



01 DECEMBER 2024

# SUMMARY OF CHANGES

SFA ANIMAL FIBRE STANDARD



SUSTAINABLE FIBRE ALLIANCE

# Purpose and scope of this report

This report details the following for the 2023-24 consultations on the SFA Animal Fibre Standard v1.0 (hereafter, the Standard):

- Background to the review of the SFA Cashmere Standard;
- Outcomes from the review (Summary of Changes);
- A stakeholder engagement report.

It is the goal of SFA consultations to be authentic, fair and inclusive, to provide secure strategic insight and to build consensus and credibility. Our core principle is that consultations should be useful to the SFA in achieving its mission and useful to the participants in seeing how their views are considered. To achieve this, the SFA's processes for consultation strive to follow the [ISEAL Standard Setting Code of Good Practice](#) as per the [SFA Standard Setting Procedure](#).

ISEAL requires that participation is open to all stakeholders and that the standard setter proactively seeks contributions from disadvantaged stakeholder groups. This is to ensure that contributors represent a balance of interests in the subject matter and in the geographical scope to which the Standard applies.



# WHY A REVISED STANDARD?

## Background

The SFA Cashmere Standard covers the biggest market share for certified cashmere. It is the only cashmere standard that aims to improve goat welfare, safeguard biodiversity and land, promote decent work and enhance fibre quality through an effective management system and assured chain of custody.

[Version 1.0](#) was published in January 2023 following an extensive revision and multi-stakeholder consultation throughout 2022. You can learn more about the development of v1.0 and the comments received [here](#), but that revision primarily involved the global integration of national-level standards and the addition of requirements for decent work and improving fibre quality.

## Persistent debate about an issue

Since the publication of v1.0, some stakeholders have raised concerns that the animal welfare requirements may not meet evolving consumer expectations. We believe that development triggered what is now clause 6.5 of the ISEAL Code of Good Practice: *“Where substantive, unresolved issues persist [...] the scheme owner carries out additional public and/or targeted consultation, as necessary.”*

## Way forward

Accordingly, the SFA pushed back the transition deadline for the SFA Cashmere Standard v1.0 until after further development work could be done. The SFA has reviewed considerable feedback received since then to develop the [SFA Animal Fibre Standard v1.0](#), which was published in December 2024.

Any other concerns or comments regarding the SFA programme that are outside the design of this Standard should be lodged through the [SFA Open Consultation Portal](#).



# Outcomes

The Standard replaces the SFA Cashmere Standard v1.0. This section outlines how v1.0 of the SFA Cashmere Standard Fibre Standard differs from this Standard, specifically highlighting where changes were driven or affected by feedback received through consultation. Those changes that were influenced by consultation are given first. A summary of other feedback is found later in Annex 1: Stakeholder Engagement Report. For more information on how the new Standard works in full, please read the Standard itself, which you can find on the [SFA Resources page](#).

While the new Standard has been restructured to allow other animal fibres to be included, v1.0 still only covers cashmere. For simplicity, this report still discussed changes in terms of 'cashmere' and 'goats', rather than 'animal fibres' and 'fibre-producing animals'.

## Summary of Changes

### Revised requirement(s) regarding stunning before slaughter

The SFA believes that stunning, when done correctly using the right tools, provides the best welfare outcomes when slaughtering animals. However, consultation revealed concerns around the requirement that all animals are stunned before slaughter, specifically that (a) stunning done by incompetent persons forced to stun using inadequate equipment instead of their usual traditional practices could lead to worse outcomes for animals and (b) forcing domestic sites to own and keep on site bespoke slaughtering equipment puts children at risk. In order to mitigate these concerns, we are implementing the following requirements, which expand upon existing requirements such that we believe pain and distress are minimised for all fibre-producing animals, especially those being slaughtered as a group, while balancing concerns about stunning equipment being brought into the home and/or used incorrectly in lieu of practised traditional methods. We have also included stunning in all situations as an improvement indicator.

- 18.1 Where the majority of their fibre-producing animals' nutrition comes from fodder, where more than one fibre-producing animal is being slaughtered at a time and/or slaughter is being done for the purposes of culling or commercial meat production, the site **shall** only slaughter fibre-producing animals using methods that stun the fibre-producing animal before slaughter, causing a rapid loss of consciousness that is expected to last longer than the process of slaughtering.
  - 18.1.1 The site **may** stun fibre-producing animals before slaughter using methods that cause a rapid loss of consciousness that is expected to last longer than the process of slaughtering.
- 18.2 Whichever method is used to slaughter the animal, the site **shall** ensure that slaughter is only done by competent persons using equipment that is clean and suitable.
- 18.3 Whichever method is used to slaughter the animal, the site **shall** ensure that it is reliably rapid and effective.
- 18.4 The site **shall** ensure that fibre-producing animals to be slaughtered are unaware of their slaughter up until slaughter commences.
- 18.5 The site **shall** ensure that fibre-producing animals are unaware of any other conspecifics having been slaughtered recently nearby.

- *This means the animal shall not see the act or residual effects of slaughter in the lead-up to their own slaughter.*

18.6 The site **shall** not sell fibre-producing animals for international slaughter.

## Revised scoring mechanism for continual improvement

Previous SFA codes of practice governing cashmere production followed a medal (gold, silver, bronze) system for scoring. When these codes were combined into the SFA Cashmere Standard, a new pass/fail system was implemented, where entities needed to pass all requirements for certification. This raised the bar for entry to the programme considerably, potentially excluding some entities that the SFA intends to keep. Consultation revealed strong support for the proposed approach, which will be implemented as follows.

Section 7 (Continual Improvement) of the revised Standard more explicitly defines the minimum performance expected of entities (i.e. all the requirements defined by “the [entity/site] shall”), which includes a requirement to show ‘continual improvement’. Some of the requirements from v1.0 of the Standard are now explicitly defined as ‘improvement indicators’ (i.e. those defined by “the [entity/site] may”); it is these that an entity may choose to meet in order to show ‘continual improvement’. Once an entity has met all of these improvement indicators, they are exempt from having to show continual improvement and are able to claim that they have met ‘SFA Best Practice’, a prestigious claim reserved for the higher-performing entities. Furthermore, some of these improvement indicators can only be achieved by land-based extensive systems (i.e. not industrial operations), meaning that the best claims are reserved for the production system that the SFA is most wanting to promote and support.

