p>Thank for your comments. The guidance will detail the responsibility level and applicability for these indicators. The SFA do not expect that herder families are trained to ensure that they are suitably trained. This indicator will be applicable to large-scale production farms that employ external members of staff to work on the farm. They represent a need to ensure that they are suitably trained to handle and care for the goats.</p>	<p>3.1 - The workforce must be trained or experienced and competent in handling goats, and must possess and practice the ability, knowledge, and competence necessary to maintain the health and welfare of the herd. 3.3- Training materials are available on the SFA Cashmere Standard requirements, with a focus on key sustainability issues and best practices for the local context, and are disseminated to the workforce in the local language.</p>
<p>In article 4.1 we mention data management, where "The Producer must collect and maintain accurate and complete data on the organisation in the format required by the SFA, which must be updated on an annual basis, sooner if required." So concerning data, one issue may be that our cashmere producers and farms may not be clear as to the specific data that we aim to collect, and we might need to do a follow-up evaluation of everybody's</p>	<p>4.1</p>	<p>Similar to our response above, the guidance will detail the responsibility level and applicability for this indicator. Individual herders will not be required to collect and maintain this data, but Producer Organisations would be.</p>	<p>Producers must collect and maintain accurate and complete data on their organisation/farm and its members on an annual basis, sooner if required.</p>



<p>actual circumstances, because some data may only be obtainable from upscale, large-sized livestock farms, and difficult to obtain for herders. This of course warrants specific discussion depending on actual circumstances once we do a follow-up</p>			
<p>Decent Work, which relates to issues of rights, remuneration, and treatment of on-farm workers and management. Many businesses have had plenty to say on this as well, and I'll pick some of the key ones. One concerns the statement made in 5.2, where "The farm must not engage in or support the use of forced or compulsory labour, including prison labour, as defined in ILO Convention 29." So here everyone endorses the expressed meaning, aka rejection of labor sourced from prisons. But the wording itself, especially in China, may be relatively sensitive, because in reality, China does not employ criminally convicted, or incarcerated persons to perform this type of work, nor is it permitted, with legal restrictions for such in place as well. So concerning this word, when translating into Chinese, could we consider changing or modifying the term "prison labor". As an aside, the Standard text also makes frequent mention of rules set by</p>	<p>5.2</p>	<p>Many thanks for your comment. The SFA do not wish users of the standard to disregard local applicable law. This particular indicator is only necessary if there are no laws which ban the use of prison labour on farms. If such laws exist, then these must be followed as per indicator 1.1. However, if there isn't an applicable law on the uses particular types of labour then indicators such as 5.2 must be followed. We have adapted the indicators wording as suggested, this is due to the fact that the term "prison labour" is included in the definition of ILO convention 29.</p>	<p>The farm must not engage in or support the use of forced or compulsory labour, as defined in ILO Convention 29.</p>



<p>international labor organizations, which is of course done in consideration of our Standard’s intent to be applicable to many countries across the world. But assuming the Standard is to be implemented by itself in China, then there may be certain stipulations by specific labor laws concerning labor-related issues – so we should consider potential legal issues in China when developing Standard provisions.</p>			
<p>In 9.1, it’s mentioned that “Farms must acknowledge and adhere to legal rights of communities regarding sites, land, and other resources.” This may be a translation issue, where the expression isn’t very clear-cut. One point that bears emphasis is that domestically, farms may be different from other countries whose land is privately owned in the sense that in China there are only use rights to land, but said rights have an operating span where ultimately, rights... to give examples, we cannot build a house on top of it on a whim, or convert the land into farmland at will –</p>	<p>9.1</p>	<p>Many thanks for your comment. Legal compliance with local land rights and laws, regardless of their ownership, must be followed as per indicator 1.1. As an example, the risk that this issue is looking to mitigate is if a farm may be adding chemicals (knowingly or unknowingly) to local water sources. However, the local community has the right to clean water, which is gathered from the same source that the farm is contaminating. So, this indicator is to ensure that farms are considering their impact on the communities around them and (even though perhaps legally) not</p>	<p>Producers must acknowledge and adhere to legal rights of local communities regarding sites, land, and other resources.</p>



<p>there are domestic laws in place to restrict this. So this is something that needs to be considered when developing these provisions in the future.</p>		<p>conducting actions that may negatively impact those same communities.</p>	
<p>10.5 – it sets down eight specifications on maintaining workplaces, where the third one states “Clean and hygienic washing and toilet facilities commensurate with the number and gender of employees”, and the fourth, “Fire safety equipment and alarms.” These I imagine should be in relation to large-scale, factory-type farming models, because those would possess the building space and dedicated equipment that would warrant these fire equipment and employee-commensurate washroom facilities. As for herders, though, these might only be them and family members, or 1-2 hired labor, so their toilets might be very basic, and not separated by gender – since they don’t have many workers to begin with, this arrangement is good enough for their needs. So this clause may need to consider the practical conditions of small-sized herders.</p>	<p>10.5</p>	<p>Thank you for your comment, your assessment is correct this this will only be for large-scale farming sites, which must follow these types of requirements. The guidance document will clearly outline which indicators are applicable to particular users of the standard.</p>	<p>Safe and accessible potable and washing water facilities must be available.</p>



<p>– indicators on goat welfare, of which many also took reference from the Animal Welfare Code of Practice for Cashmere Goats published by ICCAW, and have been subject to comments by experts and businesses. Of these, indicator 23.10 mentions “Treatment records for goats should be kept and include at a minimum: a) substance administered (including herbal remedies) and reason for treatment.” It bears emphasis here that, domestically, when goats are treated for disease, the process is usually done by qualified veterinarians – unless it’s a common condition, in which case farm owners can take care of it themselves – they have the knowhow. But usually when vets administer the treatment, the records remain with the vets – doctors keep simple records of their own following their respective formats, which aren’t accessible to herders – so this is something to consider in practice. Herders do, however, usually mark their ill animals – if a goat is undergoing a few days of treatment for illness, for instance, they’ll set up an isolated quarantine for the animal and mark it with an ear tag or some other form of marking.</p>	<p>23.8</p>	<p>We have amended the wording to 23.10 to demonstrate that the records must be kept, but not necessarily by the herder. However, if the herder requests access or to enquire a particular detail in the records, such as the date of previous treatments, they must be able to access the records, so the vet must be amenable to this requirement.</p>	<p>Treatment records for goats should be kept or accessible if not kept by the herder and include at a minimum:</p> <ul style="list-style-type: none"> a) substance administered (including herbal remedies) and reason for treatment. b) the animal receiving the treatment c) date of treatment
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<p>23.13 which mentions “Farms must have a written welfare plan. The plan should be reviewed at least annually.” As it stands currently, written plans are present for all scaled factory-style farms, but in our field assessment for smaller-scale herders we’ve yet to see many make these plans. Now we understand that this written plan is an important component of the Standard for herders, and it’s something we’ve continually stressed in our training programs as well as endeavored to raise awareness with regard to herders, but based on current actual circumstances alone, the majority of farms cannot achieve this. So seeing as how the indicator is label as a “must”, we invite consideration as to its feasibility as a compulsory requirement.</p>	<p>23.13</p>	<p>Thank you for your comment. We have removed this indicator.</p>	
<p>25.7 – “Insemination records should be kept and tagged.” Based on feedback from businesses that perform artificial insemination, when the procedure is applied, no individual labelling is done – typically there’s a qualified team on site to carry out the insemination, who use a simple means of distinguishing animals – usually by way of dyeing an animal with a certain color, or some other form of labelling. Regardless, it’s</p>	<p>25.7</p>	<p>Even if the way of distinguishing the animal is simple, the SFA would consider this a “tag”. It does not need to be a complicated method of identifying which goat had been put through the process. We will detail this requirement in the guidance.</p>	<p>Goats must experience positive interactions with humans that build trust and promote calmness, confidence and compliant responsiveness within the herd.</p>



<p>hard to make the claim that goats are “individually tagged”.</p>			
<p>27.1 which deals with castration and states that “Castration must only be carried out where absolutely necessary and on goats younger than 8 weeks of age.” Feedback from businesses on this suggest determining the appropriate minimum age for castration based on weather and seasonal conditions. As in, if a kid is born around summertime, it’s practicable to keep the castration time to within 2-3 months of its birth; but if it’s born in winter, especially in regions like Inner Mongolia where winters are especially cold, then castration during that season would negatively affect the wound, which is why castration usually waits till spring, and by that time the kid is already a few months old – past the required 8-week window. So I think our experts and teams need to make an assessment to determine if there’s a more reasonable timeframe for castration.</p>	<p>27.1</p>	<p>Thank you, I have amended the wording to reflect this by noting that goats who must be castrated should be conducted on goats when absolutely necessary and the guidance will provide examples of these scenarios. Therefore, if it is not feasible to conduct castration on a goat within 8 weeks due to adverse weather, this is permissible. However, it will be noted in the guidance that additional considerations will be needed, such as pain treatments.</p>	<p>Castration must only be carried out when absolutely necessary from a herd management and welfare perspective.</p>



