



# BCI Consultation Report

## Global principles, criteria, enabling mechanisms

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Consultations from February 2007 to July 2008 – Phase I

[www.bettercotton.org](http://www.bettercotton.org)

**Consultations with:** Regional Working Groups in Brazil, India, Pakistan and West & Central Africa; Advisory Committee; Better Cotton Partners; experts; friends; public.

**Published on:** 7 July 2008

BCI is kindly funded by Steering Committee organisations, Better Cotton Partners, and:



Schweizerische Eidgenossenschaft  
Confédération suisse  
Confederazione Svizzera  
Confederaziun svizra

Swiss Confederation

Federal Department of Economic Affairs FDEA  
State Secretariat for Economic Affairs SECO

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*The Better Cotton Initiative would like to thank everyone who has contributed their time, effort, and knowledge towards the development of a system for 'Better Cotton'. We look forward to continuing to enhance the system with your support and input.*

BCI Steering Committee\*

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\*as at 30 June 2008

## Executive Summary

This Consultation Report should be read in conjunction with Version 1.0 of the Global principles, criteria, and enabling mechanisms (<http://www.bettercotton.org/site.php?9,36>) that make up a key component of the 'Better Cotton' System.

Version (1.0) of the principles, criteria and enabling mechanisms for 'Better Cotton' has been developed on the basis of input and consultations between February 2007 and May 2008 with Regional Working Groups in Brazil, India, Pakistan and West & Central Africa; BCI Advisory Committee members; Better Cotton Partners; Experts; Friends; and publicly through the website.

A key outcome of BCI's Consultation Period in Phase I was, Version 1.0 (draft) of the global production principles, criteria, enabling mechanisms and principles of operation.

<b>Production Principles</b>	<p>Better Cotton is produced by farmers minimise the harmful impact of crop protection practices</p> <p>Better Cotton is produced by farmers who use water efficiently and care for the availability of water</p> <p>Better Cotton is produced by farmers who care for the health of the soil</p> <p>Better Cotton is produced by farmers who conserve natural habitats</p> <p>Better Cotton is produced by farmers who care for and preserve the quality of the fibre</p> <p>BCI promotes Decent Work</p>
<b>Enabling Mechanisms</b>	<p>BCI enables knowledge sharing and skills development</p> <p>BCI enables effective producer organisation</p> <p>BCI enables equitable access to responsible financial services</p>

BCI recognises the unalienable rights and obligations under national legislation and internationally-recognised agreements. BCI has therefore identified principles of operation that serve as a reference point for commitment between all parties working on the implementation of Better Cotton, including but not limited to BCI and entities formally affiliated with BCI, that are as follows:

- All parties comply with national and other applicable law
- All parties are characterised by efficient use of resources, the promotion of good administrative practices and transparency in the management of funds, good governance, and the hindrance of corruption
- All parties ensure non-discrimination in their activities, particularly with regard to gender equality
- All parties value the importance of continuous improvement and learning from doing
- All parties are attentive to reducing emissions that contribute to global warming

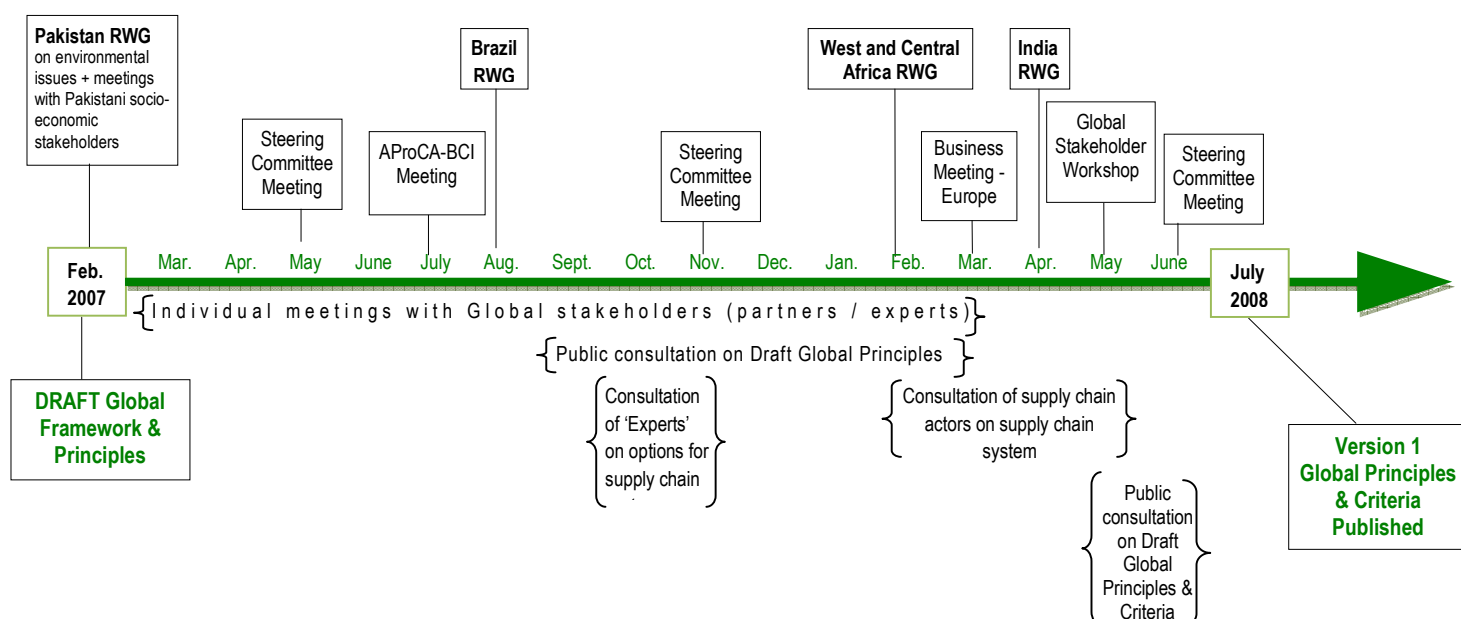
Version 1.0 of the global principles, criteria, and enabling mechanisms will now undergo detailed consideration by Regional Working Groups and Advisory Committee members until early 2009, after which a revision period will take place. In June 2009, Version 2.0 of BCI's global principles, criteria and enabling mechanisms and the wider 'Better Cotton' system will be published. A period of field testing in the 2009 growing season will contribute to a final review of the Better Cotton system, to define a Final (2010) version.