## New requirement to prove land tenure

The SFA Animal Fibre Standard v1.0 includes a new requirement (8.1) for sites to prove they have the right to operate on the land they use. Consultation produced no criticism of this new requirement.

## New exemption giving precedence to local law

The Standard now includes an exemption (1.2) that, where the Standard contradicts local law, local law shall take precedence. Consultation produced no criticism on this requirement.

## Clarification of minimum breeding ages

The SFA Animal Fibre Standard v1.0 now defines (at 18.2) the minimum ages at which goats shall be used for breeding (12 months for females and 18 months for males). Consultation resulted in the age for males being raised from a proposed seven months to 18 months.

## Removal of requirement limiting slaughter to euthanasia

The SFA Cashmere Standard v1.0 contained the following requirement: *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.* We have removed this requirement as unreasonable. Our justification is that slaughter for personal consumption or sale is an inevitable part of animal agriculture, especially for largely self-sufficient small holds. Consultation produced no criticism of this new requirement.

## Removal of requirement on quality of goats for consumption

The SFA Cashmere Standard v1.0 contained the following requirement: *If the goat is going to be used as food, drug withdrawal prior to euthanasia must follow veterinary instructions to ensure any medication, treatment or injection content is no longer present in the goat's body.* We have removed this requirement as it is out of the scope of the SFA Cashmere Standard; it does not fall under any of the five principles defined within the Terms of Reference of the Standard (i.e. biodiversity and land use, decent work, animal welfare, effective management or fibre quality improvement). Consultation responses noted that this is an important issue but agreed that it was out of the scope of the SFA Cashmere Standard.

## New requirements defining an entity

We have included new requirements for defining entities and their sites at section 3: Entity Structure. This clarifies who can be certified and illustrates how entities and their sites succeed or fail collectively, as per section 28 of the [SFA Assurance and Certification Manual v2.0](#). Consultation produced no criticism of this new requirement.

## Competence of workers

Multiple requirements in the SFA Cashmere Standard v1.0 contained a requirement that medical treatments, such as vaccination, castration, etc., were carried out on the advice of a veterinarian. We have made many of these requirements improvement indicators but have made following manufacturers' instructions a minimum requirement to compensate (Section 5: Hazards). We believe it is more feasible for producers to comply with this, while remaining clear on the SFA's intent with these requirements: to encourage that goat welfare is maintained during these activities. Consultation revealed some concerns that attending training should be a requirement rather than an improvement indicator, and we have logged this for consideration in the next review of the Standard.

## Clarified definitions of entities and sites

Certification against the SFA Animal Fibre Standard is indicated by a scope certificate, which defines the range of operations covered by any given scope certificate. The scope certificate is held by an 'entity' such as a producer organisation or buying house, which is associated with one or more sites actually responsible for producing the cashmere. While an entity and its sites may be different organisations, the scope certificate makes them collectively responsible for their certification. The entity and its sites fail or succeed together. For example, if one site receives a non-conformity against the Standard, all sites in the entity receive the same non-conformity. Consultation produced no criticism on this new approach.

*More information on defining scope certificates and non-conformities can be found in the [SFA Assurance and Certification Manual](#).*

## Clarified responsibilities for entities and their sites

Every requirement and improvement indicator now explicitly states whether it is the entity as a whole or individual sites that are responsible for meeting that requirement. It is hoped that this will lead to greater accountability while eliminating duplicated effort. Consultation produced no criticism on this new approach.

## Exempting some sites from irrelevant requirements

Some of the requirements related to decent work are designed with more industrial operations in mind. Accordingly, we have put conditional exemptions on some (but not all) of the requirements relating to labour that are designed to govern employer-employee interactions, which are less relevant to domestic operations. Accordingly, sites whose workers are all members of the same family household are exempt from some requirements. Consultation produced some concerns that family households could still be guilty of indecent work practice. We believe this is unlikely to be of concern but will be monitoring the situation.

*To easily find the clauses for which households are exempt in the Standard, search for "households".*

## Closure of loopholes through specificity and removal of jargon

Some of the requirements in the Standard were abstract and/or open-ended. These sorts of requirements can lead to inconsistent assessment outcomes, where different entities with similar operations using different CABs may receive different assessment outcomes. Accordingly, we have taken this opportunity to eliminate jargon and be more explicit in our intent for all requirements. Consultation produced no criticism of this new approach.

Examples include:

- Knowledge and understanding requirements into training. Relevant clauses can be found at section 4.
- Record keeping. Relevant clauses can be found at section 6.
- ILO and other UN definitions.

## Simplification through elimination of redundancies

Duplicative and redundant requirements lead to increased auditing fees and avoidable burdens on certificate holders. The SFA has taken this revision as an opportunity to streamline the Standard. Consultation produced no criticism of this new approach.

Examples include:

- Hazardous materials use and disposal. Relevant clauses can be found at section 5 and 22, and clauses 6.1.a, 13.2 and 13.3.
- Protection of water resources. Relevant clauses are found at clauses 12.3, 12.4 and 12.5.
- Respectful tenure. Relevant clauses can be found at section 8 and clauses 6.1 (g).
- Continual improvement. Relevant clauses can be found at section 7.
- Merging of requirements for the protection of catchments and wetlands from erosion, contamination and sedimentation (12.3).
- Merging all requirements to do with the nature of the relationship between handler and goats under one requirement (14.1).
- Removed 'or nursing women' from 10.8 c) as it is redundant with 10.9 b).
- Removed 'as well as welfare and suitability traits' as this part of 26.1 is redundant with 23.1.

- Moving entity-level record keeping and evaluation requirements to one space (section 6).

