

*Textile Exchange*

# Responsible Down Standard 2.0

Implementation Manual



**TextileExchange**  
Creating Material Change



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The Responsible Down Standard was originally released January 2014

Sites shall have until March 24, 2016 to comply with RDS 2.0.

For more details on the RDS 2.0 transition policy, visit <http://responsibledown.org/>.

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## Introduction

The RDS Implementation Manual provides interpretations and clarifications for the Responsible Down Standard, including interpretations of the Content Claim Standard that apply to the RDS. All guidance given in the manual is to be considered binding to Certification Bodies (CBs) working with, and Organizations certified to, the RDS.

This manual will be updated regularly to address areas of uncertainty or to give further detail in the application of the standard. It is up to all users of the standard to regularly check for the most current version of the manual found at <http://responsibledown.org>. The manual does not change or alter any of the criteria of the standard, but rather is intended to support correct and consistent application of the requirements.

CBs are to use the guidance and assessment requirements found in the current version of the RDS Implementation Manual for their clients at the time of their certification. Whenever there is an update to the manual, TE will inform all CBs. Organizations will be assessed against the new version of the manual during their next annual certification. If it is a significant change, TE will communicate to CBs that they must communicate to all Certified Organizations that changes should be made as soon as possible, but will not require compliance with the newly added requirements until their next annual certification.



## Application of the CCS for RDS

The Responsible Down Standard requires compliance with the requirements of the TE Content Claim Standard (Sections A, B, C and D), whereby the Claimed Material is defined as:

Certified Down: any down from organizations that comply with the applicable modules of the RDS.

**All Claimed Materials entering the supply chain must have a Transaction Certificate (TC) issued by the Certification Body (CB).**

All Certified Responsible Down entering the supply chain shall have a Transaction Certificate (TC) issued by the Certification Body. A TC may include multiple shipments from the same seller to the same buyer. One TC may include up to 100 shipments in a maximum time frame of 3 months.

The guidance related to the CCS requirements are specified for down and feathers to clarify how they are applicable to this specific supply chain. The CCS only applies for the 'down and feather' based portions in the supply chain, in which the use of Transaction Certificates (TC's) is obligatory. For the 'waterfowl' based components TC's are not obligatory as specific Chain of Custody requirements are embedded in modules 1 and 4 of the RDS.

Below, all instances of "Claimed Material" shall refer to RDS Certified down or feathers.



## CCS Interpretations

### A1 - Scope

#### A1.2 Application

The CCS applies to organizations that wish to demonstrate the validity and legality of the material content claim of the products they buy, sell and/or produce. It provides third party verification of the amount of a given material being claimed in a final product. It addresses the flow of goods within and between companies, and covers manufacturing, storage, handling, and shipping.

**Guidance:** CCS certification applies to the full supply chain, from the source of the input material to the last point of production or sale to the Organization (brand or retailer) that is selling to end consumers.

If a brand or retailer is receiving CCS goods and selling them on to other brands or retailers, the former will need to be certified.

When the CCS is being used for the chain of custody requirements for a standard, such as the Organic Content Standard or TE Recycled Claim Standard, the scope of the acceptable raw materials will be defined by that standard.

CBs must not certify another third party standard's product using the CCS without that standard owner's express written permission. (eg. A CB cannot use the CCS to certify that GOTS yarn is present in the final product without first getting written permission from GOTS.)

Each Certified Organization must hold its own scope certificate.

A1.3d The Standard does not address any processing inputs.

**Guidance:** Processing inputs are those materials or substances that are used in the processing of products and that do not become a significant part of the product being produced. For example: chemicals used in dyeing and finishing, or detergents used in scouring.

### A4 - Definitions

The following additional terms have been defined:

**Accreditation:** Accreditation is a procedure by which an authoritative body evaluates and gives formal recognition that a certification program is in accordance with the standards of the authoritative body.

**Certification Body (CB):** The organization responsible for all aspects of assessment against the TE standard.

All CBs must be accredited to the TE standard by a TE-approved professional accreditation body.

**Abbreviations:**

- CCS – Content Claim Standard



- OCS – Organic Content Standard
- RCS – TE Recycled Claim Standard
- CB – Certification Body
- TC – Transaction Certificate

## B1 - General requirements for Certification

### B1.2 Records

The Organization shall maintain complete and up-to-date records to demonstrate conformity with all requirements of the CCS.

