



BCI Consultation Report

Production Principles & Criteria 2.0

Consultations from July 2008 to June 2009 – Phase II

www.bettercotton.org

Orientation:

This consultation report outlines the comments received during the second consultation period on the Production Principles and Criteria 1.0 (July 2008 to June 2009), together with the BCI response to these comments. The consultations were conducted with the Regional Working Groups in Brazil, India, Pakistan and West and Central Africa; Advisory Committee; Better Cotton partners; Experts, Friends and the Public.

The Better Cotton Initiative would like to thank everyone who has contributed their time, effort, and knowledge towards the development of the Production Principles and Criteria. We look forward to continuing to enhance the Better Cotton System with your support and input.

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INTRODUCTION

This Consultation Report should be read in conjunction with the following documents:

1. *Production Principles and Criteria 2.0*; and
2. *Production Principles and Criteria 2.0 Explained*.

These documents, as well as further information about the Better Cotton System can be found on the BCI website (www.bettercotton.org) and in the Better Cotton System Information Pack.

The *Production Principles and Criteria 2.0* have been developed on the basis of input and consultations between July 2008 and June 2009, with Regional Working Groups in Brazil, India, Pakistan and West & Central Africa; BCI Advisory Committee members; Better Cotton Partners; Experts; Friends; and publicly.

The purpose of the consultation process in Phase II was to cooperatively develop the Production Principles and Criteria that would define 'Better Cotton', and develop a more grounded understanding of how growing Better Cotton might be realised in the different farming contexts of the world.

The consultation carried out over these 12 months was undertaken through the regional working group meetings, multi-stakeholder workshops, face-to-face meetings, telephone calls, and emails. During this consultation period stakeholders from around the world, throughout the supply chain, and across sectors provided constructive input, challenging questions, and supportive ideas.

The finalisation of *Production Principles and Criteria 2.0* was a key outcome of BCI's Consultation Period in Phase II, and the Production Principles are listed below:

Production Principles	Better Cotton is produced by farmers minimise the harmful impact of crop protection practices
	Better Cotton is produced by farmers who use water efficiently and care for the availability of water
	Better Cotton is produced by farmers who care for the health of the soil
	Better Cotton is produced by farmers who conserve natural habitats
	Better Cotton is produced by farmers who care for and preserve the quality of the fibre
	Better Cotton is produced by farmers who promote Decent Work

NB: In version 2.0, the Enabling Mechanisms are no longer included within the Production Principle and Criteria. They are now included in a separate document, *Farmer Support*, to better reflect an important distinction between the two concepts: **Production Principles** focus on farmers' production practices, i.e. on the farmer's responsibility on the farm, while **Enabling Mechanisms** focus on the support that needs to be provided to farmers to enable them to implement better production practices, i.e. on what support farmers need to enable them to grow 'Better Cotton'.

The *Production Principles and Criteria 2.0* will be reviewed in 2012 after the first 3 years of field implementation.

Comments and Responses

BCI has received a range of comments, both formally and informally, over the 12 month consultation period. However, this report does not claim to be fully comprehensive of all the feedback received.

Further details of comments and reports of discussions in Regional Working Group meetings that were part of this consultation process are available to download from:

http://www.bettercotton.org/index/31/regional_processes_-_the_role_of_regional_working_groups_in_bci.html

The comments and responses are structured below under the following headings: General, Crop Protection, Water, Soil, Natural Habitat, Fibre Quality and Decent Work. Not all issues were commented upon, and only those Production Criteria that were the subject of explicit comments are listed below under their respective Production Principle headings.

General

Comments Received	BCI Response
"It should be recognised that most smallholder farmers are food insecure and unable to bear the risks associated with adopting new practises and tools without long-term support in terms of training and guaranteed increased profits as an incentive. ... The risks associated with the adoption of new practises can also be reduced by ensuring that the new version of BCI's principles takes account of smallholder farmers' need for food security."	Reference will be made to the need to take this issue into account during field implementation of Better Cotton in the documentation that will be provided to help support implementation partners.
It would be useful to know more about the intended scope and reach of BCI. On page 11 reference is made to the BCI's "playing a coordinating role" in providing support to cotton farmers. This would seem to be too ambitious a goal, particularly as there are no target or pilot countries identified and the area of impact is the global cotton industry. BCI may consider piloting the system in a number of countries, drawing lessons from this and developing a plan for a second stage to bring it to scale.	Further details about the intended scope and reach of BCI are detailed in a number of documents, including <i>About BCI</i> and the <i>Better Cotton System Information Pack</i> , available on the BCI website. The BCI has a number of initial focus countries: Brazil, India, Pakistan and West & Central Africa (Burkina Faso, Mali, Senegal, Cameroon, Benin and Togo)
On page 2, point 2), reference is made to the creation or support for a Supply Chain System that works for all actors in the value chain. There would seem to be some confusion of the terms value and supply chains; it may be better to use the more comprehensive term value chain consistently, or at least explain how the two are used in this context.	To avoid confusion, the BCI has adopted the words 'supply chain' to describe the movement of cotton from enterprise to enterprise, and no longer uses the term 'value chain' in the context of describing how Better Cotton will move from the farm into the market: see the Information Pack document: <i>Supply Chain: Taking Better Cotton to the Market</i> . Nonetheless, BCI is vitally interested in understanding how, how much and where value is created along the supply chain, and this issue will be kept to the fore during the initial phase of implementation.
On page 4, there are a number of bullet points of "principles of operation". It is not clear how these principles are related to the Production Principles. Reference is made to non-discrimination here but not to any of the other Fundamental Principles and Rights at Work, which could be interpreted to mean that the other Principles are not as important	There are two distinct types of principle referenced in the Better Cotton System: 1. The Production Principles detail the fundamental requirements for growing Better Cotton, and focus on the issues that farmers need to address on their farm to grow Better Cotton. 2. Now that the BCI has established itself as a Membership Association under Swiss law, the principles of operation referenced in Version 1.0 are called Principles of Participation. These Principles of Participation are the broad principles to which members joining the BCI Membership Association commit to follow. They are intended to be the key commitments made by members that will enable the BCI to operate and achieve its long-term objectives. They include high-level principles applicable to all members, as well more detailed obligations, tailored to various categories of membership (for example, producer organisation, retailer / brand). Adherence to the Principles of Participation by members is governed by Article 5 of the Statutes of the BCI Association, which provides for sanctions in cases where members fail to fulfil their commitments as described by the Principles of Participation.
Very good to include principles for operation for all BCI members. However the effectiveness of these principles is limited if the list does not cover some points that are actually related to the trade of cotton, if a complaint mechanism is not	See above re Principles of Participation and the requirement that members of the BCI Association follow the Principles of Participation and the obligations specific to a member's membership category. Non-adherence to the Principles of Participation is grounds for expulsion from membership of the BCI, and a formal