## New Country Guidelines templates

The Standard is intended to be applied globally, with the same basic requirements for all entities, whichever country they are based in. However, as local context may influence how a requirement applies in practice, the SFA has created a template for 'Country Guidelines' – a supporting document that provides entities and CABs with guidance on how the requirements might be applied in that country. It is expected that Country Guidelines for Afghanistan, China and Mongolia will be launched alongside the revised Standard, with more to be published over time. Examples of subjects covered by Country Guidelines include:

- Access to infrastructure, such as potable water, electricity and internet;
- Local ecological context, such as threatened and locally invasive species;
- Prevalence and access to technology, medicines and cashmere-harvesting techniques;
- Presence of local and protected communities, such as indigenous peoples;
- Identification of who is responsible for the management of rangelands;
- Any other risks common to that country.

Consultation produced no criticism of this new approach.

## Restructure to allow other animal fibres in future

The SFA Animal Fibres Standard v1.0 currently covers cashmere only. Editorial changes have been made that will facilitate the incorporation of other animal fibres (likely to include camel, yak and horsehair) in the future.

## Transition timelines

SFA scope certificate holders will have time to adjust how they produce 'SFA Certified' fibre. In practice, this means that scope certificates may still be issued against older versions of the Standard until 1 April 2025. Any existing scope certificates that were issued before that date will be valid until they expire, after which the entity will need to be certified against the new SFA Animal Fibre Standard v1.0. Consultation gave no criticism of this timeline.



## Integration with SFA Chain of Custody Standard

The SFA Chain of Custody Standard was recently reviewed and a new version published on 1 April 2024. A summary of the changes made as part of that review can be found [here](#), but the most relevant point is that it explicitly covers how producers are expected to control and trade the 'SFA Certified' fibre that they produce. In practice, this means that entities (and their sites) that are seeking certification against the SFA Animal Fibre Standard must also be certified against the SFA Chain of Custody Standard. This means considerable additional scrutiny on the producer links of the supply chain. Consultation produced no criticism of this integration.

More information: [SFA's Chain of Custody Guidance for Tracking Certified Cashmere Fibre Supply Chain \(sustainablefibre.org\)](#)

More information can be found at the section on Effective Dates in the [SFA Animal Fibre Standard v1.0](#).

## Changes to the SFA Chain of Custody Standard

To meet repeated requests for a framework for using the SFA logo on General Claims, we published v1.1 of the SFA Chain of Custody Standard on 1 October 2024.

These changes allow entities to use the SFA logo for general claims in very specific circumstances: where there is no risk that the use of the logo can imply that products that are not 'SFA Certified' are 'SFA Certified'.

To avoid a situation where CABs have to run duplicate systems for multiple versions of the Standard at once, we have obsoleted v1.0 entirely, setting a new effective date for replacing the current system (i.e. the SFA Chain of Custody Guidelines v3.1) as 1 March 2025. The only exemption to this effective date is that v2.0 will still require industrial primary processor entities to be certified against the SFA Clean Fibre Processing Standard from 1 November 2024, with an effective date of 1 November 2024. This essentially means entities may continue seeking certification against the SFA Chain of Custody Guidelines v3.1 until 1 March 2025. Entities will be able to use the traceability platform as soon as it is ready, though please note it is taking longer than expected and is unlikely to be ready before the end of the year.

We also clarified that transaction records only need to include the scope certificate number of the buyer if the buyer is certified against the SFA Chain of Custody Standard (2.6.2.L). We also added that transaction records shall include whether the SFA Volume-Based Fee has been paid on the fibre of interest.

More information on the [SFA Chain of Custody Standard v1.1](#) can be found in the Standard itself.

## Changes to the SFA Assurance and Certification Manual

We have updated our Assurance and Certification Manual to meet the new requirements of the ISEAL Code of Good Practice, which was revised this year. More information on the specific changes to this document can be found in the amendment record of the revised SFA Assurance and Certification Manual itself.

## Other changes of intent following consultation

We have made a range of other changes to intent based on consultation feedback. These changes have been implemented as it is expected that they are uncontroversial. The changes are listed in Table 1.

**Table 1: Other changes of intent following consultation.**

Section (Clauses)	Revision
Entity structure (3.6)	Extending the time an entity has to inform their CAB and the SFA of any change to the identify of their management representative from 10 to 20 days. <i>Reason: 10 days is considered unnecessarily short.</i>
Entity record keeping and evaluation (6.1 e)	Allowing the entity to update their records regarding actions taken to meet the clauses of the Standard annually rather than monthly. <i>Reason: Considered to be an excessive burden for little impact.</i>
Entity record keeping and evaluation (6.3)	Reduced record keeping length to five years (down from 10). <i>Reason: Considered to be an excessive burden for little impact.</i>
Occupational health and safety (10.7)	Included an exemption that sites that do not use employees or have people sleeping on site do not need to have fire alarms. <i>Reason: Ensuring requirements are not targeting irrelevant situations.</i>
Occupational health and safety (10.8)	Removed the exemption that sites that do not use employees do not have to provide fire exits, toilets and/or suitable conditions for pregnant/nursing women, instead asking sites to justify any reason why they may not need them. <i>Reason: All people, whether employees or not, deserve these facilities. Justification exemption added in to recognise that their requirements may not be relevant to some situations (such as toilets in remote herding).</i>
Occupational health and safety (10.8 b)	Created exemption to the requirement for fire exits in situations where exists are immediately obvious, such as in an open-sided barn. <i>Reason: Ensuring requirements are not targeting irrelevant situations.</i>
Conservation and restoration (12.1)	Expanded the responsibility for conserving the natural habitats and biodiversity of the land they use to include entities as well as sites. <i>Reason: This recognises that the entity can play an important role in coordinating sites' efforts.</i>

