



# **BETTER COTTON NORMATIVE REQUIREMENTS**

## **Principles, Criteria & Indicators**

### **Large Farms**

**VERSION 2.0**

1 March 2018

## Table of contents

Introduction

Principle 1: BCI Farmers minimise the harmful impact of crop protection practices

Principle 2: BCI Farmers promote water stewardship

Principle 3: BCI Farmers care for the health of soil

Principle 4: BCI Farmers enhance biodiversity and use land responsibly

Principle 5: BCI Farmers care for and preserve fibre quality

Principle 6: BCI Farmers promote decent work

Principle 7: BCI Farmers operate an effective management system

## Introduction

The Better Cotton Principles and Criteria (P&C) are a critical component of the BCSS. This practice-based standard forms the global definition of Better Cotton. By adhering to these principles, BCI Farmers produce cotton in a way that is measurably better for the environment and farming communities. The P&C provides rules and guidance to farmers participating in BCI programmes on how to reach BCI social and environmental sustainability objectives.

The P&C cover the most significant global issues associated with cotton cultivation and explain the intended outcomes achieved through their adoption. The P&C can be applied at a global level.

They generally apply to farming areas used for the purpose of producing Better Cotton within the geographic boundaries under the farmer's responsibility. This means all areas within or adjacent to BCI Farmers' cotton fields. However, areas that are not used for cotton production are not subject to the P&C, unless they are covered by management plan requirements.

BCI distinguishes between three categories of farmers (smallholders, medium farms and large farms) in recognition of the differences in production methods and workforces they use.

This document covers all principles, criteria and indicators applicable to large farms. Separate companion documents covering the principles, criteria and indicators applicable to smallholders and medium farms are also available.

## PRINCIPLE 1 – BCI Farmers Minimise The Harmful Impact Of Crop Protection Practices

### CRITERION 1.1

The Producer must adopt an Integrated Pest Management Programme that includes all of the following principles:

- i. growing a healthy crop;
- ii. preventing the build-up of pest populations and the spread of disease;
- iii. preserving and enhancing populations of beneficial organisms;
- iv. regular field observations of crop health and key pest and beneficial insects;
- v. managing resistance.

### Core Indicators

**1.1.2** An Integrated Pest Management Programme is implemented that includes all the following components:

- i. growing a healthy crop;
- ii. preventing the build-up of pest populations and the spread of disease;
- iii. preserving and enhancing populations of beneficial organisms;
- iv. regular field observations of crop health and key pest and beneficial insects;
- v. managing resistance.

**1.1.4** There is no calendar or random spraying.

### CRITERION 1.2

The Producer must only use pesticides that are:

- i. Registered nationally for the crop being treated;
- ii. Correctly labelled in at least one *de facto* or *de jure* official national or applicable official regional language.

### Core Indicators

**1.2.1** All pesticides used are registered nationally for use on cotton.

**1.2.2** All pesticides used are correctly labelled in at least one *de facto* or *de jure* official national or applicable official regional language.

## Improvement Indicator

- 1.2.3** All natural substances used are registered under the local/national BCI natural substance database.

### CRITERION 1.3

The Producer must not use any pesticide listed in:

- i. Annex A and B of the Stockholm Convention; or
- ii. Annexes of the Montreal Protocol; or
- iii. Annex III of the Rotterdam Convention.

## Core Indicator

- 1.3.1** Pesticides listed in:
- i. Annex A and B of the Stockholm Convention; or
  - ii. Annexes of the Montreal Protocol; or
  - iii. Annex III of the Rotterdam Convention; are not used.

### CRITERION 1.4

The Producer must phase out the use of any pesticide active ingredients and formulations that are known or presumed to be extremely or highly hazardous (acute toxicity).

## Core Indicators

- 1.4.1** The Producer has a plan to phase out by 2021 pesticides listed in category 1 of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS); Ia of the World Health Organization (WHO) classification.
- 1.4.2** The Producer has a plan to phase out by 2024 pesticides listed in category 2 of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS); Ib of the World Health Organization (WHO) classification.

## Improvement Indicators

- 1.4.5** The Producer has phased out Globally Harmonized System (GHS) category 1 / World Health Organisation (WHO) Class Ia.
- 1.4.6** The Producer has phased out Globally Harmonized System (GHS) category 2 / World Health Organisation (WHO) Class Ib.

## CRITERION 1.5

The Producer must phase out the use of any pesticide active ingredients and formulations that are known or presumed to be carcinogenic, mutagenic or reprotoxic (CMR) substances.

### Core Indicator

- 1.5.1** The Producer has a plan to phase out Pesticides defined as carcinogenic, mutagenic or reprotoxic (CMR) substances according to Categories Ia and Ib of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) and Ia and Ib of the World Health Organization (WHO) classification.