<p>Another question we have is about euthanasia – since this is a topic we’ve been heavily discussing and where a great deal of debate has been focused, namely, article 28.1 and all the others following it where euthanasia is mentioned. So here, businesses have presented generally uniform feedback in that there may be an issue concerning potential methods used to euthanize non-treatment-responsive sick goats, specifically, what tools should be used, and during what times. This is because certain tools deemed conventional for use during euthanasia, such as electric stunning equipment, prods, and sedatives, are regulated by law in China to the effect that they cannot be owned by individual farm owners – so we should take into consideration local laws once we start enforcing this Standard - adopt adaptive measures where necessary.</p>	<p>28.1</p>	<p>Many thanks for your insight. We will ensure that the guidance includes recommendations on best practice for lengths of treatment applications and when is an appropriate time to carry out euthanasia on a goat. The SFA will not make any particular process of euthanasia mandatory, especially where local applicable law, bans the use of such methods, however in the guidance and herder training the SFA will provide recommendations on appropriate forms of animal euthanasia.</p>	<p>Goats must only be euthanised if they are experiencing pain or sickness and have no prospect of recovery, have not responded to treatments or are subject to chronic suffering.</p>
<p>Meanwhile there’s also the entirety of article 29, from 29.1 to 29.9, where the term “working animals” are mentioned. For this term, I’m not sure if this is a translation issue, but cashmere goats are not considered “working” in China – they wouldn’t be used to plow fields as may be in the case for cattle, etc. – it’s not a plausible scenario, and there’s no</p>	<p>29.1-29.9</p>	<p>By working animals the SFA are referring to sheep dogs, guardian dogs, or other farm animals such as horses. The SFA does not deem a cashmere goat “working animal”.</p>	



<p>case to be made for cashmere goats being “working”. So this article should probably not apply to China.</p>			
<p>35.7, one article mentions that goats are not to be transported for over 8 hours – this timeframe is obviously in consideration of the physical conditions, stress and other factors pertaining to the animals involved, but it is worth noting that for some long-distance transportation scenarios, the trip would exceed 8 hours – and these special scenarios do need to be addressed. So in comparison with indicator 34.1, which says “For journeys over 8 hours, goats are provided water, feed, and rest according to their needs”, the latter feels more reasonable – perhaps indicator 34.1 can be retained in lieu of 35.7?</p>	<p>35.7</p>	<p>Many thanks for your comment. We have removed the indicator that requires that transport does not exceed 8hrs. As you noted there is a requirement where travel does exceed 8hrs the animal welfare must be considered on issues such as food, water and space.</p>	



<p>I'll tack on one point, just one: I think we here are mostly discussing from the academic side of things, but if we ever get into law – and this seems to involve international law, and state laws – aplenty, I feel there's need to consult with legal experts or government officials, ministries of agriculture, other relevant parties, because there's such a huge difference in animal laws, labor laws, so on and so forth, across regions, so I think there's a need here to consult with proper legal experts, if you want this to be enforceable. Other than that, about standard documents in general – and I'm not too clear about global standards, but domestic standards generally consist of those whose execution is recommended, and those that are compulsory. In essence, I think international standards serve as more of a guidance – meaning that it should carry a degree of flexibility.</p>		<p>The SFA does not create any obligation to contravene applicable law. If there is applicable law that means compliance with would contravene an SFA indicator, then no non-conformance issue would be raised. However, this will need to be demonstrated at audit that the applicable law is effective and that the indicator requirement is contrary to the applicable law. Both the SFA Cashmere Standard and guidance will include a disclaimer regarding the need to follow applicable law in the country or jurisdictions that the standard is being used in.</p>	
<p>So I have a comment on Criteria 4, which I feel the SFA should be made aware of, concerning the data format: 4.1 states "The Producer must collect and maintain accurate and complete data on the organisation in the format required by the SFA", I feel since each business has their own forms they use for production records, is it necessary to</p>	<p>4.1</p>	<p>By data "format" the SFA will stipulate whether this is a number or a percentage. Exactly how that data is collected, maintained and completed will be down to the user of the standard. The SFA will provide a template for data storage, but this is only a recommendation for those who do not</p>	



<p>have them all conform to the SFA’s data format? Or is it possible to change the wording of this statement? That’s all I wanted to say, thank you.</p>		<p>currently use one and its use will not be mandatory.</p>	
<p>Thank you to the presenters. I have a question to raise about what Mr Wang just said about data collection, because this is a question that got thrown around a lot for us in the last several days as well, and one concerning data, that everyone’s keen to hear addressed. Namely, after hearing your answer just now, and since ICCAW is in charge of conducting audits across farms in China, can I interpret your answer as – herein “the data” equates to the same data that herders are required to submit on a mandatory basis to our auditors or accredited third-party auditors during their on-site auditing process? Moreover, would the herders be required to submit any additional data, or data that may involve confidential info? Because this is a question that’s receiving an overwhelming amount of attention by stakeholders, so I’d like to be doubly sure.</p>	<p>4.1</p>	<p>Yes, this data is only applicable to the use and needs of the SFA. Within this there are indicators that we hope herders will find useful, but data outside the scope of the SFA will not need to be collected or shared. If the information is confidential, all auditors are subject to confidentiality agreements between the herder and the audit firm. The SFA similarly will treat all information received highly confidentially and it will be subject to the SFA’s data policy.</p>	



Removal of wet manure may not happen every 24 hours, for goats it could be longer between cleans.	21.8	Thank for your comment. We have addressed this by amending the requirement to be "as required". It should be noted that "as required" is applicable for the goats.	
calculate more feeding spaces than the number of animals - give different access depending on age - no more than 15 goats per individual water point - feed/water always available Include cleanliness of drinking water? - Maybe also check water temperature, especially to be sure that it does not freeze...	17.2	Many thanks for your comments, under 17.2 it has been amended to ensure that goats can access food / water without crowding, we can then provide within the guidance what that will look like for nomadic / large-scale farms. 18.1 refers to access to clean water at least one a day to have their fill. We can add to the guidance for non-nomadic farms with static water sources can monitor items such as water temperature, but for nomadic herds, who drink from local rivers / streams items such as water temperature may not be monitorable or controllable.	17.2 - Access to feeding and water points must be monitored such that all goats can eat and drink safely and without crowding. 18.1 - Goats must have access to clean, safe drinking water each day, with the ability to drink their fill.
allow kids learning from adult goats	17.5	Thank you, we will include in the guidance how learning from adult goats can one of the effective measures to ensure kids do not eat poisonous or harmful plants.	
BCS can be used?	17.6	We will include Body Condition Score within the guidance as an educational tool rather than a mandatory system that herders must follow.	



unclear	17.7	Under this indicator, 17.7 we refer to access to feed and water can only be restricted for reasonable management practices. In the guidance we will detail what they are. For example, this would be for impending vet treatment or surgery, in preparation of fibre harvesting. By writing the indicator in this way, it means that the guidance can specify, which are reasonable practices and then this can be country specific as well.	Goats access to feed and water must only be restricted for reasonable management practices.
what's the aim of this change of feed?	17.8	There is no aim to the change of feed. If the herders are changing feed due to restricted or limited access to their regular variety or type, or they are moving on to another type of regular feed, this must only be done so gradually.	
feed rack in the pen	17.9	The guidance will provide example of access to materials to browse for different production methods.	
extremely cold (below 5 degrees) - pay particular attention to abrupt changes of weather conditions - carefully evaluate cold morning or hot evening- goats could be kept indoor during kidding season if weather conditions are adverse	17.10	The SFA will provide a definition of "adverse weather".	



<p>goats should have access to water always during both day and night - during the cold season, drinking every 12 hours could be acceptable but not during hot season - water temperature should be carefully check: not too cold during cold season - avoid freezing; not too hot during hot season - avoid putting water under the sun</p>	<p>18.1</p>	<p>We have amended this requirement to remove the time limit on access to water. We received feedback from herders that when driving herds from their camp to a pasture and back again, where there is an appropriate water source may exceed 12hrs, so is not viable for them. It will be noted in the guidance though how access to water should be considered based on conditions such as hot and cold as well as other weather conditions.</p>	<p>Goats must have access to clean, safe drinking water each day, with the ability to drink their fill.</p>
<p>how is the artificial feeding of kids?</p>	<p>19.1</p>	<p>This can be done by herders who are hand rearing or if on a large-scale farm, and there are larger numbers of kids who need feeding, it could be done via a machine or apparatus. It will depend on the production method. For all scenarios, the SFA will require that the equipment used must be kept clean and is well maintained.</p>	
<p>i agree with this point but this depends on quality of pasture</p>	<p>20.1</p>	<p>Thanks for your comment, under 17.6 and 20.1 we believe that this ensures that regardless of the sources the goat should receive adequate and appropriate nutrition, if pasture cannot provide this then the herder must supplement this.</p>	



Definition of roughage? - 70% would be better	20.2	The guidance would provide more specific information regarding the definition of roughage as well as guidance on the % of this. We use this approach as the guidance can be updated as necessary with updated requirements or best practice.	
shelter from shade, sun and wind - protection from predators?	21.1	21.14 notes the need to protect goats from predators, it does not specify that this must be done by the use of shelters. We will amend the wording of 21.1 to include reference to predators.	Shelters and fencing (where applicable) must be designed, constructed, maintained and cleaned to prevent injury, infection, escape and attack from predators.
Thresholds suggested in Italy: Ammonia < 5 ppm CO2 < 2500 ppm H2S < 2,5 ppm	21.1	Thanks for your comment; we will include these figures within the guidance. As noted before, we will include this in the guidance document as these values may change, with applicable law or best practice.	
why? I think natural light is good enough	21.3	In some production systems, the only light sources available during cold winter months may be artificial, therefore the indicator requires that there is a period in which the light is dimmed to promote resting behaviour.	
bedding should be dry and clean - what are the available materials? - also depends on the flooring material	21.5	This indicator has been amended. The guidance will provide examples of appropriate bedding.	Housing / shelters must have access to bedding or a suitable flooring which is dry, maintained at an appropriate level of cleanliness, is sufficient to lie down and avoids discomfort.