Section (Clauses)	Revision
Nutrition and water (16.5)	<p>Allowed the site to feed animal by-products or fishmeal to goats where directed to do so by a veterinarian for justified reasons, where the only justification allowed is for the welfare of the goat. Feeding goats by-products of sick animals' by-products is still restricted.</p> <p><i>Reason: FAO has recommended that herders feed the byproducts of healthy animals to weak animals under certain circumstances<sup>1</sup>.</i></p>
Medical care and observation (17.2.2)	<p>Included requirement that sick animals must be isolated from the herd where there is a risk of contagion.</p> <p><i>Reason: As recommended by animal welfare experts.</i></p>
Medical care and observation (17.5)	<p>Added 'smell' range to sight and sound of other goats in the guidance of avoiding complete isolation.</p> <p><i>Reason: Smell is an important sense for goats.</i></p>
Medical care and observation (17.5)	<p>Reduced the quarantine period for new animals to 21 days (from 30).</p> <p><i>Reason: Recommended by producers. Note that animals who appear sick also shall be quarantined.</i></p>
Medical care and observation (17.5)	<p>Quarantine for new animals is now a requirement rather than an improvement indicator.</p> <p><i>Reason: Deemed essential for the welfare of the goats.</i></p>
Breeding (23.5)	<p>Added electro-ejaculation to the list of techniques banned during artificial insemination.</p> <p><i>Reason: As recommended by animal welfare experts.</i></p>
Rearing (24.1)	<p>Included requirement that c-sections shall be justified.</p> <p><i>Reason: C-sections are rare and miscarriage is usually allowed to happen. C-sections should be justified rather than the norm.</i></p>
Rearing (24.6)	<p>Changed the improvement indicator to keep supplies of colostrum to a requirement.</p> <p><i>Reason: This should be easier for producers than initially expected, as powdered versions these products with a long shelf life are available.</i></p>
Rearing (24.9)	<p>Raised the minimum weaning age to 16 weeks (from eight weeks).</p> <p><i>Reason: As recommended by animal welfare experts.</i></p>

<sup>1</sup> [https://www.fao.org/fileadmin/user\\_upload/FAO-countries/Mongolia/docs/Malchdad\\_ogoh\\_zovlomj\\_book.pdf](https://www.fao.org/fileadmin/user_upload/FAO-countries/Mongolia/docs/Malchdad_ogoh_zovlomj_book.pdf)



Section (Clauses)	Revision
Working animals (25.9)	Made the improvement indicator that working animals should not harm fibre-producing animals a requirement. <i>Reason: This was a mistake.</i>

## Other clarifications following consultation

Consultation revealed a range of clauses where our intent was not clear, resulting in a suite of clarifications. These are shown in Table 2.

**Table 2: Additional clarifications made following consultation.**

Section (Clauses)	Clarification
Hazards (5.2)	Replaced requirements to have 'safety data sheets' with 'manufacturer's instructions including any safety data sheets' to recognise that some products will not have safety data sheets.
Entity record keeping and evaluation (6.2)	Record keeping does not need to be done by the entity, if duplicate records are collected by others (such as government or local veterinarians) and the entity has full access to these records and can share them with the CAB.
Entity record keeping and evaluation (6.3 h; 6.3 i)	Record-keeping requirements related to sales and payments are referring to cashmere fibre sales and payments.
Entity record keeping and evaluation (6.3)	Entities shall keep records related to the Standard for a minimum of 10 years from initial certification (they do not need to show 10 years of records before they can be certified).
Continual improvement (7.4.5)	Defined 'traditional knowledge' as knowledge held by those who live in the area, work locally in the production of cashmere and/or are otherwise part of a local community that is engaged with the production of cashmere.
Continual improvement (7.5)	The improvement indicator to effectively manage changing weather patterns due to climate change is talking about appropriate stocking rates and selective breeding for physical traits that will help animals adapt to changing conditions.
Respectful tenure (8.4)	That the requirement that entities do not use the power entrusted to them for personal gain includes passing on any price premiums gained for 'SFA Certified' fibre.
Labour (9.1)	That when discussing ILO Convention 29 we mean the ILO Indicators of Forced Labour.  That the normal scope of work is what is expected beyond which would be considered additional and/or overtime for which the employee shall receive additional remuneration.

Section (Clauses)	Clarification
Labour (9.4)	<p>Contracts shall include the terms of remuneration.</p> <p>Contracts shall include an explicit description of the specific circumstances under which an employee is financially responsible for any loss of livestock.</p>
Occupational health and safety (10.9)	10.9 is about workers eating and storing their food, with conditions for goats' food covered in 16.2.
Conservation and restoration (12.3)	Requirements related to minimising sedimentation are concerned with the sites' behaviour to minimise sedimentation, not holding them responsible for ensuring that water resources are not sedimented.
Handling and herding (14.3)	Removed guidance that transportation is a justification for the use of tethering or confining goats to crates, as this is already illegal in some countries.
Fibre harvesting (15.5)	Goats' access to both food and water (not just food) shall be restricted for four hours before fibre harvesting.
Nutrition and water (16.14)	'Gradually' is defined as over at least two weeks in terms of how long goats must be given to adapt to a change in diet.
Medical care and observation (17.1)	The improvement indicator for an annual visit by a vet shall be on site.
Medical care and observation (17.2.1)	Sick animals kept under observation shall be observed at least twice in every 24-hour period.
Medical care and observation (17.7)	To strengthen the wording of the requirements that castration shall only be done for justified reasons, the text was changed to castration shall not be done without justification.
Housing and enclosures (19.2)	Enclosed spaces are anything that restricts a goat's freedom of movement and includes but is not limited to housing, fenced areas and transportation vehicles. Also added the SFA Glossary.
Housing and enclosures (19.2)	It is in housing that bedding shall be provided over artificial flooring.
Housing and enclosures (19.8)	'Well-ventilated' means free from unpleasant or strong odours, with guidance stating that the aim of the requirement is that ammonia levels are below 1-2ppm at the level of animals and there are 10-20 air changes per hour.
Transport (21.5)	Feed and water prior to transport shall be nutritionally complete food suitable to life stage and ad lib respectively.