### Improvement Indicator

- 1.5.3** The producer has phased out pesticides defined as carcinogenic, mutagenic or reprotoxic (CMR) substances according to Categories Ia and Ib of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

## CRITERION 1.6

The Producer must ensure that any person who prepares and applies pesticides is:

- i. Healthy;
- ii. Skilled and trained in the application of pesticides;
- iii. 18 or older;
- iv. not pregnant or nursing.

### Core Indicator

- 1.6.1** The Producer must ensure that any person who prepares and applies pesticides is:
- i. Healthy;
  - ii. Skilled and trained in the application of pesticides;
  - iii. 18 or older;
  - iv. not pregnant or nursing.

## CRITERION 1.7

Producers must ensure that any person who prepares and applies pesticides always uses appropriate protective and safety equipment in a correct manner.

### Core Indicators

- 1.7.1** Pesticides are prepared and applied by persons who correctly use appropriate protective and safety equipment.

- 1.7.3** Pesticide labels are checked regularly (at least every spray season) to ensure that the appropriate Personal Protective Equipment is available for the pesticides being used.
- 1.7.4** Training on safe work procedures and the maintenance, use and proper storage of Personal Protective Equipment has been delivered to all staff who work with pesticides.

### Improvement Indicators

- 1.7.6** Frequency at which Personal Protective Equipment is checked for wear and tear, and replaced if required.
- 1.7.7** Frequency at which refresher training on safe work procedures and the maintenance, use and proper storage of Personal Protective Equipment is provided.

## CRITERION 1.8

**Producers must store, handle and clean pesticide application equipment and containers, in order to avoid environmental harm and human exposure.**

### Core Indicator

- 1.8.1** Dedicated areas must be available on the farm for storing, mixing and handling pesticides, and for cleaning pesticide containers and application equipment. The areas must fully comply with relevant legislation for the storage, handling and disposal of pesticides. Within these areas, all rinsate and runoff must be completely captured so that it poses no contamination risk.

## CRITERION 1.9

**Producers must apply pesticides in appropriate weather conditions, according to the directions on the label, and/or manufacturers' directions, with appropriate and well-maintained equipment.**

### Improvement Indicators

- 1.9.1** A formal plan for conducting pesticide application that details, at a minimum, that the following is in place on the farm:
- i. Instructions to comply with the requirements detailed on the label.
  - ii. The relevant weather conditions under which applications will and will not be undertaken for each field (including wind direction and taking into account the pesticide being applied), spray parameters (e.g. speed, pressure, nozzle size,

spray volume, boom height etc.), and all relevant sensitive areas, which are clearly identified on a farm map.

- 1.9.3** Weather monitoring equipment is used to monitor temperature, wind speed and direction, and humidity prior to and during application, with readings recorded.
- 1.9.4** Procedures for ensuring that workers are aware of and observe re-entry periods for any treated areas are in place.

## **CRITERION 1.10**

**Producers should dispose of used pesticide containers safely, or through a collection and recycling programme.**

### **Improvement Indicator**

- 1.10.2** Proportion of pesticides containers that are triple-rinsed, with the rinsate added to the spray tank, or disposed of safely.
- 1.10.3** Proportion of pesticide containers that are recycled.



## PRINCIPLE 2 – BCI Farmers Promote Water Stewardship

### CRITERION 2.1

The Producer must adopt a Water Stewardship Plan to help protect and conserve local water resources and identify opportunities for climate change adaptation. It should include all of the following components:

- 1.4.6.1.1 Mapping and understanding water resources;
- 1.4.6.1.2 Managing soil moisture;
- 1.4.6.1.3 Applying efficient irrigation practices to optimise water productivity (applicable to irrigated farms only);
- 1.4.6.1.4 Managing water quality;
- 1.4.6.1.5 Engaging in collaboration and collective action to promote sustainable water use.

### Core Indicators

- 2.1.1 A time-bound Water Stewardship Plan is defined that addresses each of the following components:
  - i. Mapping and understanding water resources;
  - ii. Managing soil moisture;
  - iii. Applying efficient irrigation practices to optimise water productivity (applicable to irrigation farms only);
  - iv. Managing water quality;
  - v. Engaging in collaboration and collective action to promote sustainable water use.
- 2.1.3 Water resources are identified, mapped and understood.
- 2.1.4 Soil moisture management practices to reduce soil water evaporation are implemented, as per the Water Stewardship Plan.
- 2.1.5 Irrigation methods and technologies are implemented to improve irrigation efficiency, as per the Water Stewardship Plan (applicable to irrigated farms only).
- 2.1.6 Irrigation timing is planned to maximise water productivity (applicable to irrigated farms only).
- 2.1.7 Irrigation is not conducted on a rigid pre-determined calendar schedule (applicable to irrigated farms only).
- 2.1.8 Risk to water quality is considered when managing and applying nutrients and pesticides, as per the Water Stewardship Plan.
- 2.1.9 Opportunities for collaboration and collective action (beyond the Producer’s unit of production) to achieve sustainable water use are identified.