# Consultation Process

Version (1.0) of the principles, criteria and enabling mechanisms (<http://www.bettercotton.org/site.php?9,36>) for 'Better Cotton' has been developed on the basis of input and consultations between February 2007 and May 2008 with Regional Working Groups in Brazil, India, Pakistan and West & Central Africa; BCI Advisory Committee members; Better Cotton Partners; Experts; Friends; and publicly through the website.

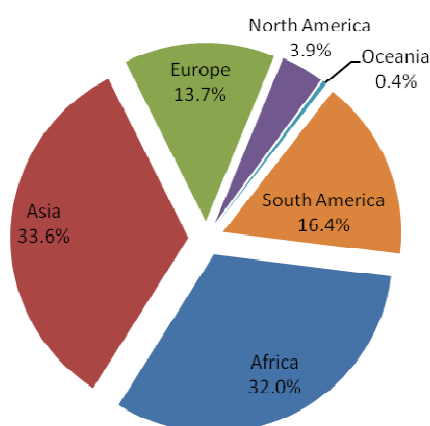
The purpose of the consultation process in Phase I was to cooperatively develop (as far as possible) the global principles and criteria that would define 'Better Cotton', and develop a more grounded understanding of how growing 'Better Cotton' might be realised in the existing different farming contexts of the world.

Consultation was carried out over a period of 16 months, and promoted through face-to-face meetings, multi-stakeholder workshops, regional working group meetings, questionnaires, telephone calls, and emails. The illustrated overview below highlights where consultation was carried out.

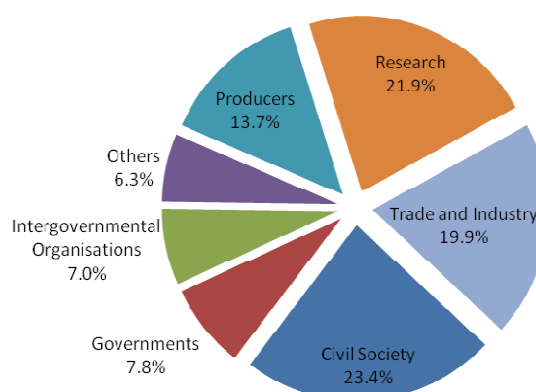


During this consultation period stakeholders from around the world, throughout the supply chain, and across sectors provided constructive input, challenging questions, and supportive ideas. The profile of stakeholders consulted is illustrated below.

## Geographical origin



## Stakeholder Type



Version 1.0 of the global principles, criteria, and enabling mechanisms is open for public consultation for a period of 90 days from 7 July to 1 October 2008.

## Comments and Responses

BCI has received a significant number and wide variety of comments over the 16 month consultation period. This report therefore, does not claim to be fully comprehensive of all the feedback received.

Further details of comments and reports of discussions in Regional Working Group (RWG) meetings during this consultation period are available to download from: <http://www.bettercotton.org/site.php?8,37>

The comments and responses are structured below under the following headings: General, Crop Protection, Water, Soil, Habitats, Fibre Quality, Decent Work, Producer Organisation, Access to Finance, and Knowledge Sharing & Skills Development.

### General

Comments	Responses
It was suggested that more emphasis needs to be placed on increased profitability	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 pilot field projects planned in each region.
Significant comments were made that BCI does not expressly spell out what the benefits of BCI for farmers are.	BCI is now actively developing a clearer expression of the intended benefits for farmers of growing Better Cotton, recognising regional specificities. This will show how implementing the enabling mechanisms and production principles could contribute to: improved profitability; improved health, safety and livelihoods for farming communities; and increased environmental sustainability, safeguarding the ability of future generations to have a healthy farm and to grow and trade cotton.
What are BCI's key objectives for all players – including the industry as a whole?	BCI will define 'objectives' under the BCI mission, clarifying what the overall aims of BCI are. These will not be linked to specific principles or enabling mechanisms as combinations of several may relate to the realisation of a single objective.
BCI should consider how it can recognise and support cotton growers who might be further advanced in the adoption of sustainable practices.	BCI is considering this issue as part of its implementation strategy, and has developed grades of implementation as well as an Endorsement Procedure which should enable all cotton growers to implement BCI and subsequently qualify for 'Better Cotton' after the definition of the principles & criteria have been finalised.
How does BCI define a 'smallholder'? The current definition of smallholders is difficult as many developed country cotton farmers rely on only family labour. It was suggested that a revised definition could be based on family vs. corporate structure	BCI highlights that this distinction is only directly relevant to the application of the Decent Work Principle. In this context, if a large family-run farm does not have a hired workforce, then there is no direct need to comply with additional employment issues specified for large-farm employers. Also, BCI recognises that it needs to define a 'smallholder-employer' and this is now included in the terminology section of Version 1.0 of the principles. It is noted that a distinction based on legal structure is unlikely to resolve the issue, as there can still be large family-owned farms that are structured as private companies.
The BCI approach needs to be more gender-sensitive / needs to 'mainstream' gender	<p>The principles of operation for BCI now spell out more explicitly the gender dimension of non-discrimination, as a value applicable to all parties involved in BCI, written as: <i>All parties ensure non-discrimination in their activities, particularly with regard to gender equality</i></p> <p>The principle of non-discrimination in employment is also a binding commitment for all farmers participating in BCI. Moreover, it should be noted the principles of gender non-discrimination will be key to the successful delivery of the Enabling Mechanisms, and that the operating principles apply equally to implementation strategies.</p>
BCI needs to encompass food security and land rights concerns in its approach	BCI recognises the relevance of land rights and food security as important areas for consideration in developing a 'Better Cotton' system. More time is needed for the Steering Committee to consider these issues and identify the potential role of BCI in addressing them.
How does BCI deliver the Enabling Principles? BCI should not underestimate the scale of resources required to realise the enabling principles.	<p>A needs assessment on the basis of the production principles &amp; criteria and enabling mechanisms will be undertaken, and BCI will then provide and/or coordinate resources, based on this needs assessment.</p> <p>BCI will work in partnership with international, national, and local actors</p>