**Guidance:** These should include results from regular internal mass balance calculations, as well as a material flow diagram for all CCS products.

The Organization shall keep complete and up-to-date records of the description, quantities, origins and/or destinations of all CCS products received and delivered.

**Guidance:** These records must be matched up with supporting CCS transaction certificates.

In the situation that an input approved to a separate standard (for example, GOTS certified goods are accepted as inputs for OCS certified products), this inventory must be reported to that CB and confirmed that it has not been used for that other standard's production. The purpose of this requirement is to prevent certified goods being 'double counted', ie: claimed as inputs for two separate standards.

## B2 - Auditing Requirements

### B2.1 Inspection Requirements

Organizations involved in the manufacturing and handling of CCS products, from the initial processing of the received Claimed Material to final packing, as well as traders of CCS products, must be inspected by a CB licensed by Textile Exchange, and must hold a valid Scope Certificate.

**Guidance:** Licensing by TE involves accreditation by a third-party accreditation body.

### B2.2 Frequency of Inspections

Inspections are to be carried out on an annual basis.

The CB has the right to carry out unannounced inspection visits. The visits shall cover in particular those units or situations where there may be specific risk of confusion or exchange of CCS products with other products.

**Guidance:** Inspections are to occur at least annually, within the calendar year, and within the validity period of the scope certificate. Non-conformities must be corrected within two months of the inspection. Certification decisions may be made by the CB up to two weeks after receiving notification of the correction of non-conformities from the Certification Organization. In the case of no non-conformities, certification decisions must be made within two months of the inspection.



CBs that are certifying more than 50 sites to the CCS must perform a minimum of two percent unannounced inspections. No more than 48 hours notice can be given in advance on an unannounced inspection.

Core production operations may not be exempt from inspection/certification.

**Guidance:** Examples of core processing operations for textiles include ginning, spinning, knitting or weaving, and all must be inspected and certified.

### B2.3 Inspection Coverage

The CB shall make a full physical inspection of the records, production processes and storage units at each site. External storage units being used for CCS products must be declared and will be subject to inspection.

**Guidance:** The Organization must give the CB, both for announced and unannounced visits, access to all parts of the unit and all premises, as well as to the accounts and relevant supporting documents. The same level of access must be given by sub-contractors that will be inspected. It is up to the contracting organization to ensure this is given. Inspectors must be allowed to interview staff and workers without restriction.

In advance of each inspection, the organization must ensure the CB has access to an updated and accurate document that contains:

- a full description of the production units including:
- name of each unit
- name and location of the site
- activity being performed
- a list of all the practical measures taken at the level of the unit to ensure compliance with the CCS standard
- a declaration that the organization is performing its operations in accordance with the CCS standard

The description, practical measures list, and statement of compliance with the Standard must be signed by a representative of the Organization.

This document will be verified by the CB during the certification process. If deficiencies and non-compliances with the requirements of this Standard are found, the CB will issue an inspection report to the organization. The organization must countersign this report and take necessary corrective measures. Certification will be given only after deficiencies or non-compliance issues have been corrected by the applying organization and confirmed by the CB.

## C1 - Documenting the purchase and sale of CCS inputs and outputs

Records of certified goods: records shall be maintained to enable the organization and the Certification Body to track the waterfowl, down and feather as it moves through and between the different processing operations. Records shall be current, complete, accurate, easily auditable and





understood, and shall be held for at least five years or for the length of their validity, whichever is longer. Transaction certificates (Appendix D2.3) shall be used to capture the transfer of goods from one organization to another. Transaction Certificates may only be issued by the Certification Body that has issued the Scope Certificate for the organization.

**Guidance:** All the information may be on the copy of the invoice/transport document.

Copy of TC to be available.

**Level:** MAJOR

**Guidance:** The CB must review the documents and amounts before issuing a TC, with all inputs accounted for through valid TCs. At a minimum the CB will check against the written requirements of the standard (C.1 of the CCS) as well as:

- copies of invoices/shipping documents and TCs for inputs that will be used to produce CCS goods
- amounts of stock on hand for inputs that will be used to produce CCS goods
- expected gain or loss during the production process(es)
- amount of CCS product being shipped and amount being put into stock
- copies of invoices/shipping documents and TCs for CCS goods that are being sold

Before issuing a TC, the CB must perform a mass balance calculation (taking into account production loss) that reviews available inventory to ensure enough certified input was available.