<p>installed and a policy of membership evaluation is not related to the complaint mechanism. For example, an often heard complaint from cotton producers is that payment does not occur according to contract terms. These kinds of practices should not be possible in a system that promotes sustainable practices. It is therefore proposed to include that all BCI members adhere to also good trading practices.</p> <p>If BCI members see, hear or experience behavior from members that goes against these general principles of operation they should be able to voice this to an independent and objective grievance or complaint committee. This requires the BCI to develop a complaint mechanism (procedure and structure) and policies to take corrective actions</p>	<p>complaints mechanism has been established to address complaints against members. The issue of 'good trading practices' will also be explicitly addressed during implementation.</p>
<p>Regarding the summary of Global Principles, there are currently six principles; none seem to directly address the economic pillar of sustainability. It is suggested a seventh Production Principle: "Better Cotton is produced by farmers using economically viable production practices." Open to suggestion on wording, but the concept of economic sustainability should be included in the Principles.</p>	<p>This issue was raised during the first round of consultation, and the comment then was that the BCI is keen to avoid making profitability a requirement or conditionality for 'Better Cotton' status, given that it is one of the objectives of the initiative. Assessment of the economic impact of implementing 'Better Cotton' will be one of the major focuses of the field projects planned in each region.</p> <p>Nevertheless, the BCI did consider making economics the focus of a production principle. However, the rationale for not doing so was that making it a principle — i.e. an outcome expected to be achieved by the farmer — could be interpreted as saying that unless a farmer makes more money then they cannot be a better cotton farmer - which in effect could be seen as passing judgement on one of the long-term issues that the BCI is seeking to address, farm profitability. Given that support is required for the farmers in a range of areas to address the issue of profitability, it was decided that the focus should be on farm profitability as one of the ultimate objectives of the BCI, rather than as an assessable principle. In other words, the BCI will be judged on its success in achieving this outcome, not the farmer; and data collection and monitoring of this will be a critical component of implementing the Better Cotton System.</p> <p>Thus one of the critical roles of the implementation phase will be to assess the economic impact of growing/implementing better cotton - to ensure that the implementation is in fact having the desired effect of improving farm profitability. This information will be used to both/either adjust the approach accordingly as well as to help promote the economic advantages of growing better cotton.</p> <p>The BCI agrees that economic sustainability is essential, and this is reflected in both the Vision (... <i>to make cotton better for the people who produce it, ...</i>) and the following Long-Term Objective of the BCI: <i>To demonstrate the inherent benefits of better cotton production, particularly the financial profitability for farmers.</i></p>
<p>In the document the environmental, social and economic (quality of fibre) principles are presented. What is missing is the principle that BCI leads to the increase of profitability as it is key to the success of the BCI. Therefore BCI should add the principle of increase in profitability</p>	<p>See previous response, above.</p>
<p>Much of the environmental and economic principles have to do with Good agricultural principals (GAP's) and Better Management Practices (BMP's). It is these practices that will make the producers more effective, more efficient, increase yields, bring down costs, improve quality, etc. But these terms or concepts are not mentioned in this document. We propose to mention them more explicitly</p>	<p>Agreed. These terms are discussed in the document <i>Production Principles and Criteria 2.0 Explained</i> and are captured by the BCI concept of 'National Guidance Material', the term used by the BCI for the various locally – adapted practices and tools available to support and help farmers achieve the Production Principles and Criteria, and thus be 'more effective, more efficient, increase yields, bring down costs, improve quality, etc'. The need for implementers to develop and / or collect, and share, National Guidance Material will be a requirement of implementing the Better Cotton System.</p>
<p>The document "Global principles, criteria and enabling environment" is built up in a logical way. The figure mentioned on page 2 indicates the most important elements. However not all elements are explained in the document leaving several questions about "How is the BCI going to do this" open?</p>	<p>The Better Cotton System has a number of discrete elements: 1. The Production Principles and Criteria; 2. Supporting Farmers; 3. Farm Assessment and Monitoring and Evaluation; 4. Supply Chain; and 5. The Membership Association. Please refer to the <i>Better Cotton System Information Pack</i> for a detailed description of each of these elements</p>
<p>We feel it is important that the BCI acknowledges the existence of other schemes and also takes it as part as its mission to cooperate constructively with other schemes.</p> <p>Proposal: Since the BCI system is in early stages of</p>	<p>The BCI recognizes the importance of collaboration, and of not reinventing the wheel. One of the strategic approaches of the BCI has been to build on the work of others, and at a practical level the BCI has been doing this through:</p> <ul style="list-style-type: none"> – Seeking the advice and input of programmes that are already running