Section (Clauses)	Clarification
Transport (21.6)	The rest period between transportation periods shall be eight hours and give goats enough space to exercise (i.e. 5m <sup>2</sup> per goat).
Breeding (23.1)	Breeding strategies shall also result in easy kidding/birthing and robustness to disease.
Breeding (26.1)	'Fibre quality' refers to length, fineness and colour.
Multiple sections and clauses	'Updated annually' means 'updated at least annually'.
Assurance and Certification Manual (24.6.1.k)	Positive and negative (not just negative) unintended effects shall be recorded by the entity.
SFA Glossary	Competent persons are those who are able to demonstrate their competence to the CAB.

## What isn't changing

The scope of the SFA Animal Fibre Standard v1.0 remains global and continues to focus on effective management, decent work, biodiversity, improving animal welfare and enhanced fibre quality.

# Annex 1: Stakeholder Engagement

## Methods

As part of the review of our cashmere programme, the SFA ensured that stakeholders have sufficient time and opportunity to provide input on the Standard. This included an online survey that was open on our website for over 60 consecutive days from 29 May 2024 to 5 August 2024. During this time, the consultation was advertised through our website, members' bulletin, monthly newsletter and staff email signatures. Direct emails to interested parties were sent to (a) announce that the consultation was opening, (b) remind stakeholders to participate at the mid-point of the consultation period, (c) remind stakeholders to participate a week before the consultation closed, and (d) announce that the consultation would be held open for a week longer than the original close date (29 July 2024). We also held one-to-one conversations with some SFA members and received ad hoc advice via email from other stakeholders. To ensure engagement with the cashmere-producing community, in-person events were hosted in Mongolia and China in the local language. These events generated the majority of participants in this consultation (42 and 35 participants respectively).

The SFA also hosts an [Open Consultation portal](#), where stakeholders can provide comment on any aspect of the SFA programme at any time. Two comments relevant to the SFA Cashmere Standard came through this portal and the respondents were redirected to the public consultation on the SFA Cashmere Standard. This portal remains open in perpetuity.

Furthermore, as part of developing this document, and the draft and final versions of the SFA Animal Fibre Standard, we engaged with the SFA Standard Setting Improvement Committee (SSIC), which is comprised of representatives from a variety of stakeholder groups. If you are interested in becoming a sitting member of the SSIC, please email [standards@sustainablefibre.org](mailto:standards@sustainablefibre.org).



## Participation

This section presents participation data for the consultation activities detailed above. Some participants joined more than one event.

**Table 3: Number of individual participants/respondents representing each stakeholder group.**

Stakeholder group	Public consultation	One-to-one/email	Workshops/other	Total
Academia	2	2	7	11
Cashmere farming and/or herding			45	45
Cashmere primary processing	1		4	5
Cashmere secondary processing and manufacturing	3			3
Cashmere traders, brands and retailers	2	3		5
Governance and/or management				0
Non-governmental organisation	1	3		4
Standard setting, conformity assessment and/or accreditation	2	1	11	14
Unknown			22	22
<b>Total</b>	<b>11</b>	<b>9</b>	<b>89</b>	<b>109</b>

**Table 4: Number of individual participants/respondents representing each geographical region.**

Geographical region	Total
Asia	97
Europe	8
North America	1
Oceania	3
<b>Total</b>	<b>109</b>

## Other substantive issues raised

Here we present a summary of the substantive issues raised during the consultation that have not resulted in change to the Standard. We explain our reasoning and outline next steps if any. Next steps fall into one of three categories: (1) substantive issue logged for consideration in future reviews of the SFA programme, (2) next steps do not involve change to the Standard and/or (3) no change needed. (Actual stakeholder comments (anonymised) are available on request from [standards@sustainablefibre.org](mailto:standards@sustainablefibre.org)).

### Substantive issues logged for future consideration

These are shown in Table 5. This outcome was applied where issues warranted consideration but were raised too late in the process for adequate development and impact analysis ahead of potential implementation. After the delay to the SFA Cashmere Standard v1.0, the SFA believes it is more important to publish a greatly improved SFA Animal Fibre Standard v1.0 than delay publication to resolve these outstanding issues.

### Next steps that do not involve changing the Standard

These are shown in Table 6.

### No change needed

These are shown in Table 7. An explanation of why no change is believed to be needed is given.

Table 5: Issues raised during consultation that warranted consideration but were raised too late in the review for adequate impact analysis ahead of potential implementation. B = Change of intent that raises the bar and needs impact analysis before implementation; F = Feasibility barrier; O = Out of scope, i.e. belongs in another Standard; R = More desk research needed to define clauses, i.e. research may exist already, but needs to be reviewed by SFA.

Principle	Issue for consideration in next review	Reason for delay	Raised by
<b>Effective management</b>	Improvement indicators for attending training should be requirements.	B	Non-governmental organisation
	Improvement indicators for record keeping should be requirements.	B; F <sup>2</sup>	Non-governmental organisation
<b>Decent work</b>	Standard needs clauses for holiday pay and regularity of pay.	B	Cashmere traders, brands and retailers
	Standard should include an improvement indicator that entities develop a gender policy and offer support for implementation of this and other initiatives that promote gender equality.	B	Academia
	Standard should target the inclusion of women herders and female-headed households into entities, as members and in leadership positions, with encouragement and rewarding of active participation at all levels.	B	Academia
	Standard should require entities to implement effective grievance mechanisms, although this may be beyond the capacity of smaller entities.	B	Academia
	Standard should prevent wider modern slavery issues beyond forced and child labour, such as debt bondage, sexual exploitation and trafficking.	B	Cashmere traders, brands and retailers
<b>Biodiversity and land-use</b>	Standard should cover all waste disposal, not just hazardous waste.	B	Cashmere farming and/or herding
	Standard should ban activities that intentionally harm wildlife species, especially goat predators.	B	Non-governmental organisation

<sup>2</sup> Potentially not feasible due to literacy barriers.