**Note that TCs:**

Can only be issued by the CB for the Certified Organization. The CB holds the ultimate authority on the issuance and withdrawal of the TC.

- Must be requested in a timely manner.
- Must be issued in a timely manner.
- Must not be issued if the client has major non-conformities.
- Input used from other approved standards (eg: GOTS) inventory must be reported to that standard body and confirmed that it has not been used for that standard's production.
- Must not be used in public communication.

If the Organization has issued 12 or less TCs, then all TCs must be inspected. For amounts over 144 TCs, the CB must inspect the square root of the total number of TCs issued over the year. If one TC is missing or is wrong, then there is cause for a non-conformity, and a root cause analysis must be done, including investigation into the extent of the problem, to see what the corrective action should be. If only a statistically minor number of mistakes are found, then a simple correction can be made, but if there is evidence of regular errors, then a full corrective action with follow up will be required. It will be up to the discretion of the CB to review a greater number of TCs, and to determine what correction actions should be taken.

**C1.1 Inputs:**

**C1.1a** For Claimed Materials entering the supply chain from an outside source:



For materials entering the supply chain, there must be a document giving the name and address of the supplier, the quantity and description of the goods, reference to claims being made about the material along with any corresponding verification or certification.

**Guidance:** Shipping documents and invoices can be used to supply this information, or if a separate document is created, they must contain the same information about the identity and quantity of the claimed material.

Any claims being made about the attributes of the claimed material (eg: social, environmental, quality, performance) that may be carried through to final product claims should also be included.

**Guidance:** In the case of RDS, the outside source will be the large collector or pre-processor.

**Level: CRITICAL MAJOR**

C1.1b For products already certified to CCS:

C1.1b A transaction certificate confirming that RDS inputs come from a supplier that has been certified to the RDS or an accepted equivalent standard shall be available. The organization shall check the supplier invoice and supporting documents to confirm that the date, quantity, blended percentage and material description all conform to the TC. (One batch can be spread over multiple shipments, with a maximum of 100 shipments in up to 3 months per TC: TE CCS TC policy.)

**Guidance:** The Certified Organization must have valid TCs confirming all CCS inputs. Where the CCS is used to support a product standard, the accepted equivalents will be defined in the specific standard.

Transaction certificate is required from final collectors or slaughter sites to all additional onward processing steps. A TC is needed if goods move from one certified site to another (which are separately owned). It shall state at a minimum:

- Seller
- Processor (if different entity than 'Seller')
- Buyer
- Name and address of Certification Body office
- Name and address of inspection body office (if different from 'Certification Body')
- Corresponding invoice and/or transport document
- Identification code
- Quantity (weight of down and feather product)
- Material type (down vs. feather)
- Country of dispatch
- Name and address of Consignee
- Country of destination
- Other shipment information (see example TC)
- In case the incoming batch is a mixed product, the % of certified down and feather in the batch
- Place and date of issue
- Stamp of the issuing body and signature of authorized person



For down and feather products arriving from a farm, a TC is not needed. However during reception check the responsible personnel shall verify that the down and feather products received are coming from certified source (by checking the scope certificate).

**Level: CRITICAL MAJOR**

C1.1c CCS products received from an internal source:

For goods that are flowing from one production unit to another within the same Organization there must be corresponding documentation that references the initial Claimed Materials, the quantity, blend percentage, and description of the CCS products being received.

**Guidance:** TCs are only required to document each time that goods change ownership. In the case of a valid sub-contractor, TCs are not required.

For example, a factory purchases fiber and receives a TC, then manufactures yarn and fabric internally. The factory will document the transactions from business unit to business unit, connecting the material with the original TC.