<p>development the BCI can;</p> <p>1] Integrate in its mission that the BCI will strive for the continuous improvement of BCI farmers to more demanding and more rewarding codes and programs.</p> <p>2] Conduct a pilot to see how the BCI principles actually relate to other codes of conducts to see if (partial) cooperation and mutual recognition is possible.</p> <p>3] Look for options of multiple programs audits, multiple programs tools and manual, joint projects etc. (note: Iseal has conducted much work on these issues. We recommend the BCI to consider integrate this work)</p>	<ul style="list-style-type: none"> - Reviewing existing standards to ensure compatibility to the greatest extent possible - Engaging with ISEAL, reviewing their Codes and draft Codes, and participating in the ISEAL "Emerging Initiatives" process. Once the Better Cotton System is finalized in its entirety, the BCI will then be in a position – using the learnings from ISEAL – to explore the issues listed in comment 3] - Seeking to identify existing projects that the BCI can collaborate with for implementation - Seeking to build on existing work and projects, e.g. by commencing an information database to ensure that information on more sustainable cotton production practices is not lost.
<p>On page 2, context of global cotton production: According to ICAC and FAO estimates, there are about 300 million people employed in cotton production. FAO estimated in 2002 that about 110 million households were involved in cotton production. Also, ICAC estimate that about 80 countries produce cotton on a commercially significant scale. If you count every island nation and research plot in the world, there are about 120 countries that produce some cotton.</p>	<p>The context of global cotton production has been modified and is now discussed in the document <i>About BCI</i>.</p>
<p>On page 2, context of global cotton production, the assertion that cotton is a water-intensive crop is challenged. Cotton is grown in semi-arid and water-scarce areas precisely because it is able to grow and produce commercially viable yields in regions of limited water availability. What does "water-intensive" mean; how is this defined? The reason cotton is such an important crop in West Africa is because other crops cannot be grown in those areas. Cotton is grown in irrigated areas such as Australia and West Texas because it produces the highest commercial value per unit of water</p> <p>Consultation round 1 comment: <i>It was suggested that there be a change in verb from "is" to "can be" in the sentence "Cotton can be a water-intensive and pest-sensitive crop". Cotton is grown in parts of India, Argentina, Shandong and West Texas where the water supply is limited because cotton can generate some harvestable crop on less than 30 cm of available water. This level is very low for a summer annual crop - Change was accepted</i></p>	<p>The context of global cotton production has been modified and is now discussed in the document <i>About BCI</i>.</p>
<p>BCI should consider the issue of GM cotton in its production principles and criteria. It is suggested that BCI make explicit reference to the use of GM cotton.</p>	<p>The BCI agrees that there should be a reference to transgenic (GM) cotton, and furthermore that there are two issues that need to be considered within the issue of managing transgenic technology:</p> <ol style="list-style-type: none"> 1. Proper management to ensure that it performs as intended (e.g. resistance management) 2. Proper management to minimise the risk of adversely affecting neighbours <p>The approach adopted will be to: 1. Ensure that the need to manage the above issues is captured by the concept of IPM as defined for the purposes of Better Cotton, through inclusion of the following principle within the principles that should govern an IPM Programme: <i>The interests of, and impacts on, producers, society and the environment are taken into account in the choice of crop protection techniques</i>; and 2. As a mainstream initiative, BCI will work with all farmers, including those who choose to grow transgenic cotton. The BCI has adopted a position of being 'technology neutral' with respect to transgenic cotton. This means that the BCI will neither encourage farmers to grow it, nor seek to restrict their access to it, provided it is legally available to them. The focus is on enabling farmers to make informed choices about the available technologies to use, and how to use them appropriately. BCI encourages informed decision making at the farm level, to change practices that ensure improved outcomes - environmentally, socially and economically.</p>
<p>It was suggested that the phrasing of the various criteria could be looked at to ensure that they were worded in a consistent manner, with more focus on the requirements of the farmer</p>	<p>Agreed, certain criteria re-worded so they are structured in a more consistent manner, e.g. 'Water use is optimized' changed to 'Water management practices are adopted that optimise water use'. See comments against individual criteria for re-wording.</p>