Are the Enabling Principles an obligation / commitment for BCI to act?	best positioned to promote and realise the production principles and criteria.
There is a need to articulate the influence of climate change, and how BCI will, firstly, include this issue within principles and implementation with respect to climate change adaptation, and secondly, the potential positive contribution of sustainable cotton production in affecting climate change.	While BCI does not include climate change as a specific principle, it is considered that many of the practices and enabling mechanisms being promoted by BCI should provide practical ways for cotton farmers to better manage those impacts of climate change that are not too extreme. For example, a focus on improving water management and soil management will improve a farmer's ability to manage reduced water availability. Also, reduced application frequency of inputs can contribute to lowering carbon emissions.
What are BCI's targets for assessing implementation of the enabling principles?	These will be variable by region, based on an initial needs assessment, and field project timelines.
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 accepted
Questions were raised around BCI's approach to 'verification'.	BCI has begun the development of an 'Assessment Programme' that will define minimum and progress requirements, as well as nationally relevant indicators on process, results and impact. Further discussion with Regional Working Groups to enhance the thinking around an Assessment Programme is planned for Phase II consultations. BCI is conscious of the need to have a process that is scale-able, differentiated to farm size, does not exclude the most vulnerable, and supportive of marketing claims.

## Crop Protection

Comments	Responses
Pakistan and Brazil Regional Working Groups (RWG) noted that the focus of this principle should be Plant Protection, with plant protection being defined broadly  It was also noted that the first version of the principle ('use pesticides safely and responsibly') is similar to the pesticide industry's slogan of 'responsible use', and should perhaps be amended	Reference to the terms 'safe', 'responsible' and 'pesticides' in the principle have been removed, with the term "Crop Protection" incorporated into the principle, i.e. the principle now reads: <i>Better Cotton is produced by farmers who minimise the harmful impact of crop protection practices</i>
Brazil and the West & Central Africa RWG's both noted that the use of non-registered (unauthorised) products should disqualify the user from growing 'Better Cotton'  Similarly the India RWG suggested that "Only legally registered pesticides with Central Insecticide Board (CIB), India need to be applied as per label directions"	The requirement that only legally registered pesticides are used has been included as a criterion.  No reference to national bodies has been included given the need for the criteria to be globally applicable.
West & Central Africa RWG suggested the application and health and safety criteria should be merged under a broad criterion on "precautions during treatment"	The distinction between application issues and health and safety has been maintained.
The India RWG recommended that there be a criterion based on "Pesticides least toxic to non target organisms and less persistent in environment need to be used"	The need to use the least toxic product etc. is included in the list of the issues to be considered in adopting an Integrated Pest Management programme (IPM).
India RWG suggested that restrictions based on WHO class I, Prior Informed Consent (PIC) and national recommendations need to be considered for inclusion as a criterion  West & Central Africa RWG suggested that there should be a criterion based on: "Do not use pesticides listed in Stockholm or Rotterdam conventions"	Restriction based on WHO class I, Stockholm and Rotterdam (PIC) included as a criterion.
West & Central Africa RWG suggested that the use of threshold-based spraying be a mandatory requirement	IPM is a criterion under the crop protection principle, and the need for threshold-based spraying is explicitly noted as one of the components of an IPM programme.

Comments	Responses
<p>West &amp; Central Africa RWG suggested that operations for crop protection must be carried out by trained and knowledgeable adults, and also that measures to prevent re-use of packaging and / or contaminated equipment must be in place to qualify as Better Cotton.</p> <p>Brazil RWG said that use of protective equipment should be essential to qualify as Better Cotton.</p> <p>West &amp; Central Africa RWG suggested that no children be involved in spraying; spraying only by trained and knowledgeable adults, use of appropriate Personal Protective Equipment (PPE), proper storage by both farmer and seller of pesticides, disposal of obsolete pesticides, implementation of measures to prevent (re)-use of contaminated equipment or containers; do not plant too close to communities / villages etc</p>	<p>These requirements have generally been incorporated into the criteria relating to the proper handling and application of pesticides</p>
<p>It was suggested that the principle should include reference to IPM</p>	<p>IPM is the first criterion, and an essential component of crop protection</p>
<p>It was suggested that the principle be phrased: "Better Cotton is produced by farmers who safely use pesticides and minimize their non-target impact" as here worker safety is the paramount importance along with avoiding impact of pesticides on wildlife and other crops</p>	<p>Concept of minimising harmful impact now noted in the crop protection principle; worker safety issue is captured in this broad wording of the principle, and is also dealt with explicitly in the criterion on health &amp; safety.</p>
<p>A number of claims were made in support of endosulfan, including: it is an important rotation product to manage insect resistance (has a unique mode of action and low levels of resistance); it is widely used; inexpensive; safe to use with low environmental residues; an important component of IPM, given its relative softness of beneficial insects (especially bees), and broad spectrum of pest-activity; it is compatible with many bio-pesticides.</p> <p>The need to consult more widely with farmers who use endosulfan – especially those without access to email and the internet — was noted</p>	<p>BCI considers that it is in the interest of both the health of the farmer/farming community, and of the environment for there to be a reduction in the total toxicity of the pesticides applied to the crop.</p> <p>One method for reducing the total toxicity is to restrict access to certain types of pesticides, based on their toxicity (for example, by WHO classification, or environmental risk categorisation). As FAO notes, restricting access to certain toxic pesticides, such as WHO Class I "may be desirable if other control measures or good marketing practices are insufficient to ensure that the product can be handled with acceptable risk to the user."</p> <p>However, BCI recognises that a blanket restriction on the use of a range of pesticides may not be able to take into account either:</p> <ul style="list-style-type: none"> <li>– The specific and immediate regional impacts of such a restriction, such as are viable alternatives available?</li> <li>– The degree of risk associated with using the pesticide in different regional contexts, i.e. regions with access to different technologies will have differing abilities to minimise the risks associated with applying pesticides. Again, as noted by FAO: "Pesticides whose handling and application require the use of personal protective equipment that is uncomfortable, expensive or not readily available should be avoided, especially in the case of small-scale users in tropical climates".</li> </ul> <p>BCI will therefore develop phasing out timelines through discussion at a regional level, and base them on factors including the availability of alternative control methods, the degree of risk posed by the particular pesticide in the region, and the ability for that risk to be properly managed.</p> <p>Therefore the criterion is as follows:</p> <p><i>Use of the following pesticides: those categorised as World Health Organisation 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</i></p>
<p>It was pointed out that there seemed to be a conflict between BCI's position of recognising national regulation ('inalienable rights and responsibilities under national law'), while proposing unilateral prohibition of a legally registered input</p>	<p>This reference to national law is based on respecting the minimum standard applicable under that legislation, ie. BCI will not define 'Better Cotton' so as to include a requirement that falls <b>below</b> what is expected under national law. As BCI is a voluntary approach to reducing the impacts of cotton farming, it is considered that setting a 'higher' standard is an acceptable approach.</p>