slatted floor should be avoided	21.6	We concur, however some farms were constructed with slatted flooring, so we have included in the indicator that "All housed animals should not be kept on a slatted floor where possible."	The flooring for housed goats must provide good traction. Where possible, housed animals should not be kept on a slatted floor.
need for an infirmary pen for sick and injured animals	21.7	23.3 has been amended to include reference of being kept in a separate pen, however for nomadic herders, such pens may not be possible, therefore a "where possible" is included.	Goats must only be tethered or confined to crates following best practice, for long as is necessary and only to address special needs. Tethers and crates must be designed and maintained so as to not cause distress or injury.
depends on the type of bedding: if we use straw bedding (or similar) we can just add straw, if we have no bedding then we should remove feces every day.	21.8	This indicator has been amended. In Mongolia, herders use dry manure as insulation to keep the goats raised above the cold floor in winter. Therefore, the indicator is specific to "wet" manure. Additionally, we were advised that dependant on the size of herds, the need to removed wet manure is based on need. Therefore, we have removed the wording of "at least every 24hrs" and deferred to as required. In our guidance we will refer to the need for this to be completed more often for larger herds and to ensure that a level of cleanliness and comfort is maintained for the goats.	Wet manure must be removed from housing / shelters as required.
elevated platforms (e.g. niches) could be added to increase space and allow natural behaviour	21.10	We will include use of elevated platforms in the suggested environmental enrichments in the guidance.	



Include wind as well under Country guidance	21.11	This indicator has been amended to reference the need for windbreaks.	Goats must have access to effective shelter / windbreaks (natural or artificial) to protect them from adverse weather conditions.
need for training to herders?	21.14	SFA Mongolia provides training to herders as well as our in-country China partner, ICCAW.	
infirmary	21.15	Yes, this could be an infirmary. This is also applicable to the need for a separate pen under 21.7	
define excessive force - need for training of herders - can goats be lifted by front legs? - avoid shouting - include pain in desired outcome	22.1	We will include definitions of excessive force in the guidance and this will be subject of both herder and auditor training to identify.	
not clear to me 10hr minimum what is?	22.3	We have amended this indicator to note that goats should only be tethered for as long as is needed and only for specific reasons. The guidance will define what the specific reasons are / can be and also guidance on best practice for tethering.	
what are abnormal behaviours? - I would include oblivion/isolation from the group to assess sickness	23.2	We will include oblivion/isolation from the group within the guidance. The SFA will define abnormal as 'an unusual response to a set of motivational factors and stimulus'. A lot of abnormal behaviour can be regarded as stress-coping responses.	



checked every 6 months	23.5	We have adjusted the indicator to require 6 monthly checks.	
i understand but ear notching should be prohibited	23.6	We have removed the indicator that specifies ear notching.	
isolation should be avoided - guarantee contact with other animals, of course avoiding sanitary risk	23.6	Thank you for your comment. We have amended the wording of the indicator to ensure that isolation is considered and that they can only be "fully" integrated" to the herd once their quarantine period is over. We will provide guidance as to the avoiding sanitary risks but mitigating isolation.	Newly acquired goats must be quarantined for a minimum of 30 days from all other animals, avoiding complete isolation. They can only be fully integrated to the herd after they are confirmed as disease-free.
most of the indicators are recommandations - is it possible to insert few animal-based indicators?	23.13	We welcome recommendations on animal-based indicators, however these will have to be carefully considered to the understanding of the herders as well as the assurance training and methodology for validating the animal-based indicators.	
mortality should be recorded for different categories	23.14	Thank you, we will include this in the guidance on ways that mortality can be recorded.	
are kids early separated from mothers? Where deliveries occur?	25.1	The SFA does not require that kids are separated from mothers at birth. We provide more requirements on the treatment of newborns under criteria 26.	
doe=60-75% adult weight, > 12 months - buck=>7months	25.3	Thank you, we will include this information in the guidance	



		underweight and age of goats for mating.	
10 months is better	25.4	We will include this breeding interval within the guidance.	
predators and other stressors	26.1	We will add this reasoning to the guidance.	
at birth they don't need to be at sight/sound - only need of mothers (hider species)	26.2	We have amended the wording to ensure understanding as the expectation is that the kid remains with their mother, however it is beneficial that they are aware of the wider herd.	Newborns areas must be kept clean and dry with sufficient, appropriate bedding.
also attention to draughts	26.3	We will include draughts as consideration to keeping kids warm in the guidance.	
In Italy: 200 mL colostrum/kid within the first two hours; 200 ml/kg liveweight in the first 12 hours - important to consider the method of administration: if the kid takes colostrum/milk from the mother there is no problem. Otherwise, nipples should be used, and the head of the kid should be directed upwards, to facilitate the closure of the groove - avoid using bucket - are colostrum bank available?	26.4	Thank you, we will include this detail within the guidance.	
In Italy: a newborn is until one month of age	26.5	Thank you, we will include this detail within the guidance.	
also provide fresh water	26.6	The need to access clean, fresh water is under criterion 18. This will apply to kids as well, but we will ensure that this requirement is included in the guidance.	



Farmers should have enough knowledge and experience to monitor the deliveries and to provide the necessary assistance to the newborn (e.g. drying, massage, etc.). It is difficult to think about the presence of a vet for all births...	26.7	The wording to the indicator was amended and the need to include a vet was removed.	Producers must be sufficiently familiar with birthing and problems arising during birthing to know when to intervene and when to request assistance.
and from which animals comes	26.10	We have amended the wording of this indicator to include the identification and monitoring of problems occurring during pregnancy and birthing. The guidance will also specify this point as well.	Producers must identify and monitor the prevalence of problems occurring during pregnancy and birthing and take action if expected levels are exceeded.
>2 months	26.12	Thank you, we will include this detail within the guidance.	
why must be separated of their mothers? And from when?	26.13	This indicator has been removed.	
anesthesia and analgesia must be compulsory - performed by vet	27.2	The inclusion of professionally administered pain relief will not be possible for all herders, especially those who are nomadic. We can only put forward these actions as best practice.	
who evaluates the need for euthanasia? - If feasible, it would be great to have stunning and bleeding in a place which is separated from other animals	28.1	Recent evidence indicates that performing euthanasia in front of the other animals does not cause additional levels of stress. Thus, the SFA will not stipulate that euthanasia must be performed away from other goats. The need for euthanasia will be performed by the herder with the recommendation that they seek additional advice if uncertain.	



stunning compulsory - flags and paddles should be used to handle goats - avoid dragging or lifting - after stunning check for signs of consciousness before bleeding	28.2	Indicator 28.4 requires the use of stunning. We will include further information in the guidance regarding your comment.	
Mechanical methods: penetrative and nonpenetrative captive bolt. Electrical methods: head-only and head-to-body stunning. Head-only stunning short unconsciousness, immediate bleeding, > 1.0 A - Non-penetrative captive bolt guns restricted to animals < 10 kg - Avoid using exposure to CO2 at high concentrations	28.4	Thank you for your comments this will be added to the guidance.	
Vet guidance is essential if we are dealing with drug residues	28.5	Thank you for your comments this will be added to the guidance.	
include pain in desired outcomes	29.1	Many thanks for your input, we have amended the indicator wording include pain.	Working animals must be properly trained as to not cause injury, distress, or pain to other animals.
remove "are"?	29.4	This comment referred to previous version 1.5.1.4 before wording was rectified	
wind speed has to be carefully considered	31.2	Thank you for your comments; this will be added to the guidance.	
define too fast or hard - combing a goat may last until 1h	32.1	Thank you for your comments; this will be added to the guidance.	
animals should be used to humans before the practice occurs (extensively managed goats may experience more fear to humans)	32.3	Thank you for your comment; we will need to consider the impact of this indicator and how this can be verified via a standard. We will of course	



		include this in the guidance as recommended practice.	
training to combers/shearers	32.5	Indicator 31.1 references the need for competent personnel, with appropriate tools, which are well maintained to conduct combing / shearing. However, guidance will include the need to ensure that proper training for combers / shearers is available and completed prior to conducting any combing / shearing activities.	Fibre harvesting must only be carried out by competent personnel, using appropriate techniques and well-maintained equipment that minimises discomfort and risk of injury to the goat.
kids should only be transported after the umbilical cord is healed - include pain in desired outcomes	32.1	Thank you for your comment; we have made amendments to the indicator following your input.	Goats must be fit for transport. Goats that are sick, injured, unable to stand unaided, are in the last 2 months of gestation, kids whose umbilical cord has not healed, or are otherwise are at risk during transport must not be transported unless to receive medical treatment.
panting score and shivering score, see AWIN protocol	34.1	Thank you for your comments; this will be added to the guidance.	
check also the behaviour of stockman (avoid pushing, crying, sticking the animals)	35.2	Thank you for your comments; this will be added to the guidance.	
on the truck?	34.5	The requirements for longer journeys are included within indicator 34.1	