Principle	Issue for consideration in next review	Reason for delay	Raised by
<b>Biodiversity and land-use</b>	Improvement indicators related to the restoration of areas damaged by hazardous substances should be requirements.	B	Cashmere secondary processing and manufacturing
<b>Animal welfare</b>	Standard should include clauses for easing goats into the common husbandry practices that they are likely to experience during their life.	B	Non-governmental organisation
	The requirement that the ratio of bucks to does shall be appropriate to the age of the buck lacks specificity.	R	Cashmere farming and/or herding; Non-governmental organisation; Standard setting, conformity assessment and/or accreditation
	Improvement indicators that herds are assessed annually by a vet should be requirements.	B	Non-governmental organisation
	Standard should ban all branding including freeze, slap or any other forms of branding.	B	Non-governmental organisation
	Requirements that sick, lame and injured goats are treated should be more specific about what treatments shall be received.	R	Non-governmental organisation
	Requirements to check hooves should be expanded to full health checks.	B; R	Non-governmental organisation



Principle	Issue for consideration in next review	Reason for delay	Raised by
<b>Animal welfare</b>	Requirements to prevent parasites should be expanded to cover all preventable health issues.	B; R	Non-governmental organisation
	Improvement indicators that a site should record medical treatments received should be requirements.	B; F <sup>3</sup>	Non-governmental organisation
	Standard should include a requirement for entity to evaluate morbidity rates across sites and implement measures to address any concerns observed.	B	Non-governmental organisation
	Improvement indicators relating to pain relief and castration should be requirements.	B; R <sup>4</sup> ; F <sup>5</sup>	Cashmere traders, brands and retailers; Non-governmental organisation
	Clauses related to access to pasture should define minimum access times.	R	Non-governmental organisation
	Requirements for welfare plans should cover all goats and not just those that spend the majority of their time enclosed.	B	Non-governmental organisation
	Requirement that housed goats get 2m <sup>2</sup> per animal state that it is 2.5m <sup>2</sup> for horned animals.	B	Non-governmental organisation
	Requirements defining the environmental parameters of enclosures should be more specific and cover more variables than 'well-ventilated', e.g. temperature, humidity and air quality with upper and lower limits.	B; R	Non-governmental organisation
	Standard should require alarms and alerts for when the environmental variables in enclosed spaces exceed limits.	B	Non-governmental organisation

<sup>3</sup> Potentially not feasible due to literacy barriers.

<sup>4</sup> Immuno-castration suggested and desirable, but not yet commercially available.

<sup>5</sup> Potentially unfeasible due to drug access and/or use of castrated tissue for human consumption.



Principle	Issue for consideration in next review	Reason for delay	Raised by
<b>Animal welfare</b>	Standard should require that all artificial lighting is full-spectrum, shall not flicker and is of an appropriate intensity, with clearly defined upper and lower limits.	B; R	Non-governmental organisation
	Standard should ban slatted floors, or at least set minimum bar and gap widths (36mm and 12mm respectively).	B	Non-governmental organisation
	Standard should require enclosures are cleaned regularly with an explicit frequency and guidance on minimum norms of cleanliness.	B	Non-governmental organisation
	Standard should require that neonates and does with neonates are given additional shelter, as the Standard requires for does close to giving birth.	B	Non-governmental organisation
	Standard should ban the transportation of kids that have not yet been weaned.	B	Non-governmental organisation
	Standard should provide limitations on when and how far pregnant, nursing kids, sick/ill, other compromised animals can move.	B; R	Non-governmental organisation
	The minimum interval between breeding for does should be raised from 10 to 12 months.	B	Non-governmental organisation
	The breeding ratio for bucks to does should be lower than 20:1.	B	Non-governmental organisation
	Standard should require regular breeding checks for goats (especially bucks) to ensure they are fit for breeding.	B	Non-governmental organisation
	Standard should ban c-sections to prevent undesirable birthing traits from being passed on to the offspring.	B	Non-governmental organisation
Standard should require soft, deformable bedding for working animals.	B	Non-governmental organisation	



Principle	Issue for consideration in next review	Reason for delay	Raised by
<b>Animal welfare</b>	Standard should require a first aid kit is kept for goats, not just working animals.	B	Non-governmental organisation
	Standard should include more requirements related to bio-security measures.	B; R	Non-governmental organisation
	Slaughterhouse agreements should also cover requirements about transportation, not just slaughtering.	B	Cashmere traders, brands and retailers
	Standard should clarify the conditions where combing and shearing is allowed.	B; R	Cashmere secondary processing and manufacturing
	The requirement to keep goats in stable groups of familiar conspecifics, with opportunities for bonding and other affiliative interactions should be removed.	B; R	Standard setting, conformity assessment and/or accreditation
	The improvement indicator for the entity to monitor and evaluate breeding interventions should be removed as interventions are rare and natural miscarriages are allowed to happen. Keeping this indicator allows entities to avoid other more impactful indicators as part of continual improvement for longer.	B; R	Cashmere farming and/or herding; Standard setting, conformity assessment and/or accreditation



Principle	Issue for consideration in next review	Reason for delay	Raised by
<b>Animal welfare</b>	The Standard should require that where the majority of a goat's diet comes from forage, the site shall have a feeding management plan for when normal forage is disrupted. It should clarify that disruption may include extreme weather events, exacerbated by climate change, and that the feeding plan ensures that stocking sizes are appropriate such that culls are avoided during extreme events.	B	Non-governmental organisation
	The terms 'competent', 'clean', 'suitable', 'rapid' and 'effective' need to be explicitly defined.	R	Standard setting, conformity assessment and/or accreditation
	Goats usually rest for longer than 2 hours when left alone. We should increase the rest period given to goats during the middle of the day from 2 to 2.5 hours.	B	Standard setting, conformity assessment and/or accreditation
	Fibre-producing animals should not be able to hear or smell the act or residual effects of slaughter.	B	Non-governmental organisation
<b>Other</b>	Standard should set time limits on all timebound clauses.	R	Non-governmental organisation
	Standard should protect workers who sit in a pitch-black room under UV light while sorting cashmere.	O <sup>6</sup>	Cashmere traders, brands and retailers

<sup>6</sup> Within scope of SFA Clean Fibre Standard





Table 6: Addressing some comments did not require changes to the Standard. Here we list those comments and their proposed solutions.