Comments	Responses
It was noted that a blanket restriction was not able to distinguish and take into account differing abilities/access to technologies between countries with respect to the ability of farmers to manage pesticides well	BCI will develop a better understanding of the specific impacts of any restriction, including the availability of alternatives and the means to manage pesticides, on a regional level.
It was noted that reference to 'impact' is ambiguous (ie optimising use = optimising impact) – impacts can be positive and negative, would it be better to refer to toxicity?	Wording of principle has been revised to refer to negative impact to make it explicit that minimising <b>negative</b> impact is the focus of the principle  Also, it is anticipated that reduction in toxicity will be an important indicator for assessing progress towards minimising impact
It was commented that pesticides should not be applied by women of "child-bearing age".	Extension to women of child-bearing age was not incorporated. It was considered that this may risk excluding women farmers from participating in a BCI programme in the absence of feasible alternatives to manual preparation and application of pesticides. It was recognised in particular that the task of input preparation is almost exclusively feminised in the Indian context. The criterion in version 1.0 is therefore: <i>Pesticides are prepared and 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.</i>
It was suggested that the reference to health & safety should be not only to application of pesticides but also to preparation.	Criterion revised to refer to both preparation and application.
It was suggested that the definition of 'pesticides' should be made broader	The principle now refers to crop protection, and a broad definition of pesticide is provided in the footnotes.
What is "safe" disposal of pesticide containers?	The best practice (i.e. what is safe) needs to be determined at a national level – based on a combination of best practices, national legislation, and the local context.  Explanatory noted under criterion has been amended to note: "The focus is to prevent pesticide containers ever being used, either accidentally or intentionally, for household purposes".
It was suggested that a more explicit reference be made to insecticide resistance management within the framework of IPM, so as to 'not repeat the mistakes of the past' with respect to the development of insect resistance	The notes in the IPM criterion have been revised so that an IPM programme needs to include a formal Insecticide Resistance Management Plan.

## Water

Comments	Responses
The Brazil RWG suggested that the principle should be "Better Cotton uses water from sustainable sources"	Sustainability concept captured by criterion that covers the need for extraction to be both legal and to have no adverse impact
The India RWG suggested that the principle should be "Better Cotton is produced by farmers who care for efficient use of water"	The concept of efficiency can be spelled out in more detail with national guidance materials, as what is efficient use will be affected by whether the system is rain-fed or irrigated (see below also)
The India RWG suggested a new criterion based on Water Conservation: "Efficient conservation of rain water"	As principles and criteria need to cover both rain-fed and irrigated farming systems, a criterion focussed on only one cannot be included at this level; the issue will be considered by having practices for conserving rainwater included in the national guidance materials
It was suggested that quantifying water use efficiency should refer to 'more cotton per drop'	Yield per unit of water is not necessarily a clear measure, as water availability is one of several contributory factors to yield. Nonetheless, 'more cotton per drop' can figure as an indicator of improvement / change over time. Use of an indicator based on 'crop per drop' is also better developed as a regional indicator – given regional differences – rather than being included at the global level of the definition of 'Better Cotton'
It was suggested that the water principle needs to include quality issues	Quality concerns (re farm water run-off) has been incorporated into Habitat Principle
It was suggested that BCI should add an additional criterion: "cotton cultivation practices minimise other impacts on other water users"	Water Principle relates only to water as an input. BCI deals with farm run-off (and the potential negative impact on other users) under the Habitat Principle; also, the requirement to manage erosion will also help to minimise the impact on other water users. To clarify the criterion relating to extraction not having adverse impacts, the reference to 'used for irrigation' has been removed so as to make it clear that all water bodies (and not just those used for irrigation) are included.



Comments	Responses
It was suggested that there be an additional criterion: water use practices minimise water quality degradation in terms of addition of salinity or other chemical pollutants	The issue of other chemical pollutants and farm run-off are dealt with under Habitat Principle, and issue of salinity management is now be noted as being potentially relevant in the explanatory notes in both the water and soil principles.
It was commented that “the Water Principle seems quite light”	<p>The general BCI approach is to deal with key issues at the global level and to capture detail at the regional level. While BCI could add salinity management as a criterion under water management (for example), this is quite a localised issue. Also, given diversity in production systems – both irrigated and rain-fed – this heading has deliberately been kept broad so as to be able to include a diverse range of rain-fed and irrigation farming systems.</p> <p>The national guidance material and indicators will contain greater detail and will be based on the types of irrigation / farming system present in the region. The distinction between dryland (rain-fed) and irrigation, or the various types of irrigation systems cannot be properly nor neatly and succinctly summarised in their entirety at a global level.</p>
Inclusion of water policy and tariffs?	BCI considers that this currently lies outside the focus for BCI activities; although any barriers to sustainable water use relating to policies/pricing that are identified through needs assessments can be shared with the appropriate organisations.