Crop Protection

Comments Received	BCI Response
General	
On page 5 on crop protection, the principle is now less satisfactory than the original version. Version 1.0 of the statement of principle is a step backward from earlier versions. What "crop protection practices" are being referred to here, other than the use of pesticides? To talk of minimising harmful impact implies some harm is inevitable - which is not correct. It is suggested to revert to the original version	<p>The BCI considers that zero impact is the greatest minimisation possible, so does not agree that reference to minimising harmful impact implies that some impact is inevitable.</p> <p>This issue regarding the focus of the wording of the principle (crop protection versus pesticides) was debated extensively prior to the finalisation of Version 1.0, with arguments put forward for both versions. Ultimately, the current wording was adopted as it is in line with the overall approach of the other principles (particularly soil, water and habitat). These focus on the issue to be managed (i.e. the crop) rather than the tools to manage those issues (i.e. pesticides). That is, it was considered more appropriate to focus on the broader issue of crop protection than one of the tools for crop protection (albeit a major one). One analogy provided was that a focus on pesticides instead of crop protection would be like focussing on ploughs instead of soil management.</p> <p>Other crop protection techniques (apart from pesticides) include the use of bio-control agents, pheromones and hormones; plant breeding and appropriate cultivar selection; various cultural and mechanical techniques; and the use of genetically modified plants.</p> <p>A focus on crop protection was also considered important to ensure that appropriate attention was paid to the most important criterion under crop protection, adoption of IPM, rather than immediately focussing on pesticides, which is counter to various generally-accepted elements of an IPM programme, such as a focus on preventative measures and pest build up, consideration of non-chemical means of control, and use of pesticides as a last resort.</p>
An Integrated Pest Management is adopted	
It is important for crop protection that pest control is based on damage thresholds (whether chemical pesticides or bio-pesticides). But I feel that this IPM approach disappears in the final documents and it is important that this is revisited	<p>The BCI agrees that IPM is critical, and the need to implement an IPM Programme is the first criterion detailed under the crop protection principle, and is a Minimum Production Criterion.</p> <p>Details on the key elements of an IPM Programme have been added to the Criterion itself, and further information about these elements – including the use of thresholds – have been included in the document <i>Production Principles and Criteria 2.0 Explained</i></p>
During the WCA RWG it was noted that the discussion under IPM in Version 1.0, though stating that pesticides should be used as a last resort, was nevertheless very much focussed on chemical treatment, or alternatives to chemical treatments. It was suggested that the discussion should include reference to preventative measures that are available to reduce the risk of a pest attack in the first place	Agreed; reference to preventing the build-up of pest populations has been listed as one of the key elements of an IPM Programme, and the discussion on IPM in the document <i>Production Principles and Criteria 2.0 Explained</i> includes reference to the importance of preventative measures.
It was suggested that the key elements of what constitutes an IPM Programme should be explicitly included in the wording of this Criterion	Agreed; the Criterion now lists 5 key elements of IPM: (i) growing of a healthy crop; (ii) prevention of build-up of pest populations; (iii) preservation and enhancement of populations of beneficial insects; (iv) regular field observations of the crop's health and key pest and beneficial insects; and (v) management of resistance
Use of the following pesticides: those categorised as WHO Class I, or are listed by the Stockholm or Rotterdam Conventions and endosulfan, is phased out over time, with the phasing out timeline based on the availability of better alternatives and ability for the risk to be properly managed	
It was suggested that rather than phasing out use of pesticides in the categories of Stockholm and WHO Class I, that there should be no use of them at all	<p>Agreed that there should be no use of Stockholm-listed pesticides, and this is reflected as a stand-alone criterion in <i>Production Principles and Criteria 2.0</i>.</p> <p>With respect to phasing out WHO Class I, the BCI now provides clearer guidance on the development of phasing out timelines, and will ensure that the progressive phasing out of the most hazardous pesticides is addressed as a priority issue during the first 12 months of implementation of the Better Cotton System.</p>