Principle	Comment and solution
Animal welfare	<p>Some stakeholders raised concerns about goats from ‘SFA Certified’ operations being sold to unregulated slaughterhouses. Certifying slaughterhouses falls outside of the SFA’s remit; however, we felt that we have an end-of-life responsibility to all goats that have produced ‘SFA Certified’ cashmere. To exert some influence on the slaughterhouses that certified entities use, we considered implementing a due-diligence requirement that obliges the certified entity to have a lawfully binding agreement with the slaughterhouse. This agreement would have stipulated that the slaughterhouse must abide by aspects of the SFA’s animal welfare standards and give access to observers affiliated with the certified entity (i.e. the Conformity Assessment Body, hereafter the CAB).</p> <p>As part of consultation, we found that this is likely to trigger considerable bureaucracy in China, where slaughterhouses tend to be run by the state, which would want to carefully consider any agreements before signing up. As a solution it was proposed that 12 months is given for entities to transition to the new requirement. It was also noted that 1.2 (which stipulates that local law takes precedence over the Standard) may void this requirement in China and so will require monitoring and evaluation for future revisions of the Standard to ensure it is effective at improving animal welfare.</p> <p>Ultimately, the SFA Standard Setting Improvement Committee was critical of the proposal, stating that the requirement is not feasible (difficult to implement) and if implemented would be unlikely to be effective and difficult to monitor. The proposal also represents significant scope creep into meat certification which is not our mission. The SFA resolves to support resolution of this issue through the Rangelands Stewardship Council, where engagement with (and potential certification of) the meat industry is already within scope.</p> <p>Delete the word 'well-maintained' in 15.1</p> <p><i>Solution: We understand this disagreement relates to how this phrase translates into Mongolian. Intent has been communicated to translators.</i></p> <p>18.3 should be an improvement indicator instead of a requirement because it is hard to monitor.</p> <p><i>Solution: We do not believe this is a good reason to remove the requirement. However, it will be monitored for auditability issues and potentially raised as an issue for the next review.</i></p>



Principle	Comment and solution
Other	<p>Concerns about different rules for different countries being unfair.</p> <p><i>Solution: Closely review all Country Guidance documents in local language to ensure that they do not alter implementation of the base requirements.</i></p> <hr/> <p>Companies and herders thought the record-keeping requirement that they track unintended consequences of SFA certification are not quite relevant to their works and it's not that significant to record.</p> <p><i>Solution: We have moved this clause to the Assurance and Certification Manual, ensuring that the CAB investigates these possibilities as part of the audit, putting the burden on the CAB to investigate, rather than the entity to record.</i></p>



Table 7: Comments received that have not resulted in changes to the draft Standard. For each comment we justify our decision.

Principle	Comment and SFA response
<b>Effective management</b>	<p>6.1 The record keeping of pesticides, fertilisers and all hazardous substances should be performed by people above the herder's level. It's hard for herders to do this paperwork.</p> <p><i>Response: This is already the responsibility of the entity, above the herder.</i></p>
	<p>6.1 h)/i) The companies and herders thought that this info is not that relevant to their works and not that significant to record.</p> <p><i>Response: We believe h and j would already have been recorded, so this is not additional work. There is no requirement to share this information with anyone besides the CAB, if that is the concern.</i></p>
	<p>6.2 c)/d)/e) Herders said they usually don't keep this info on the paper (due to the literacy level), but if they are asked, they could tell.</p> <p><i>Response: That would be considered acceptable.</i></p>
	<p>Public consultation showed widespread support for the continual improvement framework.</p> <p><i>Response: No change needed.</i></p>
	<p>Keeping parentage records is not needed.</p> <p><i>Response: This is only an improvement indicator so is not required anyway.</i></p>
<b>Decent work</b>	<p>9.4 Suggest having employment T&amp;C in writing for awareness and triangular investigation purposes</p> <p><i>Response: No change. There has been a conscious decision to avoid a situation where written contracts could be used against illiterate workers.</i></p>
	<p>9.1.1 can potentially be interpreted that family members can be forced into labour, and this would be potentially ok.</p> <p><i>Response: We don't think this is likely but would immediately raise as an issue if reports of this behaviour were made.</i></p>



Principle	Comment and SFA response
<b>Decent work</b>	<p>"Verbal contract/agreements" (e.g., 3.4, 9.4) are unclear and not possible to verify.</p> <p><i>Response: We disagree. It is expected that the CAB would take agreement between both parties on the details of the contract as an effective verbal arrangement.</i></p>
<b>Biodiversity and land use</b>	<p>12.3 and 12.4 should be combined.</p> <p><i>Response: 12.3 is about conservation (requirement) and 12.4 about restoration (improvement indicator). We believe these should stay separate.</i></p> <p>To reduce land degradation, the number of livestock should be reduced, and their quality should be improved.</p> <p><i>Response: This is already covered in the Standard.</i></p> <p>Agriculture is very challenging and will require the use of hazardous substances.</p> <p><i>Response: There is nothing that prevents the use of hazardous substances.</i></p>
<b>Animal welfare</b>	<p>Sufficiently dry, soft, deformable, bedding or substrate should be provided for all animals to lie down comfortably and simultaneously when fenced or housed.</p> <p><i>Response: This nuance was lost when updating the relevant requirement for version 2.0. We have reinstated the original requirement from v1.0 with minor editorial changes.</i></p> <p>The appropriate breeding ratio for any given buck is dependent on the age of the buck.</p> <p><i>Response: This nuance was lost when updating the relevant requirement for version 2.0. We have reinstated the original requirement from v1.0 with minor editorial changes. A lack of specificity in this requirement has also been logged as an issue for consideration at the next review of the Standard.</i></p> <p>The exercise area should be outdoors.</p> <p><i>Response: This nuance was lost when updating the relevant requirement for version 2.0. We have reinstated the original requirement from v1.0 with minor editorial changes.</i></p>