## Soil

Comments	Responses
Brazil RWG suggested that the soil health principle should include an element of improving the health of the soil, or at least protecting and maintaining its characteristics	A criterion has been included that addresses this issue specifically: soil management practices are used that maintain and enhance the structure and fertility of the soil
India RWG suggested a criterion “Efficient integrated nutrient management: Nutrient (organic and inorganic) use based on needs of crop and availability of resources in soil”	It is considered that these concepts (crop need and soil resource availability) are already captured; national guidance material in India can include more explicit reference to organic sources of nutrients
India RWG suggested a new criterion: Cropping system management: Crop rotation/ intercrop (cotton based) and sequence crops are used	Can be included as a tool / best management practice for managing soil fertility and structure at the regional level, rather than as a global criterion
India RWG suggested a new criterion: Soil Pollution: Protecting soils from excessive use of fertilisers and agro chemicals	Not included; concepts are incorporated into requirements to base nutrient use on needs of the plant and soil, and the need to maintain and enhance soil structure and fertility
It was suggested to broaden the statement on nutrients: “Nutrients include organic fertilizers, mineral fertilizers and synthetic fertilizers”	Agreed to expand definition of types of nutrients
It was suggested that a new criterion: “do not deteriorate the fertility of the soil” be added	Not accepted, will keep “maintain and enhance” as the suggestion does not take into account soils in an already deteriorated condition which should be improved
It was suggested that a new criterion: “use cropping systems that require minimum external inputs” be added	Not accepted: current criterion requires that nutrients are applied on basis of crop and soil needs, while reference is made to the use of cover and rotation crops as part of the criterion to maintain and enhance the fertility of the soil. Hence proposed additional criterion is redundant.
It was suggested that there should be a separate principle and criteria for ‘chemical’ fertilizers and nutrients to ensure ‘stringent control in the use of fertilizer chemicals’	Not deemed necessary and would make the principles ‘unbalanced’ in that there would be two principles focussed on intimately related issues. In any event, all nutrients are required to be applied on basis of crop and soil needs, and issues of timing, placement and quantity applied – for all nutrient types — are dealt with under the current criteria.
It was suggested that there should be a greater focus on on-farm waste management, green manuring, cover crops etc.	These issues can be included in greater detail in national better practices for maintaining and enhancing the structure and fertility of the soil
It was suggested that BCI should remove the OSH criterion on application of chemical nutrients	Agreed – no evidence to date that it is a priority health & safety issue.

## Habitats

Comments	Responses
Both the West & Central Africa and the Brazil RWG's noted the importance of the extant regulatory framework of this issue	Criterion drafted accordingly as: <i>The use and conversion of land to grow cotton conforms with national legislation related to agricultural land use</i>
India RWG suggested that the concept of protecting water courses and other bodies from farm run-off be removed from water principle and included under the habitat protection principle	Suggestion accepted, and issue now incorporated under habitat principle
India RWG suggested a new criterion: "Farm runoff: Reducing the loads of chemicals/ fertilisers in runoff water"	This issue is already considered by existing criteria, ie. it will be managed by i) good erosion control practices, ii) good nutrition management practices (applying nutrients per crop and soil needs should minimise risk of excessive nutrient application and therefore loss), and iii) the need to protect off-farm biodiversity and water courses etc.
India RWG suggested a new criterion: "Bio diversity: Natural parasite predator relationships maintained"	Enhancement of biodiversity issues already included in the criterion; parasite / predator ratio may be a suitable indicator (ie a regional level issue), depending on whether it can be feasibly monitored
It was suggested to broaden the biodiversity statement to include crop biodiversity – "Crop diversity on the farm and biodiversity surrounding the farm is enhanced".	The notion of crop diversity as part of on-farm biodiversity; has been included in the guidance notes.
It was stated that there are many aspects of natural habitat protection which lie outside the influence of farmers, and "that it presupposes that farmers can and are willing to protect drinking water sources and other bodies of water from farm run-off. This is often almost impractical in even the most developed countries"	BCI believes that there are several aspects – and practices – relating to the protection of natural habitat which do come under the control of the farmer and which might feasibly be implemented: eg planting of vegetative buffer strips, use of structural water diversion devices, deciding where to plant crop, furrow direction etc.
It was suggested that there is a need to introduce the notion of ecosystem services / riparian strips	BCI understands "eco-system services" to relate to systems that are developed to reward farmers for the environmental benefits provided by their farm. At this stage, given the early stages in the development of the concept, and the need for better understanding of both the types of services that might be rewarded, and how they would be rewarded, it is difficult to see how it can be explicitly included in the definition of Better Cotton. Nonetheless, one issue that BCI will look at closely in the project phase is the potential for making collective connections (ie. groups of farmers collaborating) to protect ecosystems. National guidance material could incorporate reference to working through producer organisation to explore potential for ecosystem services.  Riparian strips will be included as a potential best management practice to help meet various criteria. BCI recognises that riparian strips are important biodiversity zones, and where cotton farms include riparian zones, their protection will be an important consideration.
It was suggested that there should be an additional criterion that "farms must be on land which has not been converted from natural habitat in at least five years or since 2008"	Criterion not included in version 1.0; further work on identifying global definitions for 'protected areas', and / or 'High Conservation Areas' will be undertaken to ascertain whether such an additional criterion would be a meaningful addition to the existing criterion on the need to abide by national law with respect to protected areas, land clearing etc.