<p>Pesticides are used on crops for which they are legally registered for use, and are correctly labelled</p>	
<p>The wording of this criterion has caused a little confusion regarding its intent; it was also suggested that a) reference be made to nationally registered (to make it clear that the pesticide has to be registered in the country in which it is being used, so as to avoid cross-border use) and b) that reference be made to labels needing to be in the national language (to avoid pesticides being sold that while registered may have unreadable foreign language labels)</p>	<p>Agreed. The criterion has been reworded to include the references to nationally registered / national language, and to make it less ambiguous: <i>Only pesticides that are:</i> <i>i) correctly labelled in the national language; and</i> <i>ii) nationally registered for the crop being treated are used.</i></p>
<p>WCA RWG (during minimum requirement discussions), while agreeing that this reflected the ideal, said 'difficult to measure and adhere to', and suggested that this be re-phrased to read "Products used are those accepted and recommended for cotton" (noting that authorities have to provide resources for the protection of other crops)</p> <p>It was also noted that there is no difference between BCI and other initiatives, and that it is important to clarify what exactly are dangerous pesticides, and to be precise</p>	<p>One of the fundamental premises of the BCI is that growing Better Cotton respects national and other applicable law. Thus this specific requirement that is based on respecting the national law regarding use of only legally registered pesticides cannot be made less stringent so as to allow use of pesticides that are not legally available.</p> <p>Regarding the need to clarify what are 'dangerous pesticides' the BCI agrees that this is essential, and will work to ensure that those implementing the Better Cotton System have this information available for farmers as soon as possible.</p>
<p>One of the sub-groups in the India RWG suggested (as part of the discussion on minimum requirements) that "Only the registered pesticides recommended (including non-use of pesticides whose use is recommended against) by the State Agencies / SAU's, to be used in accordance with IPM Principles; a scientific approach must be followed by farmers</p>	<p>As Criteria are designed to be global, it is not possible to adjust them to take into account regional variations; these regional variations can be taken into account as part of field implementation of the criteria, the appropriate time for incorporating local contexts with the requirements of growing Better Cotton.</p>
<p>Another of the sub-groups in the India RWG suggested (as part of the discussion on minimum requirements) that 'Should comply with CIBRC on application'</p>	<p>This concept, of adhering to regulatory requirements, is captured under the criterion "Pesticides are applied in appropriate climatic conditions, according to label directions, and or manufacturers' directions, with well-maintained equipment".</p>
<p>Pesticides are only applied by persons who are: healthy, skilled and trained in the application of pesticides, wearing appropriate protective and safety equipment, 18 years or older, not pregnant or nursing</p>	
<p>Strongly encourage BCI to consider including in this section the key preventive and protective measures for the sound management of chemicals, taken from paragraph 7(2) of the ILO Safety and Health in Agriculture Recommendation, 2001 (No. 192). The relevant text is included in italics, as follows:</p> <p><i>7. (2) In particular, preventive and protective measures to be taken at the level of the undertaking should include:</i></p> <p><i>(a) adequate personal protective equipment and clothing, and washing facilities for those using chemicals and for the maintenance and cleaning of personal protective and application equipment, at no cost to the worker;</i></p> <p><i>(b) spraying and post-spraying precautions in areas treated with chemicals, including measures to prevent pollution of food, drinking, washing and irrigation water sources;</i></p> <p><i>(c) handling and disposal of hazardous chemicals which are no longer required, and containers which have been emptied but which may contain residues of hazardous chemicals, in a manner which eliminates or minimizes the risk to safety and health and to the environment, in accordance with national law and practice;</i></p> <p><i>(d) keeping a register of the application of pesticides used in agriculture; and</i></p> <p><i>(e) training of agricultural workers on a continuing basis to include, as appropriate, training in the practices and procedures or about hazards and on the precautions to be followed in connection with the use of chemicals at work.</i></p> <p><i>Also, the general thrust of the wording from paragraph 5(e) of</i></p>	<p>Much of this detail is included in the document <i>Production Principles and Criteria 2.0 Explained</i> and / or is best included in the locally-specific guidance material that will be required to support farmers to meet this Criterion. Many of the points noted are very specific, and should be covered by the generally broader requirements detailed in the BCI Criteria:</p> <p>In particular:</p> <ul style="list-style-type: none"> - (a) This is generally covered by Criterion 6.13; the requirement that PPE should be provided at no cost to the worker will be dealt with at the implementation level) - (b) This is generally covered by 1.7 and 6.13 - (c) This is generally covered by 1.7, 1.9 and 6.13; the issue of obsolete pesticides can be dealt with at an implementation level, as it is a very region-specific issue - (d) This is generally covered by the requirement to abide by National law - (e) This is generally covered by 1.4, 1.6, 6.11 and 6.13 - Regarding a general requirement to protect people on and around site from a range of agricultural activities (not just pesticide applications, but e.g. also livestock waste ...), this is generally covered for pesticide use under Criteria 1.3, 1.4, 1.5, 1.7 and 1.8; for water under 2.2; for soil under 3.3 and for habitats under 4.1 and 4.2. <p>In addition, the Criterion dealing with cleaning and handling of pesticide containers has been amended to make it broader to include the cleaning of pesticide application equipment.</p>

<p><i>Recommendation No. 192 could be very helpful:</i></p> <p><i>(e) appropriate measures to protect persons present at an agricultural site, the population in the vicinity of it and the general environment, from risks which may arise from the agricultural activity concerned, such as those due to agrochemical waste, livestock waste, soil and water contamination, soil depletion and topographic changes;</i></p> <p>Such measures should be required of large farms and be strongly encouraged for "employers with a significant number of employees" (BCI wording from p. 9).</p>	
<p>Storage and handling of pesticide containers avoids environmental and human exposure</p>	
<p>In addition, on page 6, the second and fourth bullet points refer to "pesticide containers", whereas a broader reference to the chemicals themselves would be more appropriate. Bullet point 2 "Storage and handling of pesticide containers avoids environmental and human exposure" could be reworded / expanded along the lines of Art. 13 in Convention No. 184 on Safety and Health in Agriculture, i.e. "the preparation, handling, application, storage and transportation of chemicals"... avoid environmental and human exposure. There should be additional text in that bullet point on the need to ensure that agrochemicals are properly labelled with essential information regarding their classification, the hazards they present and the safety precautions to be observed. Labels should be easily understandable for workers. Bullet point 4 could be reworded to include a reference to "chemical waste, obsolete chemicals and used chemical containers"... rather than just "used pesticide containers".</p>	<p>The BCI has decided not to address every risk or issue that may be associated with growing cotton. The Production Principles and Criteria focus on 6 issues that have been identified and confirmed during the consultation phase as the most significant impacts to address at a global level.</p> <p>This section is focused on crop protection (and pesticides), and the BCI defines 'pesticides' broadly to include not only substances for controlling any pests, but also plant growth regulators, defoliants, desiccants, and products applied to protect the crop from deteriorating during storage and transport.</p> <p>The BCI addresses the issue of labels in a stand-alone criterion, requiring that they be correctly labelled etc., and also considers that this issue will be captured under relevant national legislation, the specific requirements of which can be detailed in the guidance materials developed to support farmers.</p> <p>The Criterion has been amended to make explicit reference to the need to ensure that cleaning (as well as storage and handling) of containers (and application equipment) also avoids environmental and human exposure. Again, the precise details as to how best achieve this will be detailed in the context-specific guidance materials developed to support farmers.</p>