This requirement is applicable if the goods come from a facility which is owned by the same company, without a formal seller-buyer agreement. In that case, a TC is not required, but documentation of moved goods is necessary. This information should contain at least:

- Type and amount of product
- Original lot number/identification code
- Date
- Sender and receiver location/identification

**Level: CRITICAL MAJOR**

**Guidance:** The inspection of the TC can be done retroactively if the TC comes after the shipment is received.

A responsible person shall be assigned. The inspection procedures shall assure:

- That during reception check for the down and feather claimed as 'certified' under the 'Responsible Down Standard' only incoming products for which a transaction certificate issued by the Certification Body for the same program shall be approved.
- Supplier invoice, label, transport documents and/or any other relevant accompanying document shall be checked to confirm that all information (date, quantity, blend percentage, material description) conform to the TC. This can be done retroactively if the TC comes after the shipment is received.
- Closing and packaging to be checked

**Level: MAJOR**

C1.2 Outputs

There shall be an accompanying transaction certificate that states that the products have been produced according to the RDS standard. Invoices and shipping documents shall be available to show



that the outgoing products have been sold to a named entity.

**Guidance:** There shall be one or more personnel who are given responsibility for meeting this requirement.

The procedures shall include:

- for the down products sold as 'certified' under the 'Responsibly Sourced Down program' the seller shall apply for a TC at the CB.
- invoice, label and/or accompanying document of the outgoing products shall be checked to confirm that all information (date, quantity, blend percentage, material description) conforms to the TC/application of TC.
- closing and packaging shall be checked

**Level: CRITICAL MAJOR**

### C1.3 Mass balance calculation

For each production step, the records shall demonstrate the balance between the RDS inputs and the outputs containing the declared final amount of waterfowl, down and feather. All calculations are done based on the weight of the materials.

In its simplest form, the equation is:

$(A+B) \cdot (1-C) = D$  containing  $A/(A+B)$  % of material A

A = Amount of waterfowl, down and feather by weight

B = Amount of non-certified waterfowl, down and feather by weight

C = Percentage of loss during production

D = Amount of final product by weight

The calculation shall also take into account stock levels and rejected goods. When the properties of the waterfowl, down and feather vary significantly from the other materials, and the variance could lead to significant differences in gain or loss in production between the different materials, the organization shall show that they are taking this into consideration in their own calculations, and the CB will check these. The final percentage of gain or loss will be compared to the expected percentage and any differences will be investigated. Deviations of over 5% of the expected amounts will be investigated and may result in a non-conformity assessment.

**Guidance:** Below, some specific guidance is given for the different processes:

**Organizations** will be required to submit their formulas and sample mass balance calculations to their CBs in advance of an inspection.

**Washing:** When input down and feather is washed, the amount of input shall be registered before starting the process. After the process, the amount shall be measured and registered again. The difference shall be registered as production loss.

**Sorting:** When the inputs are sorted (i.e. down and feather are separated and/or down is sorted into different qualities) the amount of input shall be registered before starting the process. At



the end of the process, the quantities of feather and each down quality shall be recorded. The registered output shall be deducted from the total input. The difference (production loss) shall be recorded.

**Recipe making:** When making a recipe of down, the composition of the recipe shall be registered. The quantity used of each input shall be registered in order to calculate the content claim of certified down and feather in the recipe. The used quantities of each input shall be deducted from the storage quantity. The method of recipe making shall be described in a procedure that assures traceability of certified inputs, in order to maintain a content claim. Each production batch of a recipe needs to get a unique lot number, which is also mentioned on the TC when it leaves the facility. In the records, this lot number shall be linked to the lot number(s) of input materials.

**Level: CRITICAL MAJOR**

## C2 - Managing CCS goods during production

C2.1 Written procedures shall be in place to enable the organization and Certification Body to ensure the integrity and identity of RDS products as they move through production. Companies shall maintain a documented system plan that describes the processes, including the points of risk and the material flow diagram.

**Guidance:** Once certified products are mixed with non-certified products (it becomes a certified product), the new blend shall receive a unique lot number identifying the ingredients in the recipe including the percentages of each ingredient. Administration of the site shall enable the CB to track the source of each ingredient in the recipe (identify how much % is certified in the blend).

At each production step there shall be documentation that is linked to the incoming goods (down and feather or RDS products shall be clearly identified and tracked as they move through production. This may include, but is not limited to, direct labeling of down and feather or RDS products, machines, storage vessels, or storage areas.)

**Level: MAJOR**

C2.2 At each production step there shall be documentation that is linked to the incoming goods.

**Guidance:** Before handling of the certified goods, it shall be confirmed that the goods match with what is described in the documentation.

**Level: MAJOR**

C2.3 Down and feather shall be kept separately from non-certified products. RDS products shall be separated from other products of the same type. Extra precautions shall be taken where waterfowl, down and feather or RDS products are being shipped, stored or produced alongside non-waterfowl down and feather or products of the same type to ensure that no confusion or substitution occurs.