clarified what is "adequately designed" - is the vehicle always a truck?	35.6	We will ensure that the guidance includes design characteristics of the vehicle used to transport the goats, it may not always be a truck.	
Positive move towards including the five domains which also include the mental state of the animal. The five freedoms has been around for a long time, and it was a good model, but things have moved on.		Thank you for your input; we have received numerous comments about the move toward the five domains.	
With the inclusion of additional requirements such as Management and Decent Work the SFA must be mindful of not raising the cost of audits		It is very important that the SFA Cashmere Standard does not create a barrier to trade, therefore the applicability of newly introduced indicators will be carefully selected to ensure that only those who need to demonstrate compliance are required to do so and therefore mitigating the possibility of greatly increased auditing costs.	
We appreciate the use of the five domains.		Thank you for your input; we have received numerous comments about the move toward the five domains.	
Is it possible to include the use of the animal based indicators, such as body condition scoring which is not as open to interpretation to different assessors?		We will include Body Condition Score within the guidance as an educational tool rather than a mandatory system that herders must follow.	
Use of both euthanasia and slaughter in the same section is confusing and should be defined if both are to be kept		Thank you for your input; we will consult with experts to clarify our understanding, but in the meantime we will use the term 'euthanasia' and adopt Temple Grandin's definition of 'a	



		humane death that occurs without pain and distress”	
The use of bolts guns is a health and safety issue for users		Thank you for your input, we will ensure that reference to the use of tool in the stunning / euthanasia of animals is included within the guidance for health and safety.	
Long journeys more of an issue in China. How do/can farmers verify the qualifications/experience of subcontractors used for transporting live animals	34.7	The SFA will consider the scope of our Standard regarding live transport. Once animals are sold / handed over to a third-party transporter, their ability to influence or create mandatory practices are limited, especially in remote areas, where the availability of subcontractors for live transportation is severely limited.	
Standards look at the condition of the animal before transportation,		Thank you for your input; criterion 32 considers the condition of the animal prior to transportation and whether the animals are fit for transport.	
If the standard covers transportation, you would also have to take into consideration abbatoirs, which we would stay away from. Where would you stop?		Similar to our response to the scope of the SFA Cashmere Standard for live transportation, the standard users will have limited ability to influence set mandatory performance expectations However, the SFA can provide guidance on what herders should be seeking in their use of subcontractors.	



<p>Ad libitum roughage (grass, hay) is needed for good wellbeing of goats; Pasture access, however, does not necessarily guarantee ad libitum roughage due to production areas which have differences in vegetation period and months of degenerated or hibernating grasslands (or even snow coverage in high altitudes). To guarantee absence of prolonged hunger and physiological disbalance, additional provision of roughage is necessary for achieving good welfare states and counter acting large BCS and weight deviations throughout different seasons and reproductive cycles.</p>	<p>17.6</p>	<p>Thank you for your input; we will ensure that the guidance includes reference that pasture access does not mean that the goats have adequate roughage.</p>	
<p>Option 2 - pasture access necessary at all times ("Goats have access to natural pasture at all times unless emergency or severe weather conditions would otherwise negatively impact on their welfare.")</p>	<p>17.10</p>	<p>We have received feedback that in some areas, access to natural pasture lands is restricted by local applicable law due to pasture degradation. Therefore, we must ensure that the indicator is flexible to cover a variety of situations.</p>	
<p>Ad libitum water access is necessary – if water is not available ad libitum, animal welfare is reduced. Subordinate animals might not have a chance to sufficiently drink if provided with water only once or twice a day – ewes are especially sensitive here as they need enough water for production of milk.</p>	<p>18.1</p>	<p>We have amended this requirement to remove the time limit on access to water. We received feedback from herders that the time needed to drive herds out to pasture and to an appropriate water source may exceed 12hrs, so is not viable for them. It will be noted in the guidance though how access to water should be considered</p>	



		based on conditions such as hot and cold as well as other conditions.	
Should also be checked daily, along with water-quality checks	19.1	Thank you for your input; we will add the need for water to be checked daily into the guidance. The ability to conduct water quality checks will need to be flexible as access to sophisticated equipment for nomadic herder families will be limited.	
Ad libitum roughage would be ideal	20.2	Thank you for your input; we will include this within our guidance, however due to conditions such as adverse weather and access, we will be including a minimum % of roughage to permit ruminage.	
Missing: prohibition on tethering and individual keeping (unless for quarantine/vet visits etc)	21.1	Tethering is covered under indicator 22.3, which stipulates that tethering should only be conducted under very specific circumstances such as vet visits etc.	
Agree - combine into one: 'Housed goats have access to an area with dry, sufficient bedding to lie down'	21.5	Our reference to bedding has been adapted to ensure the indicator can be applicable to a number of different	



		scenarios, which the guidance document will then provide clarity on performance.	
Further definition on bedding would be ideal - bedding should be clean, dry, and soft	21.5	We will include a definition of bedding in the guidance documentation.	
Doelings 1	21.9	Thank you for your comment; we will add this to the guidance.	
This is not sufficient!!	1.2.1.17 (old)	This requirement has been removed.	
No to holding and handling by horns!	22.1	This has been added to criterion 22.1	Goats must be handled calmly, humanely and without excessive force. Goats must not be subject to abuse or mistreated in anyway including as a minimum: kicking, striking, tripping, slamming gates onto, throwing or dropping, dragging or lifting by their coat, tail, horns, ears, head, neck or back legs. Goats must not be chased or struck using whips, sticks, stones, or electric devices.
Simply stating compliance with local legislation is not enough (as it is commonly subject to change)	1.3.2.1 (old)	This requirement has been removed.	



No to earnotching - completely (contradictory to 1.3.7.3?)	23.6	Thank for your input; we have removed the recommendations on minimum ear notching. And will include in the guidance how this practice should not be recommended.	
With visual or audible contact to other animals	23.8	Thank you for your comment; we will add this to the guidance.	
Contradictory with 1.3.2.6 (but yes to prohibition!)	1.3.2.18 (old)	Thank you for your input; we have received numerous comments about the prohibition of ear notching and will be including this in the guidance.	
I know that it's not common, but a prohibition for Laparoscopic artificial insemination and electroejaculation	25.2	Thank you for your comment; we will add this to the guidance.	
Good!	26.11	We will be providing guidance on the amount of colostrum needed in case of emergency and suitability of other types of milks / fluids that can be used.	
Good!	26.12	The guidance will provide specific weight / age minimums.	



Ideally, with veterinary supervision + anaesthesia + analgesia	27.1	Thank you for your comment; the use of pain relief will be of course implemented where possible, however due to the nature of the nomadic herding families access to veterinary support will be limited, therefore we will provide guidance on how to conduct castration to best practice in a variety of situations.	
Dehorning and disbudding are prohibited in RWS (mandatory, not just a rec) - as it should be; along with tail docking.	1.3.7.4 (old)	This criterion has been combined into 27.4	De-scenting, disbudding, dehorning, and removal of goat wattles are strictly prohibited.
Ideally, no restraints are used	32.3	Thank you for your comments, I will add this to the guidance.	
A prior good (or at least neutral) human-animal relationship is necessary - ideally, there would be a desentization process for animals to get used to shearing etc	32.1	Thank you for your input; we have received similar comments about the human-animal relationship needed and included this into the guidance.	
No travel over 8 hours	34.7	Thank you for your comments; we have received a number of other comments noting that sometimes due to distances associated with travel in China and Mongolia, journeys will sometimes have to exceed 8hrs. Therefore, the requirements under criterion 34 must be followed.	
No restraints	1.7.3.3 (old)	This requirement has been removed.	



How does this correspond with 1.7.2.1? Contradictory	1.7.3.10 (old)	This requirement has been removed.	
Too vague	1.8.1.1 (old)	This criterion has been moved to the Effective Management Principle. Herders who are responsible for looking after animals are competent and experienced in animal husbandry. The SFA will include in the guidance expectations on competency and experience, however due to the familial composition, this competency and experience will be difficult and insensitive to raise non-conformances.	
Mongolia is special, cause almost all the herders herd all 5 types of animals. It might not be same as other countries. Probably in this section, other animals could be mentioned, maybe like appropriate ratio of sheep and goats etc.	24	Thank you for your input; the guidance document will reference the need for multi-animal herds with recommendations on ratios as have been provided.	
In farming systems, when goat is introduced, the farmer must confirm that goat is free from communicable diseases, and if necessary, they quarantine them for 30 days. So, a suggestion for 24.1 indicator, it could be like "In case of introduction of new goats, confirm that the goat is free from communicable diseases and other risks,	24.1	We consider this approach to be included within indicator 23.7.	