Water

Comments Received	BCI Response
<p>Water use is optimized</p>	<p>Wording has been amended in light of suggestion to re-word certain criterion to make them generally consistent in their phrasing: <i>Water management practices are adopted that optimise water use.</i></p>

Soil

Comments Received	BCI Response
Soil management practices are used that maintain and enhance the structure and fertility of the soil	
<p>Page 7. Section "Soil"</p> <p>Under the section on "Soil management practices are used that maintain and enhance the structure and fertility of the soil." the single most important practice is missing - to maintain plant residue on the soil surface. This practice prevents the soil surface from eroding with wind or water movement and is the primary soil management practice responsible for long term soil health by preventing soil erosion. Just the opposite practice is recommended in this section "incorporation of crop residues". Especially for crops such as cotton which generate less crop residue than grain crops it is especially important to maintain crop and weed residue on the soil surface. No-till has been the best example of preventing soil loss by keeping plant residue on the soil surface. Extension of minimum tillage practices to developing country cotton farmers can have substantial benefits in yield stability and drought tolerance as both root health and rain water capture increase dramatically. An older cotton production practice was to bury crop residue for seedling disease sanitation purposes. The incorporation of crop residue is no longer needed when employing crop rotation and/or fungicide seed treatments. Suggest deleting "incorporation of crop residues". The text currently mentions "minimum tillage" which is good.</p>	<p>The reference to incorporation of crop residues has been removed as suggested. Explicit reference to the importance of minimum / conservation tillage, and of cover crops, has been included in the document <i>Production Principles and Criteria 2.0 Explained</i>.</p>
Production practices are used that minimise erosion	
<p>The criteria under habitat conservation: "Water courses, drinking water sources and other bodies of water are protected from farm run-off" describes an expected outcome from managing erosion", so they could be added together to maintain a more focussed approach to specific issues.</p>	<p>Wording of this Criterion has been amended with the addition of one of the Criterion from the habitat principle in light of the suggestion to re-word certain criterion to make them generally consistent in their phrasing, and also to avoid some confusion in having two different principles consider issues related to soil erosion: <i>Management practices are adopted that minimise erosion, so that soil movement is minimised and water courses, drinking water sources and other bodies of water are protected from farm run-off.</i></p>

Natural Habitat

Comments Received	BCI Response
Water courses, drinking water sources and other bodies of water are protected from farm run-off.	<p>This Criterion has been amalgamated with the soil erosion management Criterion under the soil management principle (see above)</p>
Biodiversity on and surrounding the farm is enhanced	<p>Wording amended in light of the suggestion to re-word certain criterion to make them generally consistent in their phrasing: <i>Practices are adopted that enhance biodiversity on and surrounding the farm.</i></p>

Fibre Quality

Comments Received	BCI Response
Practices are adopted that maximize the fibre quality	Now <i>Management Practices</i> are adopted that maximize the fibre quality to maintain consistency between Criteria
Seed cotton is harvested, managed, and stored to minimise contamination and damage	The Criterion has had the word trash added, to distinguish between trash (natural leaf matter) and contamination: <i>Seed cotton is harvested, managed, and stored to minimise trash, contamination and damage.</i>
Other	
On page 8, under the heading of Fibre Quality, there is a reference to the grade of cotton. On page 4, under Terminology, BCI uses the word quality to refer to instrument values. Grade and instrument values are two different concepts. In three of the BCI regions, India, Pakistan and West Africa, farmers sell seed cotton, and instrument values are not applicable to seed cotton. In Brazil, farmers sell cotton and use instrument values. We need to differentiate between the two systems when discussing quality	The BCI has explicitly defined 'quality' broadly as the suite of characteristics that are important for determining the spinning value of cotton. These include staple length, length uniformity, strength, micronaire, short fibre content, colour, spottiness, stickiness, neps, contamination, trash content etc. Thus for the purposes of the BCI, it includes both intrinsic fibre characteristics (generally governed by the interaction between genotype, seasonal conditions and farm management), such as length and strength, and extrinsic properties, such as the level of contamination. References to the various means used to assess the different aspects of quality have been removed to avoid confusion.