**Guidance:** In some cases it may be necessary for the Claimed Materials or CCS products to be labelled directly, while in others, it will be sufficient for the machines, carrying vessels and storage containers or areas to be clearly signed. It may also be possible that no identification is needed, as in the example of a spinning mill that only processes 100% organic cotton.



Labels and signage must be visible and understandable by all workers operating in the area.

Final products that are to be sold to consumers may not have the CCS logo or name on them.

**Guidance:** Separation shall be sufficient to prevent commingling or substitution of the certified products with other down and feather products.

**Level: MAJOR**

### C3 - Packaging and Transport

The organization shall ensure that the products containing waterfowl down and feather be transported to other units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles that are closed in such a manner that substitution of the content cannot be achieved without manipulation or damage of the seal. All shipments of RDS products shall have a label stating:

- the name and address (city and country) of the producer or, where different, of the owner or seller of the product
- the name and address (city and country) of the consignee
- the name of the product, including a reference to the waterfowl, down and feather content (expressed as a percentage) of the product being shipped
- the name of the transporter
- reference to the Responsible Down Standard, the name of the Certification Body and the identification number ( or project number) given to the project by the Certification Body
- the lot identification number
- quantity of products
- date of shipment

Alternatively, this information may be presented on an accompanying document, as long as such document may be undeniably linked with the packaging, container or vehicle of the product.

**Guidance:** CCS and non-CCS products may be shipped or transported in the same container, as long as there is sufficient identification attached to the CCS products in a way that does not allow the identification to be easily moved to other products.

**Guidance:** Name of the product and description: type of down (color and fill power)

**Quantity:** weight of the down and feather products.

**Label or accompanying document shall be undeniably linked with the packaging, container or vehicle of the product.**

**Level: MAJOR**

### C4 - Storing Products

The storage of products shall be managed in order to segregate waterfowl, down and feather and ensure easy identification of lots. Procedures shall be in place to prevent commingling or substitution



of the waterfowl, down and feather with other materials or products. All warehouses for each production step shall be listed and inspected as part of the overall certification process to ensure protection from commingling or confusion with other materials. All other warehouses (e.g.: in transit) shall be listed and may be inspected at the discretion of the certifier.

**Guidance:** Administration of site shall demonstrate the balance between incoming, outgoing and stored products. Loss shall be taken into account.

This shall include updated records on stored products. Example: there is in stock 100 kg lot A (certified) and 70 kg lot B (non-certified). New recipe is made from 30 kg of lot A and 30 kg of lot B. The blend is 60 kg and has 50% certified down content (if no production loss). It is important, that the facility registers deduction from stock and registers that 70 kg left of lot A and 40 kg of lot B.

**Level:** MAJOR

### C5 - Labeling to the CCS

**Guidance:** The CCS logo cannot be used for product-specific communication to consumers. Its primary use is for business-to-business communications. Certified Organizations may use the CCS name and/or logo in their written or electronic marketing or transaction documents to other organizations, as well as internally. For the purpose of maintaining the clear identity of CCS products, the CCS logo may also be used to identify certified products or their containers as they move through the supply chain.

The CCS name may be used in off-product communication by Certified Organizations to refer to verification of product claims supported by the CCS. For example: a website or catalogue copy explaining the Organization's efforts to ensure accuracy of its product claims for a range of goods.

Retailers selling to end consumers only, and not to other retailers, are not required to be certified. If a brand/retailer sells to other retailers, they must be certified to the standard in order to maintain the integrity of the Claimed Material content in the final product.

### C6 - Products suspected of not satisfying the requirements of the CCS standard

When an Organization suspects that an input that they have purchased or a product that has been manufactured is not in compliance with this Standard, they shall withdraw references to the Claimed Material content of the related product until they can confirm the valid certification of the product, and shall inform the CB immediately.

**Guidance:** The CB is responsible for responding to tips and complaints about fraudulent products or services with appropriate action and due diligence. If it is found that the Organization is knowingly and/or repeatedly operating with non-conformities or purposely violates the requirements of the standard, the CB must suspend the Organization's certification status and inform TE. The Organization will be allowed to re-apply for certification two years after the date of the suspension.