## Fibre Quality

Comments	Responses
Brazil RWG suggested that the agronomic-focussed criterion be split into two separate criteria relating to planning and crop management	Split not made as the planning generally relates to the issues considered in the agronomic criterion
Pakistan RWG suggested an additional criteria based on the need for a fair and equitable marketing system  Similarly, the lack of a standardised grading system was noted as an impediment to West & Central African cotton realising full value for quality.	While the importance of the issue of how cotton is graded and marketed is noted and accepted, it is outside the farm-focussed scope of BCI. Nevertheless, opportunities may exist to explore 'better' marketing systems during the pilot phase of BCI. For example, through producer organisation, farmers should be better positioned to negotiate rates which better recognise quality and thus enable farmers to better capture this value.
Brazil RWG suggested a new criterion focussed on ginning	Ginning generally not under a farmer's direct control so will not be included as a production principle; where it is (eg. Brazil), BCI will investigate whether and how ginning might be attended to through the supply chain system

Comments	Responses
<p>West &amp; Central Africa RWG suggested that there should be additional criteria for ginning, and storage and transport of lint (baled) cotton.</p> <p>India RWG suggested these issues not captured by existing criteria and should be included:</p> <ul style="list-style-type: none"> <li>– Harvesting/Handling</li> <li>– Storage</li> <li>– Transport</li> <li>– Ginning and pressing</li> </ul>	<p>As above; nevertheless BCI will need to work with gins, and the opportunity to further to discuss these issues will be taken as part of that collaboration.</p> <p>Noted that harvesting and handling – where controlled by the farmer — are included in the definition of Better Cotton, ie. where transport of seed cotton to the gin / market is under the control of the farmer then the relevant good management practices will be applicable</p>
It was suggested that weather should be added as a factor that affects fibre quality	Accepted and included.
It was suggested that the reference to “highest possible quality of fibres” should be removed	BCI acknowledges that there is a variety of cotton qualities sought by the market: therefore, amendment to refer to “best” quality has been made
It was suggested that a criterion on seed quality should be included	BCI recognises that this is an important issue, and it is highlighted as one of the issues for consideration under the criterion focussed on adoption of practices that maximise fibre quality. It is not considered however that it should be a stand-alone criterion.
It was suggested that the criterion referencing damage should make explicit reference to avoiding fire accidents	Not included, as it is considered that the term damage — as is already included in the criterion — incorporates fire damage; minimising the specific risk of fire can be incorporated through nationally relevant management practices
It was suggested that BCI should facilitate access to fibre-quality testing and arbitration procedures	Whilst an important issue, this does not fall within the farm-level scope of BCI.
It was commented that the materials produced to date “understate the importance of tackling contamination”	BCI considers that the inclusion of fibre quality in the definition of Better Cotton as a stand-alone principle is the critical starting point for ensuring that the issue of contamination is addressed. Contamination is explicitly referenced in one of the criteria under the fibre quality principle, and implementing methods for reducing contamination — ideally in collaboration with ginners — will be an important component of the implementation of a Better Cotton System.

## Decent Work

Comments	Responses
The term ‘opportunity’ – in ‘Producing Better Cotton is an opportunity for Decent Work – is not really accepted. Preferred alternatives are that ‘BCI promotes Decent Work’ or that ‘Better Cotton is produced by farmers that respect the principles of Decent Work’.	The basis for the move away from ‘BCI promotes’ is that this formulation puts the full onus on BCI to promote labour standards, and implies that farmers does not have a role. However, it is accepted that this formulation is clearer. There may also be a challenge in referring to ‘Decent Work principles’ as a normative concept because the ILO concept of Decent Work is not exclusively standards-based – it also relates to job creation, social protection and social dialogue. The Steering Committee has agreed a revision of the Principle to: <i>BCI promotes Decent Work</i>
How feasible is the Decent Work Principle in the smallholder, given smallholders’ reliance on paying low wages, and the fact that a ‘standard’ may increase costs	It is recognised that there are two important but very different perspectives on the labour rights component of Better Cotton. The first, alluded to in the first comment, recognises that imposing impracticable codes on smallholders may simply serve to threaten their market position and economic viability. The second, equally voiced during consultation, 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 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
The Decent Work Principle needs a re-think, as it is currently based too closely on a formal economy / trade union approach.	

Comments	Responses
Applying Decent Work criteria will make it impossible to grow cotton profitable in West Africa, where cost competitiveness is largely derived from minimal labour costs.	employment situations (smallholder-employers and larger farms) – ie not to family-based smallholdings. BCI recognises that labour ‘cash standards’ (which have an impact on legitimate labour costs) are to be established at national-level rather than global – for this reason, reference is to relevant local rate, which is set by national structures in light of development situation of country. A key issue is therefore the implementation of the additional criteria for smallholder-employers. BCI recognises that it must provide a clear definition of smallholder-employers. BCI will adopt a differentiated approach, depending on how structurally dependent a smallholder farmer is on employees.
Is there any scope to include learning from the Ethical Trading Initiative’s (ETI) work on smallholders?	An understanding and appreciation of the ETI Smallholder Guidelines has been taken into account when drafting these criteria. The ETI base code covers all the provisions listed in the draft additional criteria for employers – the distinction comes into the way in which these ‘consensus’ labour codes are implemented (eg on the basis of needs assessment and capacity-building, rather than by unsupported ‘auditing’).
The provision on non-discrimination requires more detail, namely spelling out the grounds for non-discrimination.	BCI has given this issue careful consideration and has chosen not to list grounds for potential discrimination, on the basis that the principle of non-discrimination in employment – getting the best person for the job, regardless of extraneous factors – is the key. Moreover, establishing a list implies that this list is comprehensive: this would then entail a potentially long – and contentious – list (eg ILO conventions do not refer to age or sexual orientation).
There are a number of feasibility challenges associated with the ‘additional criteria for’ smallholder-employers’	BCI recognises that this is a challenging issue, and is to some degree dependent on the definition of ‘smallholder-employers’. While it is recognised that smallholder-employers may themselves find it very hard to afford changes in employment practice, it is equally acknowledged that those workers employed by smallholders are likely to be even more vulnerable. In essence, BCI notes, the additional criteria applicable to smallholder-employers focus on aspects of national employment legislation which are already binding on employment relationships.
The general provision on Freedom of Association needs to refer also to workers association	The rights of worker organisations are covered under additional criteria for small holder / large holder employers, and this will be cross-referenced in the general provision. The reason not to make express reference to worker organisation in the general provision is that this is intended to apply to all farming context, including family employment. For this reason, worker organisation is referred to under the criteria for a non-family employment situation.
There should be reference not only to the capacity building of Producer Organisations, but also of Workers’ Organisations	BCI recognises that the ability of workers to access their rights is fundamentally linked to their ability to organise. However, given that non-family employment is only prevalent in only certain regions, this remains a regional issue, to be determined by a regional needs assessment.
Why is the minimum age for employment set at 15, not 14 as is stipulated for developing countries in the ILO convention 138?	In seeking to maintain consistency with other similar standards, BCI took as its initial point of reference for this provision the standards established by FLO and SASA, all of which refer to a minimum age of 15, or school-leaving age, for contracted employment. BCI recognises, however, that the relevant ILO convention (C138) provides for a lower age for employment of 14 where the development situation of the country justifies this; more C 138 does not apply to family smallholdings where production is for local consumption. However, to recognise the specificity of developing country production systems - which are exclusively dominated by family smallholdings - BCI has chosen instead to make specific dispensations for children’s work in developing countries on the basis of the family-based nature of the work – hence (light) work in family smallholdings is covered in the subsequent clause. BCI considers that this approach is consistent with the letter and the spirit of the ILO convention.
Why not refer to ILO conventions on child labour?	BCI concurs that it would be a clear and useful approach to refer to both ILO conventions 138 and 182, and/or the UN Declaration on the Rights of the Child. The Steering Committee has agreed that the first criterion on child labour should read: “there is no child labour, as defined in ILO Convention 138”.
Why not use the word ‘hazardous’ in the context of child labour, which is the normal term?	BCI agrees that ‘hazardous’ work fully covers the category of activities which are unsuitable for under-18s. The text was an attempt to explain what hazardous work means. The criterion has been revised to refer simply to ‘hazardous’ work.