Decent Work

Comments Received	BCI Response
On page 4, point 6), it is not clear why there is no reference to farmers promoting Decent Work, particularly as the Decent Work reference is included under the Production Principles, which are stated to be under the control of farmers.	This is a valid point, as not only the BCI has a role to play in promoting Decent Work but also farmers. It was agreed to use the same terminology as with other production principles. Version 1.0: 'BCI promotes Decent work' Version 2.0: 'Better Cotton is produced by farmers who promote Decent Work'
In the section on <u>Decent Work</u> (pp. 9-10), It is suggested to include under <u>health and safety</u> "All workers have the right to a weekly day of rest" as a principle applicable to both smallholder employers and large farm employers	The BCI has decided not to include this extra criterion at this stage. (it could however be considered in a later version) NB: The different criteria for Decent work constitute minimum and not maximum standards, and therefore should not be used to prevent employers from exceeding these standards
Any elements of paragraph 7(2) of Recommendation 192 that are not captured in the Crop Protection section, should be incorporated here as a requirement for large farm employers	See comments under Criterion "Pesticides are only applied by persons who are: healthy, skilled and trained in the application of pesticides, wearing appropriate protective and safety equipment, 18 years or older, not pregnant or nursing", above
It is suggested as a requirement for large farm employers, the following "Employers ensure that measures are in place to deal with accidents and emergencies, including first aid and access to appropriate transportation to medical facilities	Change accepted and included in version 2.0 Criterion 6.14: 'Employers ensure that measures are in place to deal with accidents and emergencies, including first aid and access to appropriate transportation to medical facilities'
A minor revision to the second bullet point is suggested under Health and Safety for large farm employers so as to read: "Employers identify work hazards, inform workers of safe work practices and adopt preventive measures to minimize hazards in the workplace. Employers maintain records of any accidents and occupational diseases."	Change accepted and included in version 2.0 Criterion 6.13: 'Employers identify work hazards, inform workers of safe work practices, and adopt preventive measures to minimise hazards in the workplace. Employers maintain records of any accidents and occupational diseases'
Under employment conditions, bullet point 3, we would suggest inserting the word "regularly" so as to read "Workers are paid regularly in cash	Change accepted and included in version 2.0 Criterion 6.17: 'Workers are paid regularly in cash, or in a form that is convenient to them'
In employment conditions, the second bullet point applicable to large farm employers might be reconsidered, since much temporary, seasonal and sub-contracted work might not be "equal" to ongoing work carried out by regular employees. One possibility might be to replace "for equal work performed" with "in relation to their period of employment'.	Change accepted and included in version 2.0 Criterion 6.22: 'Temporary, seasonal and (sub-) contracted workers receive equivalent benefits and employment conditions to permanent workers in relation to their period of employment'

With regard to the bullet point on overtime work, It is suggested to add "in accordance with the law or applicable collective agreements".	Change accepted and included in version 2.0 Criterion 6.24: 'Overtime work is voluntary and remunerated in accordance with the law or applicable collective agreements'
On page 9, under Child Labour, the third bullet point, there could be considerable variance regarding what is considered to be hazardous work. Reference to the determination of hazardous work, required of countries that ratify C182 on the Worst Forms of Child Labour, could be helpful. If such a determination has not been made in a given country, Recommendation 190 provides useful guidance. In fact, reference to C182 (and R190 if possible) is preferable even to C138 here	Comment included in <i>Production Principles and Criteria Explained 2.0</i> (see below) 'There is also broad agreement that hazardous work should not be undertaken by children and young workers aged under 18. The nature of activities in the cotton cultivation cycle which are deemed to constitute hazardous labour will be reviewed during implementation. As a minimum, the BCI Crop Protection Principle stipulates that pesticides are prepared and applied by persons who are 18 or older. In many cases, national legislation enumerates further tasks to be considered as hazardous work and, in line with the ILO Convention 182 which provides for states to establish scheduled activities which would give rise to Hazardous Child Labour if performed by a worker aged under 18, the BCI defers to national legislation for the definition of hazardous tasks other than pesticide preparation and application'.
Under the discussion of Decent Work, there are several issues for which it may be difficult to develop global principles. In many countries, there are strong gender distinctions; BCI will not be accorded much credibility if it tries to change those distinctions. Of the 300 million or so people involved in cotton production, at least half are illiterate in any language, and many do not speak a major written language. In these areas, written contracts or the maintenance of adequate records will not be realistic. In many villages, farmers exchange farm work for other favours, in essence a form of barter. Requiring that workers be paid in cash is not realistic in all countries. Farm workers tend to have lower levels of education than other workers, and there are location differentials in hourly wages almost everywhere. It is not realistic to expect wages and benefits paid to farm workers to equal those paid to workers in cities on average.	With respect to Decent Work we have made the distinction between smallholder family farms, smallholder employers and large farm employers with the intention of addressing the issues raised with respect to literacy, cultural gender issues, and education levels. With respect to paying in cash – it is also written in the criteria that this could alternatively be 'in a form that is convenient' to the worker (so for example this could be in kind for mutual work – should the farmer also be a worker, or with food, etc – as long as the worker agrees up front) With respect to written contracts, we recognise that in many circumstances this is simply not feasible which is why it is listed as (preferably written) contracts i.e. they could be verbal. For example in Brazil, verbal contracts are accepted by law. It is also worth noting that the national minimum wage does not equal the wages received by workers in cities - in most countries the minimum wage is usually below the average in cities and sometimes the national legislation indicate a wage according to the sector of work (i.e. industry, agriculture, etc).
Page 4. Section 5) and again on page 9. Under Decent Work. The definition of "smallholder employers" contradicts the definition of "smallholder" with regards to permanent hired labor. Since the definition of "smallholders" is based on not employing permanent labor, it does not make sense to have a "smallholder-employer" who is a "smallholder" BUT does employ permanent hired labor. One suggestion would be to drop the definition of "smallholder employers" as in this document it only appears in these definitions. Keep only the "smallholder" and "large farm" definitions on page 9.	The two definitions do not contradict each other.
Page 9. Section "Decent Work" Under the heading Freedom of Association, this bullet should agree with the top of page 10 and say "All workers and employers (including tenants, share-croppers and other categories) have the right, on a voluntary basis, to establish and develop organizations representing their interest".	The two sections are not in disagreement
Page 9: Under the heading Child Labor, the second bullet, large farms should be included in allowing children to work on family farms.	The BCI has decided not to follow this recommendation. The exemption for family smallholding (a small-scale cotton farm which is not structurally dependent on external hired labour) follows the logic of both the ILO Convention 138 and with other social sustainability standards in smallholder agriculture, including the recommendations of the ISEAL Alliance SASA harmonisation project. (The provisions of ILO C138 exclude 'family and small-scale holdings producing for local consumption and not regularly employing hired workers' (Art.5).)