Principle	Comment and SFA response
<p><b>Animal welfare</b></p>	<p>Quarantine should be a requirement, not an improvement indicator.  <i>Response: This nuance was lost when updating the relevant requirement for version 2.0. We have reinstated the original requirement from v1.0 with minor editorial changes.</i></p>
	<p>There are many feral dogs that feed on animal carcasses. Exterminating feral dogs is ineffective, as they continue to reappear.  <i>Response: There is no requirement to exterminate feral dogs.</i></p>
	<p>In Mongolia, there is a legal provision for isolation (8.4.3 of the Law on livestock Genetic Resources). Change 'goat herd' to 'male goat herd' or add 'male goat herders should not separate male goats from their herd during non-breeding periods.'  <i>Response: The standard already says 'outside of the breeding season.'</i></p>
	<p>14.7 and 14.4 should be combined.  <i>Response: Keep separate as these are about two different things: isolation and tight confinement. I.e. you can be isolated without tight confinement or in tight confinement without being isolated.</i></p>
	<p>The improvement indicator that goats may have access to shrubs and bushes for browsing should be a requirement.  <i>Response: This nuance was lost when updating the relevant requirement for version 2.0. We have reinstated the original requirement from v1.0 with minor editorial changes.</i></p>
	<p>16.13 and 16.14 should be combined.  <i>Response: We believe these should be assessed separately.</i></p>
	<p>Some families do rasp the goats' horns.  <i>Response: This is already allowed; no change needed.</i></p>



Principle	Comment and SFA response
<p><b>Animal welfare</b></p>	<p>15.1 There is no information as to what happens to people found not competent or what the requirements are for animals injured.</p> <p><i>Response: The certificate shall be suspended or withdrawn. The SFA avoids being prescriptive on matters of rectification as a matter of principle.</i></p>
	<p>15.2 Further information as to which methods are acceptable is needed either in the Standard or in the auditor guidelines before determining if this is adequate to maintain good welfare.</p> <p><i>Response: We believe the requirement to be prescriptive enough to protect animal welfare.</i></p>
	<p>16.11 should be a requirement instead of an improvement indicator.</p> <p><i>Response: This must stay as an improvement indicator or it will set the bar above industrial outdoor systems, which would be a significant rise in requirements unlikely to be considered even at the next review. 16.11 is one of two requirements that would prevent such systems ever meeting 'SFA Best Practice'. Note that adequate feed that meets goats' nutritional needs is covered in another requirement, which is a 'shall'. Note that 16.10 will be changed from an improvement indicator to a requirement, based on similar feedback.</i></p>
	<p>The Standard should specify a percentage of roughage in the diet.</p> <p><i>Response: We don't believe including a percentage would make the requirement more effective, but it would make it more prescriptive in a way that might make it more or less effective for certain breeds.</i></p>
	<p>17.7 should be a requirement instead of an improvement indicator.</p> <p><i>Response: We believe there would be very few situations where sites would not be monitoring and acting on mortality as it is in the interests of their livelihoods to do so. Thus, we believe auditing this would be a waste of time and money for little additional impact. However, this is an entity-level improvement indicator, which would involve the entity completing a meta-analysis of mortality across all their sites, which we believe would be a useful and exceptional activity to undertake.</i></p>
<p>19.10 should be a requirement instead of an improvement indicator.</p> <p><i>Response: This appears to be an error; all goats shall have access to natural light. We have changed this to a requirement.</i></p>	



Principle	Comment and SFA response
<p><b>Animal welfare</b></p>	<p>The Standard should require that goats have access to pasture except for specific justified reasons.  <i>Response: Making this a requirement would be a significant change in the bar that would remove many industrial outdoor systems from the programme. Note that there are two improvement indicators (19.1 and 16.11) and that, while not ultimately required, failure to achieve them (as industrial outdoor farming systems will always do) prevents the entity from achieving 'SFA Best Practice'.</i></p> <p>The Standard should require vets (and in countries without vets require the use of non-paraprofessionals) from undertaking certain procedures.  <i>Response: The Standard requires competence to be shown, to avoid requiring credentials and formal qualifications in regions where they may not be available.</i></p> <p>24.3 should be a requirement instead of an improvement indicator.  <i>Response: We believe there would be very few situations where sites would not be monitoring and acting on these things as it is in the interests of their livelihoods to do so. Thus, we believe auditing this would be a waste of time and money for little additional impact. However, this is an entity-level improvement indicator, which would involve the entity completing a meta-analysis of mortality across all their sites, which we believe would be a useful and exceptional activity to undertake.</i></p> <p>The Standard must consider pasture feeding to be preferable to forage.  <i>Response: We think the respondent means fodder, not forage, which is pasture feeding. Pasture feeding is already preferred to fodder.</i></p> <p>The Standard should require that bucks are kept separate from flocks outside of breeding season.  <i>Response: We disagree based on other stakeholder feedback.</i></p>
<p><b>Other</b></p>	<p>Whenever animals are exempt from standard practices, this should be recorded so auditors can tell if this is normal practice or if there might be farm issues/misunderstandings. It also allows outlining of areas for continuous improvement, training, better management, etc., which all improve animal welfare and animal production and demonstrate commitment and robustness within the standard.  <i>Response: The SFA Assurance and Certification Manual already requires auditors to note exemptions.</i></p>



Principle	Comment and SFA response
<p><b>Other</b></p>	<p>Public consultation identified no concerns that the changes will push entities out of the programme.  <i>Response: No change needed.</i></p>
	<p>Public consultation showed belief that the new Standard will increase the number of new entities applying for their first certificate.  <i>Response: No change needed.</i></p>
	<p>Public consultation raised no concerns about the complexity of the new Standard.  <i>Response: No change needed.</i></p>