<p>and if necessary, quarantine them for 30 days”</p>			
<p>This indicator is already being used, but it is difficult to implement in some places. Mongolian herders usually agree on the breeding period, as the herders from soum same soum and bagh herd bucks together as a herd. Thus, this indicator could be changed to “Keep breeding herd separately apart from the breeding season”. It is hard for herders to keep breeding herd separately. The important thing is that herders should determine breeding season properly in spring, in order to receive offspring in a suitable time in the spring. It is not clear that keeping breeding herd separately means over all the year or just for the breeding season.</p>	<p>24.2</p>	<p>We were advised that keeping the breeding herd apart, except for breeding season was necessary to mitigate a number of issues, such as isolation or other animal stresses. We will consult further on this indicator.</p>	
<p>In this section, there are two indicators should be included, 1) “herders should select bucks only from locally adapted breed” and 2) “If herders want to do crossbreeding across different strains or breeds need to get a permission”</p>	<p>25</p>	<p>We will need to consult further on your recommendations, as we will need to confirm whom permission is sought on the crossbreeding. The need to consider local adaptability is already covered by indicator 25.1, however we will include in the guidance how preference should be placed on to locally adapted breeds.</p>	



<p>In this indicator there is another thing should be added. If goat is not meeting the breeding standard, the goat should be eliminated from the breeding. To be more specific, to select breeding herd the goats which didn't meet cashmere or other raw material quality or yield of 5 the breed should be eliminated from breeding. This kind of practice should be carried out every year.</p>	<p>25.4</p>	<p>Thank you for your input. We have adapted the wording of 25.1 to consider the fibre quality and yield into the suitability of breeding.</p>	<p>Breeding selection of goats must consider goat health, welfare traits and suitability for the environment.</p>
<p>In regards of goat welfare, the standard developers should be aware that Mongolian goats naturally become skinny in the spring to overcome winter. They approximately lose 25% of their weight. Will we assume that goat welfare indicator is met in this situation? There are harsh and cold winter and drought in summer, what would you say about goat welfare in these years.</p>		<p>The SFA and our approved Conformity Assessment Bodies are aware of the natural weight loss that occurs over winter and spring and this will be taken into account during onsite audits. We will also provide guidance to herders to evaluate the condition of their goat, including a Body Condition Score approach. With further knowledge on determining goat welfare, the herder can better prepare or adapt their actions to ensure that ultimately the goat is not suffering and their welfare is at the core of their work.</p>	
<p>Newborns must receive a sufficient amount of colostrum or milk, regardless of method within two hours of birth. Newborns must receive a sufficient amount of colostrum, regardless of method, within 24hrs of birth. – instead of feeding, use colostrum or milk</p>	<p>26.4</p>	<p>Thank you for your input. We have adapted the wording of indicator 26.4, however the use of milk has not been included as colostrum is critical for healthy development.</p>	<p>All kids must receive sufficient colostrum, whether by natural methods or manual assistance, within 24 hours of birth, with the first feed occurring within 2 hours of birth.</p>



In this indicator, you could mention that this operation should be done under control of veterinarians. The most important thing is that after the castration herders should follow the rule of vet hygiene.	27.3	We have included your reference to post-operation hygiene. We will include your comments regarding the use of a veterinary guidance and hygiene into the guidance.	Castration must only be carried out under suitable conditions by competent personnel, using methods that minimise pain and suffering, and include post-operative hygiene, observation and care.
It could be Livestock instead of Goats	28	The SFA needs to ensure that the scope of our standard is verifiable. We did consider the need to reference "goat" throughout the standard or use other terms such as livestock, animals etc. We decided upon the use of "goat" to support understanding and ensure that assurance is limited in its scope to reduce audit burden, costs and supporting information.	
There are three methods of proper disposal of carcasses, which includes burning, burying, and disposing hole or opening (more than 12 metres deep). This indicator should mention about "disposing the carcasses in a designated disposal zone or area", otherwise herders can't burn or bury the carcasses wherever they want.	28.6	Thank you for your comment, we have made amendments to the indicator and guidance following your input.	Goat carcasses are removed promptly and disposed of hygienically in a designated disposal zone or area.
This indicator say that "prior to slaughter", but it has to be clear. Prior means unlimited time before the slaughtering. There is certain period of time for bathing and injection contents disappear from animal body. Thus indicator can be	28.5	Thank you for your comment, we have made amendments to the indicator and guidance following your input.	Drug withdrawal must follow veterinary instructions to ensure any medication, treatment or injection content is no longer present in the goats body prior to slaughter, if the goat is to be used as food.



<p>“Drug withdrawal must be followed vet service instructions to ensure the medicine or injection content completely disappear from the animal’s body prior to slaughter if the animal is to be used as food.</p>			
<p>It is common that herders comb cashmere from goats on manure or soil. It is good to include in the standard that “herders must take all necessary actions to harvest dirt-free fibre.” What does “appropriate to the production setting” mean, apart from clean fibre (without external pollution like manure and sand).</p>	<p>30.1</p>	<p>“Appropriate to the production setting” means that dependant on the scale of the herding activities, i.e. a nomadic herder family through to large-scale static farm. Therefore, we expect that the approach that a different production setting will take to fibre harvesting must be appropriate to that setting. We have added to the guidance regarding the collection of dirt-free fibre. The guidance will provide further information on what those appropriate steps could be depending on the production system.</p>	



<p>11.1 Herders should understand the following:</p> <ul style="list-style-type: none"> • (i) importance of natural resources (soil, water, and biodiversity) for herders and their communities • (ii) how livestock husbandry affects soil health, water, and biodiversity and how these relate to each other • (iii) the activities they can undertake to conserve and improve natural resources on their rangelands 	<p>11.1</p>	<p>Thank you for your comment. We note your amendment for point (ii) to change "their activities" to "livestock husbandry". However, we believe that it should stay as "activities" as this will be different depending on the scale of their production system. As the SFA Cashmere Standard will be applicable to small and large scale herders. The activities taken by each will differ and it is likely that activities beyond just animal husbandry can affect soil health, water and biodiversity. We will ensure that requirements are appropriate for the user with clear guidance.</p>	
<p>Grazing pastures, including reserve pastures, should be identified and a schedule of seasonal grazing movements between pastures is agreed upon by herders.</p>	<p>12.1</p>	<p>Thank you for your comment, we have made amendments to the indicator and guidance following your input.</p>	
<p>Stocking rates should be appropriate for the pasture carrying capacity</p>	<p>12.2</p>	<p>Thank you for your comment; we have made amendments to the indicator and guidance following your input. The guidance will include more detail on how to estimate pasture carrying capacity based on the various factors.</p>	<p>Stocking rates must be appropriate for the pasture, reflect the importance of native species and take into account land type, pasture quality, seasonal conditions, class of stock and available feed resources.</p>



Locally relevant practices should be implemented to improve grazing resources for livestock and wildlife populations, including maximising palatable plant and cover and reducing the prevalence of weeds.	12.3	Many thanks for your input. We note your amendment regarding the reduction of weeds, however we received further comments that the removal of weeds can have a negative impact to the biodiversity and pasture health more broadly, so this indicator has been amended accordingly.	Locally relevant practices must be implemented to improve palatable grazing resources for livestock and wildlife populations, including maximising plant diversity and cover.
Measures must be implemented to protect water courses and wetlands (for example, use of buffer zones and proper storage of fertilisers and chemicals).	13.1	Many thanks for your input. We note your amendment regarding inclusion for buffer zones as an example, we have amended this indicator to reflect the needs for flexibility and have moved the examples of appropriate protection of water courses and wetlands to the guidance.	Measures must be implemented to protect water courses and wetlands.
Natural habitats and biodiversity must be conserved, and steps must be taken to enhance them over time.	13.2	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Measures must be taken to avoid unintended introduction of alien species e.g., through the transportation of natural resources like soil, plant materials, water, etc.	13.3	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Degraded areas must be identified, and steps are taken to restore them over time.	13.4	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further	



		amendments and agree with the indicator wording.	
Locally relevant practices should be implemented to minimise the risk of carnivore predation on livestock	13.5	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Corridors or routes used for the migration of wildlife across the farm/rangeland should be maintained.	13.6	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Locally relevant practices should be implemented to minimise the risk of dog predation and harassment of wildlife	13.7	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Natural water resources must be identified, and measures are taken to protect their source	14.1	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	



Locally relevant practices that minimise sedimentation of water bodies should be implemented	14.2	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Practices should be implemented to effectively manage climate change and increasing risk of floods and drought [climate change mitigation].	14.3	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Hazardous materials must not be disposed of on the rangeland unless specifically allowed by law and the affected land must not be used for grazing.	15.1	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Steps must be taken to restore areas damaged by hazardous materials	15.2	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Biological, cultural, and physical and other non-chemical methods are prioritised for pest control.	15.3	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	



Pesticides must only be used once a certain threshold of pest level is reached, that has potential to cause harm to livestock or the pasture. If pesticides are used, (hi) low toxicity active ingredients are preferred (ii) they are applied in a way to mitigate resistance.	15.4	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Pesticides must not be used if they are subject to any international bans.	15.5	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Pesticides and other hazardous materials must only be handled by people who are trained in their use, handling, are over 18 years of age and are not pregnant or nursing.	15.6	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Fertilisers must only be used when there is a demonstrable pasture need.	15.7	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
Fertilisers must only be applied when soil conditions allow uptake of the nutrients. Fertilisers must not be applied to frozen or waterlogged soil.	15.8	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	



The Rangeland Management Plan (RMP) must include a clear description of the rangeland managers, its users, and the legal status of the producer organisation.	16.1	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
The RMP must be developed with input from all herders within the producer organisation	16.2	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
The RMP must include a timeline for implementing its components	16.3	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
The RMP must include an annual monitoring, evaluation, and learning (MEL) plan.	16.4	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	
The RMP must consider the use of the rangeland by herders that are not members of the producer organization.	16.5	The SFA has confirmed with the respondent that they have submitted the wording of the draft indicator as confirmation that they have no further amendments and agree with the indicator wording.	