Comments	Responses
The requirement on employers to provide regular health & safety training should apply to smallholder-employers as well as large-farm employers.	While BCI has attempted to maintain smallholder-employer requirements to a minimum, it is recognised that OSH training will be a core part of any training that will need to be implemented – and is also covered in the Crop Protection principle. Therefore, BCI agrees that this provision should be included as part of the criteria applicable to smallholder-employers, and the criterion has been revised accordingly.
What is meant by ‘working conditions’ in the additional criterion for smallholder and large-farm employers: ‘Workers’ consent is obtained as regards all working conditions’?	BCI wishes to clarify that this does relate to core aspects of the employment relationship – pay, hours – but also suggests that this should also encompass a broad range of other issues. Given the regional variation and different work activities (harvest, weeding, spraying etc.), it is suggested that guidance material will be developed regionally as to what should be included, with primary reference to national regulation.
The last criteria listed under ‘Employment Conditions’ should also be applicable to smallholder-employers (equal conditions, working hours and overtime)	BCI recognises the primary role of national legislation in determining substantive conditions of employment outside those areas defined by international labour standards (freedom of association, non-discrimination, forced labour, child labour) and states that all employers must respect national labour law. However, BCI equally understands from its engagement with producers in pilot regions the need for a pragmatic approach to implementation. BCI recognises that efforts to achieve progress in these areas will take place over time, in order to ensure that smallholders are not disadvantaged vis-a-vis larger producers in the first stages of BCI implementation.
The criterion on overtime should refer to ‘appropriate remuneration’ for overtime.	BCI considers that this revision would be redundant, given the previously stated requirement to abide by national law.
How can BCI better communicate the concept of the distinctions made between small and large farmers in the Decent Work principle?	BCI will seek to clarify the introductory paragraph, in particularly adding an express definition of what constitutes a ‘smallholder-employer’. BCI will also clarify that there are additional details for the Decent Work criteria as they apply to smallholder-employers and large-farm employers.
Instead of stating that “Better Cotton is”, the criteria should say “must”, and make other binding recommendations to farmers	BCI’s preferred approach is to describe the situation which characterises Better Cotton: i.e. “Better Cotton is”
The ‘Decent Work’ concept does not yet have currency in all languages in pilot regions	BCI agrees that this concept may be better translated in Portuguese as ‘relações justas do trabalho.’

## Producer Organisation

Comments	Responses
How will BCI get those producers that are not organised involved? If BCI only works with those already organised then this risks excluding some of the most vulnerable.	The fundamental issue here is that producer organisation is <i>not</i> a pre-condition for participation in BCI; rather it is one of the key means by which ‘Better Cotton’ can be promoted and realised. To clarify this confusion, the Enabling Principles are renamed as Mechanisms, describing the way in which BCI intends to work with (smallholder) farmers.
It is worth considering an area approach to producer organisation?	BCI is considering taking an approach to farmer groupings around a gin catchment area, and notes that in the current pilot regions the level of producer organisation is significantly varied. For example, in the case of Pakistan or India the establishment of producer groups is a necessary first step to realise the production principles. This will apply similarly in other countries / regions during expansion.
What model of producer organisation is considered effective?	The essence of effective producer organisation is listed under the mechanism, and was closely informed by regional stakeholder engagement. However the model will need to be differentiated depending on the country / region. It is noted that Producer Organisation was considered to be key by all BCI’s stakeholders in pilot regions. Working groups in West and Central Africa and in India proposed that producer organisation eligibility criteria are legitimate (but should not be a pre-condition to beginning participation in BCI).
With regard to building capacity of producer organisations, it is preferable to espouse more modest aims over a longer period of support, than to aim to achieve more ambitious goals over a short period of time, as the latter risks leaving a weak and unsustainable legacy.	The Steering Committee is mindful of the sustainable impact of any capacity building activities, and on this basis is considering a longer project cycle into its planning and development activities for pilot projects.
What is the scale of commitment for BCI in “enabling” producer organisation – is this a commitment to fund capacity building?	As with other enabling mechanisms, Producer Organisation is one way in which ‘Better Cotton’ can be realised, as well as being a valuable outcome in and of itself. BCI’s understands that much work is already in train: BCI should not duplicate or act in parallel. The BCI rationale is to seek to harness and coordinate resources on the basis of needs assessment. The form of activity which may be derived from this initial assessment may include: supporting the development of structures / forms of organisation; supporting the development of organisations’ capacity to negotiate, lobby and advocate interests; training technical teams within organisations; supporting research / circulation of relevant information within an organisation.