If certification is terminated for any reason (voluntary or enforced), or if it is reduced in scope, the CB shall collect all applicable certification documents, and ensure that any references to the



standard are ceased for the affected goods. Any shipments with valid TCs (ie: issued before the termination of certification) may be sold as certified, at the discretion of the CB. The CB must inform Textile Exchange immediately of the termination.

## D1 - Tools and Resources

### D1.2 Questions and Additional Information

For questions or additional information about the CCS please contact: [integrity@TextileExchange.org](mailto:integrity@TextileExchange.org).

**Guidance:** If you want to comment on TE standards or submit a complaint about a certified organization, a certification body, an accreditation body, or any related party, you may email [Integrity@TextileExchange.org](mailto:Integrity@TextileExchange.org) and TE will investigate with the appropriate parties.

## D2 – Sample Documents

### D2.4 Transaction Certificate Policy Guidelines

This policy document has been updated with a revision to allow Multiple Shipments per TC, under the following guidelines.

**Multiple Shipments on a TC:** It is permitted to issue a single TC that covers the information of multiple shipments as long as the following conditions are met:

- a. The CB must give permission in writing to the seller to use a single TC for the agreed number and/or time period (either for the individual case or as a procedural rule).

- b. The seller must notify the buyer of the time period for which the TC will be open, giving the buyer sufficient time to respond if any change is required. At any time, the buyer has the right to require a shorter time period or a TC for each shipment and to receive written proof that the seller's CB has given permission for multiple shipments against their TCs.

**Guidance:** The buyer should discuss with his own CB: for example, the buyer may purchase inputs (intermediates) from a company that is supplying on an open TC, use these inputs to produce their own goods, then sell them before the inputs' TC is closed. The CB may not be willing to issue the TC for the buyer's goods being sold without first having confirmation of the certification of the incoming goods. The CB may also require written confirmation that the multiple shipment practice was agreed to by the CB of the seller.

- f. The maximum time period that a single TC can cover is 3 months.

**Guidance:** The decision of a time period requires a balancing of costs and risks. While using a single TC for multiple shipments should reduce the yearly cost of TCs, it does mean that there will be periods of time during which goods being sold have not yet been verified by a CB. This will be of concern to the buyers of the product. While a time period of 3 months may be reasonable in some situations, it is assumed that a more realistic timeframe would be closer to 1 month in most cases.





## RDS Interpretations

### Appendix A - Audit Procedures

#### A1.2 Subsequent years' certification:

- Up to 1/2 announced on-site audits
- At least 1/2 semi-announced (maximum 72 hour notice) or unannounced on-site audits (2 month window)
- Minimum 5% confirmation visits on all farms; at least 10% confirmation visits of high-risk farms.

**Guidance:** In practice, a CB is to plan for confirmation visits of at least 10% of all farms; with farms chosen for the confirmation visit based on risk. If the CB arrives on the farm and is able to complete a full audit, that can also count for an unannounced audit. The total number of farms visited in a given year must be at least 105% of all certified farms.

### Appendix C - Contract Farm Group Certification

#### Definitions

*Contracted Farms:* Farms that are raising waterfowl on behalf of a separate company or individual (the contractor, e.g. a trader, slaughterhouse, or master farm). In order to qualify as contract farming, the following must be true:

- The contractor shall provide all inputs: eggs or hatchlings, food, medication, veterinary care, logistics
- There is an agreement that the contractor will buy the birds from the contract farm, and that the contract farm will sell the birds to the contractor.

**Guidance:** In some cases, the contractor may not buy all of the birds from the contract farm. It should be clear that the birds sold separately by the contract farm are not considered RDS Certified.

**Contract Farm Group Certification shall be assessed separately from the RDS certification of the contractor. For example, if a slaughterhouse is the contractor then they will have two independent scopes on the scope certificate, one for slaughter and one for the contract farms.**

#### C1 Guidelines for use

C1.1 The standard allows for group certification of contracted farms supplying one company or individual (the contractor). These farms are contracted by the company to raise waterfowl for direct sale to the company. The contractor shall be considered the Certified Organization.

**Guidance:** This can also apply when there are multiple contracted farms under a single owner.

C4.3 In evaluation of the ICS the CB shall determine whether:



a. All internal control documentation is in place.

**Guidance:** Internal documentation shall include training records of the ICS Group members.