<p>The new Indicator '5.4' can be added, that will about working as much as possible. Also, it should be considered if over pressure and too much tired (country guidance can also provide). For example, determining the number of combing goats per person or a specific member of a household during cashmere preparation, and determining how many human resources are needed if necessary by harvesting season.</p>	<p>5.4</p>	<p>Under indicator 5.1, it requires that applicable laws are required, this would include working hours. However, we have added 5.4 will refers to any additional hours worked must be done so voluntarily. The requirement to make sure workers are not too tired and pressured to work (is covered under the health & safety criteria). We have added an additional indicator to 10.6 noting that working with hazards can stop or refuse to work if there is an imminent hazard.</p>	
<p>Translation in Mongolia should be reviewed by each criteria. Especially, for meanings and terminology should be vey clear in Mongolian and re-review the translation by an expert. Although this standard is voluntary, it should be written in such a way that it is understood that the main goal is how the herder can be happy.</p>	<p>Decent Work</p>	<p>Many thanks for your comment. Our translations will be conducted by a mixture of SFA Mongolia staff and independent translation experts who will support the SFA ensuring that all language translations are fit for purpose.</p>	
<p>The development Country guideline should be coordinate with the Labour Law of Mongolia. By the way, several versions of the employment contracts should be proposad as much as possible. As it is observed that assistant herders are often subjected to labor exploitation, it is</p>	<p>Decent Work</p>	<p>Many thanks for your comment. We will include as many examples of employment contract templates into the guidance and ensure that herders as well as those working in the cashmere sector in Mongolia are aware of their rights or where they should seek confirmation on their rights.</p>	



necessary to include methods to protect their rights.			
In the guidelines to be implemented in that country, it should be clearly stated at what level and by whom the indicators of decent work will be implemented. For example, if a cooperative or business owner is going to hire a herdsman to help with labor relations or household level, different instructions should be provided.	Decent Work	This is correct, the guidance will clearly identify the responsibility level and applicability for each indicator.	
To include the code of conduct and governance of cooperatives in the guidelines to be implemented in that country.	Decent Work	Many thanks for your comment. The SFA will consider the inclusion of a code of conduct and governance requirements of cooperatives into the guidance, however this whilst governance may be covered by local applicable law, codes of conduct can be variable and setting this into the guidance could limit what a cooperative of business were willing to implement. So, the guidance offered will be very high level.	
The differences between businessman and herdsmen should be explain very clearly in the country guidelines.	Decent Work	Many thanks for your comment. It will be very clear set into the standard guidance as to what the SFA define as a producer, a producer organisation and other businesses.	



<p>Regularly provide training information about new standards and country guidelines to Soum Government and their specialists. Furthermore, the cooperative will become the second government in the soum. In this way, the Soum Governor's Office and the cooperative will work together to disseminate information to the citizens.</p>	<p>Decent Work</p>	<p>Many thanks for your comment. The SFA, via our Mongolia team, work closely with herders and local government to ensure that we are providing the appropriate support and training. We will continue to do so and the implementation of the SFA Cashmere Standard will continue this approach as people will need to become trained on its requirements.</p>	
<p>Have a very professional review of the standard terminology. In the case of translation into Mongolian, use professional words that are in accordance with the laws of Mongolia. For example, according to the Labor Law, the word "employee" will be use another word by the law terms, the wording "prison labor" will be replaced with a more appropriate wording, and according to the revised provisions of the law on the labor of children over 14 years of age, it will be written that "working can be done with the consent of parents".</p>	<p>Decent Work</p>	<p>The child labour requirements are set out in ILO convention 182 and 190. These describe what is the "worst forms" of child labour. Under indicator 6.2 working can be done under consent as long as requirements are met, such as working outside of school hours and lessons.</p>	
<p>The guidelines to be implemented in that country will be implemented by a joint team of professional organizations and experts</p>	<p>Decent Work</p>	<p>The SFA works with dedicated teams of our own staff as well as in-country partners, ensuring that experts and other professional organisations are involved and supported in the implementation of the SFA Cashmere Standard.</p>	



When choosing a goat breed and strain, it is necessary to pay more attention to the fibre quality and welfare.	33.1	Thank you for your comments, we believe the wording under 36.1 reflects this by stating that "Breeding selection of animals must consider fibre quality as well as welfare and suitability traits."	
Organize the training and share the knowledge about best practice of good-quality cashmere goats breeding in the local area for each cooperative household.	33.2	We will include your recommendation into the guidance for this indicator.	
If herders do any breed improvement for quality of fibre they need to have a plan	33.3	Thank you for your comments; we believe the wording under 33.3 reflects this by stating that "Producers must adopt breeding improvement plans to improve fibre quality of their animals." The SFA will provide a template and examples of a breeding improvement plan into the guidance.	Producers must adopt a breeding improvement plan to improve fibre quality of their goats.
Fibre quality laboratory test should be required.	33.4	Many thanks for your comment. The SFA will add this to the guidance, however it will not be a mandatory requirement as the cost of testing may be significant as well as access to testing may not be broadly available.	
In order to know the quality of your goat cashmere, get feedback from the processors	33.4	Many thanks for your comment. The SFA will add this to the guidance.	
In order to become a supplier of high-quality fibres, herders should have breeding improvement plan with monitoring	36.5	Thank you for your comments, we have amended the wording for this indicator.	Herders must monitor the fibre quality of their goats to inform the breeding improvement plan.



How other co-operatives should adopt good practices for the preparation and storage of cashmere.	34.1	Many thanks for your comment. The SFA will add this to the guidance.	
If there is a mixed herd, the prepared cashmere should be sorted according to the color and age of the goats.	34.2	Thank you for your input. We have adapted the wording of this indicator to reflect your comments.	For a mixed herd, harvested raw fibre must be sorted by colour and by age of the goats.
In the preparation, storage and transportation of fibres in bags that should be made good materials.	34.3	Thank you for your comments; we believe the wording under 37.3 reflects this by stating that synthetic materials should not be used. Therefore, the SFA does not need to define what a "good" material is, however it is not synthetic.	
To read well and make correct composition so that the words are clear	Management	Many thanks for your comment. Our translations will be conducted by a mixture of SFA Mongolia staff and independent translation experts who will support the SFA ensuring that all language translations are fit for purpose, clear and that it is arranged in a logical way.	
Indicators should be named, who will be implement it?. Otherwise, it is not clear who will do it.	Management	The guidance will clearly identify which criteria / indicator is applicable to either the herder or the cooperative / business owner.	
Replace with standard language in translation.	Management	Many thanks for your comment. Our translations will be conducted by a mixture of SFA Mongolia staff and independent translation experts who will support the SFA ensuring that all language translations are fit for purpose.	



Standard translation do not use sentences with the suffixes in past participle. Must be in future sentences "will be".	Management	Thank you for your comment. We will ensure that translations are relevant and fit for purpose.	
It should be interact between other principles.	Management	Thank you for your comment. The guidance will demonstrate how the management criteria are inherently linked to other criteria within other section of the SFA Cashmere Standard.	
It is written in many terms such as producer, employer, members of SFA, herders, worker, etc. Who exactly will this standard apply to? If it is a cooperative, it should be entered as a cooperative, and if it is a herder, it should be entered as a herder. I want to put it in one word.	Management	Thanks for your comment. We will review the terminology used in the standard and standard guidance and ensure that the same and appropriate terms are used throughout.	
It is desirable to provide a good connection between groups of standards. How are you connecting with other indicators?	Management	Thank you for your comment. The guidance will demonstrate how the management criteria are inherently linked to other criteria within other section of the SFA Cashmere Standard.	
It is advisable to comply with the general requirements of Mongolian goats and the regulations established in the breeding areas of various animals. Also, the country guidelines should be relate with the Mongolian laws (Animal Genetic resources law in		Thank you for your comment. The guidance will be available in two initial versions, one for Mongolia and one for China, these will support applicable law understanding.	