## Access to Finance

Comments	Responses
(With regard to original draft of Principle – ‘BCI will facilitate access to equitable finance’): Principle should be re-drafted as ‘BCI facilitates equity in access to financial services’ – defined as “putting in place of financial products which meet the real and expressed needs of cotton-producing communities” – an active commitment	On the basis of input from regional working groups, BCI re-formulated the Principle on Access to Finance for the purposes of public consultation. Accordingly, the Principle (now mechanism) reads: ‘BCI enables equitable access to responsible financial services’, where such services are characterised as fair (the terms of lending do not increase the financial precariousness of the borrower, and are not discriminatory); transparent (both parties agree and commit to the terms of lending); and institutional (lending is undertaken by a financial institution abiding by responsible lending principles).
(With regard to original draft of Principle – ‘BCI will facilitate access to equitable finance’): Principle should specify what equity means: namely, “Better Cotton initiative will facilitate access to equitable (fair, institutional and transparent) finance”.	
The text totally excludes microcredit schemes.	The term ‘institutional’ within the mechanism absolutely does not preclude microfinance institutions (MFIs). BCI understands that micro-finance represents an important opportunity for many cotton farmers, and that there have already been positive results from relations between MFIs and producer communities.
Ginnners will play a critical role in financing mechanisms, especially in African farming systems.	BCI recognises that gins / ginnners are a key stakeholder and implementing partner; and work to develop relationships with ginnners will begin in Phase II of the consultation process. African cotton companies commonly have agreements with agricultural banks/MFIs to pre-finance inputs on their behalf – therefore potentially limited scope for intervention without the participation of cotton companies. It is also understood that, whereas the availability of credit is directly linked to the growing of cotton, financing needs are broader – eg family needs, food security. Moreover, there are some producer constituencies – particularly women – who are creditworthy but lack any access to finance.
‘Access to finance’ <i>per se</i> fails to express the specific problems associated with financial aspects of cotton cultivation in West & Central Africa. ‘Inequitable’ factors in current situation are not so much the terms of credit, but cost of inputs themselves (which are valued in €, while cotton is valued in \$).	BCI further recognises that finance issues differ between regions – with perhaps the greatest challenge in South Asia, where the role of informal lending / ‘dealer’ middlemen is a key downward pressure. (Indian stakeholders proposed the following characteristics of “equitable finance”: interest rate for short-/medium-term credit should be lower than consumer credit at accessible rate; interest rate for institutional credit / long term credit should be lower than the rate for individual credit.) In West & Central Africa the ‘cotton infrastructure’ pre-finance inputs and in Brazil state runs schemes for family farmers, but these are not crop-specific.

## Knowledge Sharing and Skills Development

After consultation with Regional Working Groups between February 2007 and April 2008 it was clear that an additional activity alongside work on producer organisation and access to finance was implicitly understood to be carried out. It was therefore made explicit as an additional (enabling) principle as part of Version 0.5 of the principles and criteria; now an enabling mechanism in Version 1.0

Comments	Responses
Suggested rewording of principle: BCI promotes capacity building and development of human resources (notably knowledge sharing and skills development).	It is considered better to maintain brevity within mechanism itself and then clarify within notes and guidance. The spirit and sense of revision is acknowledged as relevant.
A good approach to this is peer to peer learning rather than technical assistance	BCI accepts this as a good approach and it will reflect this in the development of Implementation Strategies.
How will BCI address research deficiencies for cotton varieties and cotton production in general?	This is considered beyond BCI’s scope and expertise. BCI considers research to be a nationally specific institutional activity who have the expertise and knowledge – by enabling producer organisation BCI seeks to give producers greater ability to influence research to support yield increases and increased farmer incomes.



## Next Steps

Version 1.0 of the global principles, criteria, and enabling mechanisms is open for public consultation for a period of 90 days from 7 July to 1 October 2008. Detailed consideration by Regional Working Groups and Advisory Committee members will continue until early 2009, after which a revision period will take place.

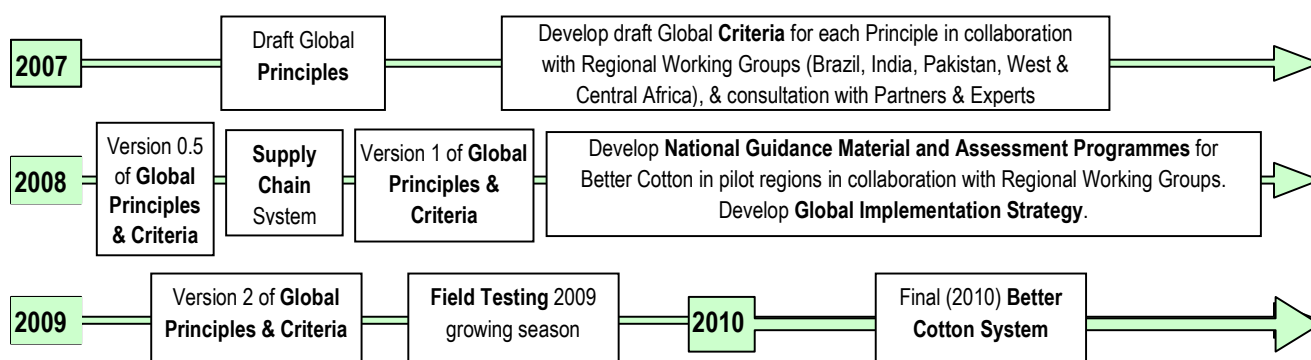
In June 2009, Version 2.0 of BCI's global principles, criteria and enabling mechanisms and the wider 'Better Cotton' system will be published. A period of field testing in the 2009 growing season will contribute to a final review of the Better Cotton system, to define a Final (2010) version.

In developing a wider 'Better Cotton' system for field testing BCI will work to develop the following system components:

- National Guidance Material and National Indicators in the pilot countries
- Appropriate implementation strategies in pilot countries/regions
- Assessment Programme
- Supply chain system
- Global implementation programmes that support national implementation strategies

BCI will ensure that opportunities to comment and enhance these streams of work are provided over the next year; key to developing these streams of work is the consultation with Regional Working Groups through in-location meetings in Brazil, India, Pakistan, and West & Central Africa.

BCI's long-term consultation process is represented in the illustration below:



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