<p>Page 10. Section "Decent Work" There are 9 bullets that only pertain to workers of Large farm employers. It is suggested all 9 of these worker rights should be encouraged when they are also working for a Smallholder employer. For example the 4th bullet states "Employers identify and inform workers of work hazards, and adopt preventative measures to minimize hazards in the workplace and maintain records of any accidents and occupational diseases". This should be provided for all workers regardless of the size of the farm.</p> <p>Also, It is suggested adding these words to the end of Bullet 3 "for work related injuries". Free medical care for non-work related injuries is rarely provided by an employer; usually the employer and worker share in this cost.</p>	<p>The BCI has attempted to maintain smallholder-employment requirements to a minimum due to the need for a pragmatic approach to implementation. The BCI recognises that efforts to achieve progress will take place over time, in order to ensure that smallholders are not disadvantaged vis-à-vis larger producers in the first stages of implementation.</p> <p>For the second point, it is proposed to leave it as it is.</p>
<p>The criteria of decent work will be more applicable for estate workers. How will the BCI promote decent working conditions for smallholder farmers?</p>	<p>It is recognised that there are two important but very different perspectives on the labour rights component of Better Cotton. The first recognises that imposing impracticable codes on smallholders may simply serve to threaten their market position and economic viability. The second emphasises the most flagrant breaches of labour rights in cotton cultivation and calls upon BCI to recognise internationally-agreed labour standards as a core component of social sustainability, and to ensure consistency with other approaches to labour standards (such as FLA, ETI). The tension between these viewpoints has informed much of BCI's work to date: this is why the BCI adopts a differentiated series of Decent Work criteria, and acknowledges the vital importance of not excluding the most vulnerable producer communities, but rather working with them to achieve environmental and social change. It should be noted that all references to 'working conditions' relate only to employment situations (smallholder-employers and larger farms) – i.e. not to family-based smallholdings.</p>
<p>While the concept of categorisation of farms is accepted for the application of the decent work criteria, there was no agreement in the different RWG on how to categorise farmers into smallholders, smallholder-employers and large farms. In particular, it was not possible to define what constitute a 'significant' number of workers for smallholder-employers</p>	<p>How to categorise farmers will be defined at implementation level in the different areas where the BCI will be working in close collaboration with the various stakeholders. It is often not possible to make this categorisation at national level due to regional differences. Local level definition will have to be made during implementation.</p> <p>The document <i>Production Principles and Criteria 2.0 Explained</i> notes the following: 'For the definition of smallholder-employers, a 'significant number' is purposefully not defined numerically, as what is a significant number will vary according to regional context. Nor, for the same reason, are cropped area thresholds defined – although this method is used to define smallholder farming in some cotton-growing regions. The BCI does not want to impose arbitrary absolute numbers that do not recognise regional circumstances. Before implementing the Better Cotton System an assessment of the existing issues and needs of the community will be conducted allowing for a regionally specific categorisation of farmers based on the above definitions.'</p>
<p>The RWG in West and Central Africa and India indicated that the minimum age for hazardous work is too high and should be reduced.</p>	<p>The minimum age indicated reflect internationally-agreed labour standards that cannot be changed. However, the BCI understands that there is a lack of understanding on what constitutes hazardous work and the BCI has sought to clarify the concept in the document <i>Production Principles and Criteria 2.0 Explained</i>.</p>
<p>All RWG requested clarification on the definition of child labour: What are 'acceptable' forms and 'not acceptable' forms of work for children</p>	<p>The BCI has provided a better explanation of child labour in the document <i>Production principles and Criteria 2.0 Explained</i>.</p>

These *Production Principles and Criteria 2.0* will remain in place for the first 3-year phase of field implementation of Better Cotton. At the end of 2012 the entire Better Cotton System — including the *Production Principles and Criteria 2.0* — will be reviewed in light of the experiences and learnings of those 3 years.

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