<p>Mongolia) and standards are included in the clause and are measurable, it will be easier to evaluate later. If too general requirements are set, the question of whether there is a need for evaluation will arise. Therefore, it is correct to specify the indicators in detail.</p>			
<p>It is necessary to adjust the use of pastures to the carrying capacity. Therefore, to release livestock pastures from important areas for wild animal populations. Also, standard should be set not to use any internationally banned pesticides. The development of the Rangeland management plan should be include all comments of SFA cooperative member.</p>		<p>Many thanks for your comment. The SFA will add this to the guidance.</p>	
<p>In order to achieve the best quality of fibres, herders must adopt codes of practices, such in herders must minimize contamination and damage to cashmere during preparation, transportation, and storage.</p>		<p>Many thanks for your comment. The SFA will add this to the guidance.</p>	



<p>The participants expressed their support for livestock farmers to have voluntary standards to adhere to when entering into any labor relationship. This general principle includes the recommendations defined in Conventions 29, 182, 190 and 111 of the International Labor Organization. It is unique in that it includes measures to prevent forced labor, not killing others, and intolerable forms of child labor at the level of cashmere suppliers, cooperatives, and livestock farmers. In this way, the common principles of decent work have been created to be voluntarily implemented by cashmere producers and suppliers at the international level, the participants concluded on each principle.</p>		<p>Thanks for your feedback. It is great to hear that there is wider acceptance for the criteria and indicators being included within the SFA Cashmere Standard.</p>	
<p>Although herders are regarded as one of the key stakeholders of the textile supply/value chain, when it comes to decent work criteria, in my view the guidelines are somewhat blurry. It is especially true for raw cashmere/wool fibre producers or in other words – herders in Mongolia. This might partially be due to the fact that Mongolian herders do not breed livestock solely to produce and sell fibre, meat, hides for profit. Herders learnt to live in synergy with their natural</p>	<p>Decent Work</p>	<p>Thank you for your comment, we will ensure that guidance document includes a definition of “work” and “livelihood” with appropriate references.</p>	



<p>environment for thousands of years, self-reliant for food, clothes, transportation – in other words, it is their livelihood. Therefore, their everyday life practices eventually lead to the production of raw material making it difficult to distinguish between livelihood and work. This issue should be researched further to ensure herders are not left behind decent work standard criteria when it comes to sustainable development and just transition.</p>			
<p>If the Afghan certification process is successfully implemented the SFA will be operating under three different jurisdictions, Mongolia, China, and Afghanistan what provisions will the SFA make if there are large differences within these jurisdictions?</p>	<p>1.1</p>	<p>The SFA will provide in-country guidance to the SFA Cashmere Standard, supporting its implementation.</p>	
<p>Afghan goat herders are self-employed and are not part of any co-operative’s clusters or collectives in addition to which the majority are illiterate. What provisions are there to ensure that these herders understand the SFA Cashmere standard?</p>	<p>1.2</p>	<p>The SFA has successfully trained herders in Mongolia and China with varying degrees of literacy. Thanks to the knowledge gained from the development of these training programmes, we feel confident that we will be able to support the training of Afghan herders with the support of in-country partners.</p>	
<p>Will the USAID/ACEBA Stop shop concept, implemented by DCA, be the conduit through, which the herders can become de facto members of the SFA?</p>	<p>1.3</p>	<p>The SFA will need to review which is the most appropriate method of assurance regarding verification and compliance.</p>	



<p>What is considered to be the period of time allowed for 'corrective actions' and is this merit based?</p>	<p>2.3</p>	<p>Timeframes will vary; this will be based on severity of risk and appropriate response time considering resources, capacity and other factors. All corrective actions will need to be reviewed by the lead auditor to ensure it will be effective as well as proportionate for the nature of the identified non-conformance.</p>	
<p>What provision does the SFA have to provide the training plan in a form that illiterate herders can understand?</p>	<p>3.2</p>	<p>The SFA has successfully trained herders in Mongolia and China with varying degrees of literacy. Thanks to the knowledge gained from the development of these training programmes, we feel confident that we will be able to support the training of Afghan herders with the support of in-country partners.</p>	
<p>What provision does the SFA have to assist illiterate herders with the collection of data?</p>	<p>4.1</p>	<p>The SFA will ensure that herders are provided appropriate training on collection of data, further development and understanding of the Afghan cashmere sector is needed before we can commit to a particular approach or system.</p>	
<p>What is the qualification period, or criteria to be met, by a 'new herder' who does not have 10 years of records?</p>	<p>4.2</p>	<p>Criteria to be met by an individual herder will not include a need for record keeping, this will be more appropriate to cooperatives and businesses. A new herders need to demonstrate understanding and compliance with the SFA Cashmere Standard will be appropriate at the time of verification,</p>	



		but it will need to be set where the herder can demonstrate an understanding and compliance with requirements.	
Most herders are self-employed and do not have contracts of employment how will this be taken into consideration?	5.3	Contracts of employment will be a requirement of cooperatives or other businesses; individual herders are not required to have a contract of employment. Considering how literacy is a factor, the SFA will need to provide appropriate training to anyone who does employ or is employed to ensure that they are aware of their rights and other best practice approaches to employment.	
With reference to the above I have spoken with my colleagues in Afghanistan about 'local conditions' where those people who own just a few goats, collectively engage a herder to look after the goats on their behalf, and this is the response I got. There are two systems that are commonly adopted and are enclosed below: <ul style="list-style-type: none"> • Getting sheep or goat kids – The shepherd will be given one kid out of every ten delivered, the owners of the sheep and goats will take it in turn to 	8.1	Where herders are 'employed' by locals to look after goats on their behalf, we will need to ensure that the SFA Cashmere Standard is appropriate for such a scenario. Where there are such degrees of informality, it is likely that a transition approach will be needed to educate and create levels of understanding and to grow levels of performance and care for herders, who are working for locals.	



<p>feed the shepherd.</p> <ul style="list-style-type: none"> • GOMARI – local terminology, is where the owner of the sheep or goats look after the herds for a number of days or nights based on the number of sheep or goats they have – e.g., the sheperd with 20 animals will look after the herd for one night and the sheperd with 40 animals will look after the herd for two nights. The number of nights with the number of animals are correlated and set locally and will be different within different villages/areas. 			
<p>Afghanistan has been a conflict zone for over 20 years, and even longer if you go back to the Russian invasion of 1979 that lasted ten years. During the last 40+ years the infrastructure has been routinely destroyed by the guerrilla tactics employed by the Mujahideen and then by the Taliban. Herders will group together to try to create ways to store water and fodder, but these are very primitive and transient. Ironically the Taliban have brought stability but as they have been declared a ‘Rogue government’ they will not get loans or grants from the donor countries.</p>	<p>11</p>	<p>Any requirement will need to be appropriate to the local application, as noted before it is likely that transition periods will need to be established to enable transition towards best practice, but the SFA will take such requirements into consideration.</p>	



<p>Global warming, conflict and successive droughts have impacted greatly on the crop sector but because the areas where the cashmere goats graze are mountainous the goats will climb high up in the mountains to reach water. The Kuchis (nomads) who represent the largest proportion of herders will move their herds to where there is access to water but the Settle herders, those who keep their goats close to their villages, face the problems of water shortages.</p>	<p>Water Resources</p>	<p>The SFA won't raise non-conformances due to water resource access. The SFA will provide training on what is best practice for goat welfare for water and food resources, understand local conditions and work with herders to develop appropriate steps to move towards best practice.</p>	
<p>Rangeland Management Plan, in the case of Afghanistan will this be the responsibility of the USAID/ACEBA Stop shops and will the SFA prepare a visual RMP that can be understood by the illiterate herders?</p>	<p>16</p>	<p>It will need to be a collective effort for RMPs; not just for its planning, implementation, but also ongoing development and targets. Again, the SFA will ensure that training and development is tailored to its audience to support understanding as much as possible.</p>	
<p>Goats must be routinely monitored in addition to mortality rates morbidity rates should be recorded as they can illustrate patterns.</p>	<p>23</p>	<p>Thank you for your comment; we will add this to the guidance.</p>	
<p>The report refers to breeding selection as the catalyst to quality improvement. This is not strictly the problem, the micron, or fineness, of the cashmere fibre of the pure-bred goats in Mongolia and China are well within the parameters for what is internationally recognised as 'Fine' cashmere. The</p>	<p>36</p>	<p>Thank you for your comment; we will add this to the guidance. Breeding is just one element of improving fibre quality and considering the age, their welfare, how the fibre is harvested, stored and transported as well as other criteria aims to provide an improvement to fibre quality.</p>	



<p>overall increase in the average fineness of cashmere is related to ageing within the male goat population and an absence, particularly in Mongolia, of a coherent policy to cull the male goats at 3-4 years of age as was done in Soviet times. Each year the average micron increases as the male goats get older and nothing is done to control this.</p>			
<p>We believe that we should focus on how to increase the income of herders and set more standards, because the trend is that many herders have begun to reduce the number of goats and increase the number of farmers in Mianyang. We believe that this is because for herders, the income from raising goats is not as good as the income brought by raising Mianyang, which may have a lot to do with the price of SFA Cashmere International. This trend is not conducive to the sustainable development of goats.</p>		<p>Many thanks for your comment. The SFA cannot become involved in the pricing of cashmere due to the conflict of interest it raises. We will, however, work with herders to improve the quality of their fibre, which is then of a higher value on the market.</p>	
<p>First is to congratulate you for the thought that has already gone into this. Second, I would like to point out a general issue around indicators, the wording should be affirmative rather than suggestive for example "1.3. Producers must understand the requirements of SFA Cashmere standard." should rather be written in</p>		<p>Many thanks for your input; it will be that if the criteria and indicator are applicable for the user of the standard, it will be mandatory to demonstrate compliance. Users of the standard will then be allowed to select their own criteria and indicators as continual improvement indicators, which will be subject to verification.</p>	



<p>indicator language as "Understanding (Familiarity) with SFA Cashmere Standard requirements". This will allow you to score for example on a scale of 1 - 10. Another general comment is that there are loads of criteria but the standard could benefit from categorization of criteria, those that are mandatory, recommended and desirable, if this is not yet in place. This will ensure that the standard can reinforce the key aspects around livestock management, biodiversity, equity and community benefits as desired.</p>			
<p>the standard itself is clear enough but I would like to have a better understanding on the audit frequency at the different steps of the production, what organization will lead and what organisation will perform the audit. finally it is not clear for the me how these audits will be financed.</p>		<p>The audit frequency will be based on risk, therefore users with higher risks and instances of non-conformance will be subject to more frequent audits. The assurance manual will outline the audit cycle. Audits at the herder level will be financed by the SFA, through membership fees.</p>	
<p>In 2.1, it mentions that the producer must monitor performance and progress against mandatory and improvement indicators. What are the mandatory and improvement indicators respectively? Does it mean all the indicators in the standard? If not, how to tell the difference between these indicators? I saw some indicators</p>	<p>2</p>	<p>Many thanks for your comments. The requirement of mandatory / improvement have been removed to just mandatory, if applicable. Indicators for continual improvement will be amended so that users can select their own and be monitored against them.</p>	



<p>wording with must and some with prohibited. Are those mandatory indicators? How about those with "shall"?</p> <p>In 2.2, it only mentions Herders must ... So this indicator only applies to herders? How about the other "producers"?</p>			
<p>Indicator 3.3 mentions "must participate in training". Can this be internal training or only external training counts? Is training certificate required? Can we be more specific on such indicator?</p>	3.1	<p>Thank you for your input. Training can be internal or external, there won't be a need to require a certificate. Compliance will be demonstrated by keeping examples of the training provided and a register of those who attended.</p>	
<p>In 4.1, it mentions that "the producer must collect and maintain accurate and complete data on the organisation in the format required by the SFA". What data and what format? Can't find further guidance or explanation. It will be good that this point can be more specific.</p>	4.1	<p>Further information on this will be provided in the guidance. The data will be evidence of compliance with the SFA Cashmere Standard, so this can be in a variety of formats. The format of such data will not be tightly defined, as this will be dependent on the user.</p>	<p>Producers must collect and maintain accurate and complete data on their organisation/farm and its members an annual basis, sooner if required.</p>
<p>Natural resource protection can also be important to factories which consume large amount of water and energy. Shall we also consider similar indicators for those factories/producers?</p>	11	<p>Thank you for your comment. The SFA will consider the applicability of similar provisions for factories downstream users of the standard.</p>	



<p>In the Scope of the standard, it mentions "the 'Producer' is the term chosen to define the unit of licensing and can be either an individual herder, a Producer Organization (PO) (a group of herder households), or a large farm". Does it mean this standard only applicable to herder and farm but not to manufacturers (like fiber processing, woven, or final product producers)? But under the section of "Why is the standard being reviewed", it mentions that this Standard will be consolidation of three codes of practice including clean fibre processing. So this is a bit confusing. It will be good to make it clear what is the scope and to which stakeholders in the value chain this standard is applicable to.</p>		<p>The clean fibre processing code of practice will remain in place. This SFA Cashmere Standard will do as far as the traders prior to primary processing in its scope of applicability.</p>	
<p>For fiber management indicators, only herders are mentioned in the criteria. How about the producers which handle fiber processing? Shall we also include indicator for those producers regarding fiber management?</p>	<p>37</p>	<p>The Clean Fibre Processing Code of Practice will remain in place and therefore cover processors for the fibre management. This SFA Cashmere Standard applicability is to traders prior to primary processing.</p>	
<p>"35.7 Goat transportation must not exceed 8 hrs." However, indicator 34 infers it can exceed 8 hrs.</p>		<p>Thank you for your comment, this has been corrected in the standard. Journeys can exceed 8hrs, but there are expectations on goat welfare for journeys that exceed 8hrs.</p>	



The terms that were used in the indicator are kept very general (1.2 "procedures" - what kind of procedures?). Is there someone available who can support the farm/herder to create such plan?	1	Thank you for your comment, we have removed this indicator.	
Who is in charge of creating such improvement plan?	2	This will be at the cooperative level and above, as the SFA will not be expecting individual herders to create and implement improvement plans. Continual improvement indicators will be selected by the standard user and managed through auditing. Supporting information on applicability and implementation will be provided in the guidance.	
What are appropriate activities for children? Are the farm workers and herders familiar with the ILO convention?	6	Training will be provided on issues such as those under the age of 18 and working. The SFA will defer to the guidance of describing what are harmful activities for children as per ILO conventions, rather than appropriate activities.	
Is there any measurement or maybe a anonyme platform where workers can give feedback about their working conditions? Any responsible person where they can go to report about discrimination, abuse, ...?	7	Many thanks for your input; this will be part of the guidance in that mechanisms of which issues can be reported will be included.	



These sound like very important indicators – why does it say herders “should”? I think this knowledge founds the basis of sustainable rangeland management.	11	The use of should within this indicator is to permit the varying levels of education, literacy and understanding as well as applicability to production methods. Whilst training and guidance can be provided on biodiversity, soil, water health and further rangeland stewardship requirements, using a stronger term such as “must” would create too high a level of compliance that may not be achievable.	
It sounds like Indicator 11 is a must in order to fulfill the criteria here. I assume that these indicators will be clarified in the country guidelines (e. g. , "locally relevant practices", how to define "appropriate stocking rates", ...)	12	Thank you for your input, the SFA will be developing country specific guidance, initially for China and Mongolia. The guidance document will detail expectations on compliance and provide further information.	
Also here, I hope there will be more specified country guidelines (especially concerning the rangeland degradation)	13	Thank you for your input, the SFA will be developing country specific guidance, initially for China and Mongolia. The guidance document will detail expectations on compliance and provide further information.	
Does pesticides also include rodenticides, insecticides and herbicides?	15	The definition of pest will be detailed in the guidance. The term pest has been used here as an overarching term that includes all types of pests that are applicable to herders.	
It could be included that special care must be taken when it comes to does in their late pregnancy stage as well as to lactating does, as they demand special	17	Thank you for your comment. This will be added to the guidance.	



requirements concerning energy and protein levels, but at the same time they may face challenges such as Calcium deficits and stomach acidity			
Maintaining the body condition of goats may be a problem in Mongolia, especially during the winter and early spring time. What, if the rangeland does not provide shrubs and bushes? The term "roughage" in the diet could be specified, e.g., the ration should not exceed 40 % of concentrate feed, or crude fibre should be at least above 18 % ... these requirements should be considered in the feeding management plan	20	Thank you for your comment. We have been provided a variety of feedback concerning roughage in the diet and percentage levels on the maximum / minimum of goat diets. The SFA will consult further on this to ensure any expectations are achievable and based on best practice.	
What if all goats are kept on slatted floors? Does it mean that this farm cannot be certified? Can you define minimum space, e.g. every goat needs at least one resting and one feeding space, or X m ² /goat? 21.15. I think pregnant goats in a very late stage should be included here, too.	21	Keeping a goat on a slatted floor will not result in non-certification. The use of slatted floors is not recommended and special care must be taken considering the welfare of particular goats, such as heavily pregnant does. The guidance will detail recommendations on space available to goats on a m ² description.	
This is very important - are there any means to control or measure this? E.g., assessing lesions or behavioral disorders, ...	22	Behavioural disorders for goats will need particular care and not result in their permanent tethering, however permitted exceptions for tethering will be considered, such as medical examinations. Guidance will be provided for definitions and exceptions.	



I find it very good, that a veterinarian has to visit the herd at least once a year to review animal welfare By whom must the goat's hooves be checked? Is it by a vet or does the person need to fulfill any requirements (e. g., training)? 23.6 in my opinion, there should be the requirement to use plastic tags instead of marking the animals by amputating parts of the ear.	23	Goat hooves must be checked by the herder at a minimum, if they discover issues that they need assistance, they must seek a vet. This will be detailed in the guidance document.	
here, maybe the prohibition of uncontrolled mating could be included, too (to prevent overstocking and to further improve the herd's genetics)	25	Thank you for your comment. This will be covered by a number of indicators such as castration and keeping breeding herds separate, except during breeding season.	
I think the castration process would need some clarification in the country guidelines (e. g., use of painkillers, animal-friendly technique, requirements that the person needs to fulfill, ...)	27	Thank you for your comment. This will be added to the guidance.	
From my perspective, it should be included that dogs need a shelter to prevent them from being exposed to harsh weather events (such as storms, extreme cold, ...)	29	Many thanks for your input. We have adapted the indicator to include a need to provide shelter / protection from harsh weather.	Working dogs must have a sleeping area that is not on bare concrete or metal and have access to suitable shelter / protection during adverse weather conditions.
32.5: add a "s" to herder"s"	32	Many thanks for your input. We have adapted the indicator.	Producers must monitor the injuries obtained during fibre harvesting and take appropriate steps to improve fibre harvesting practices.
It is expected to combine this performance with the 35.7th benchmark.	34	Thank you for your input, we will look into the combining of criteria 34 & 35.	



To clarify how the understanding was satisfied. At what level should policies be implemented to protect livestock health?	1	Livestock health policies will be at the herder cooperative, medium/large scale farm level. The SFA will not expect individual herder families, small scale farmers to have policies in place.	
7.4. Additional workplace training and information distribution	7.4	The need to be provided training and information regarding working conditions and conduct will be detailed in the guidance.	