**2.1.10** By March 2022, collaboration and collective actions (beyond the Producer's unit of production) towards local sustainable use of water are implemented, as per opportunities identified in the Water Management Plan.

## PRINCIPLE 3 - BCI Farmers Care For The Health Of The Soil

### CRITERION 3.1

The Producer must adopt a soil management plan to maintain and enhance soil health that includes all of the following components:

- i. Identifying and analysing soil type;
- ii. Maintaining and enhancing soil structure;
- iii. Maintaining and enhancing soil fertility;
- iv. Continuously improving nutrient cycling.

### Core Indicators

- 3.1.1** A time-bound soil management plan is defined that addresses each of the following components:
- i. Identifying and analysing soil type;
  - ii. Maintaining and enhancing soil structure;
  - iii. Maintaining and enhancing soil fertility;
  - iv. Continuously improving nutrient cycling.
- 3.1.5** Soil testing that includes NPK and pH analysis to determine the level of nutrients and acidity in the soil is conducted at least once every 5 years.
- 3.1.6** Soil type is identified and mapped.

### Improvement Indicators

- 3.1.7** Soil organic matter levels are monitored based on the need to enhance soil structure.
- 3.1.9** Tillage methods are conducted in a way that reduces soil compaction and damage to soil structure.
- 3.1.10** Nutrients are applied based on soil test results.
- 3.1.12** Crop diversity, such as crop rotation, is used to regenerate the soil.
- 3.1.13** A nutrition budget that considers all nutrient sources and crop exports of nutrients is developed.
- 3.1.14** Soil tests and leaf tests to assess nutrient levels and fertiliser needs during the growing season are used.
- 3.1.15** Fertilisers are applied using precision agriculture technologies.
- 3.1.16** Long-term nutrition trends are monitored.

## PRINCIPLE 4 - BCI Farmers Enhance Biodiversity And Use Land Responsibly

### CRITERION 4.1

The Producer must adopt a Biodiversity Management Plan that conserves and enhances biodiversity on and surrounding the farm and includes all of the following components:

- i. Identifying and mapping biodiversity resources;
- ii. Identifying and restoring degraded areas;
- iii. Enhancing populations of beneficial insects as per the Integrated Pest Management plan (Principle 1);
- iv. Ensuring crop rotation;
- v. Protecting riparian areas.

### Core Indicators

- 4.1.1** A time-bound Biodiversity Management Plan that addresses each of the five following components, is defined:
- i. Identifying and mapping biodiversity resources;
  - ii. Identifying and restoring degraded areas;
  - iii. Enhancing populations of beneficial insects, as per the Integrated Pest Management plan (Principle 1);
  - iv. Ensuring crop rotation;
  - v. Protecting riparian areas.
- 4.1.3** Biodiversity resources are identified and mapped.
- 4.1.4** Degraded areas on the farm are identified.
- 4.1.5** Measures to restore degraded areas are implemented, as per the Biodiversity Management Plan.
- 4.1.6** Measures are implemented to protect water courses and wetlands in and adjacent to the farm, including maintaining and/or restoring appropriate riparian and other buffer zones, as per the Biodiversity Management Plan.

### Improvement Indicator

- 4.1.9** Where unfarmed or grazed land is present on the farm, regular biodiversity surveys (covering wildlife and plant life abundance and condition) are conducted.

## **CRITERION 4.2**

**For the conversion of land used to grow cotton, the Producer must adopt the High Conservation Value approach and respect the right of local communities and indigenous people.**

### **Core Indicator**

**4.2.1** In the case of any proposed conversion from non-agricultural land to agricultural land, the BCI High Conservation Value risk-based simplified approach must be implemented.

### **Improvement Indicator**

**4.2.2** Where High Conservation Values are identified, a management and monitoring plan is established to maintain those values.

## PRINCIPLE 5 – BCI Farmers Care For And Preserve Fibre Quality

### CRITERION 5.1

The Producer must harvest, manage and store seed cotton to minimise trash, contamination and damage.

#### Core Indicator

**5.1.1** Good management practices for the harvest and storage of seed cotton are adopted.

#### Improvement Indicator

**5.1.2** No polypropylene, polyethylene or any synthetic bags are used during the harvesting of cotton by hand, nor during storage and transportation.

### CRITERION 5.2

The Producer should adopt management practices that maximise fibre quality.

#### Improvement Indicators

**5.2.3** A plan for managing fibre quality that includes the following elements - varietal selection, planting date, planting rate, row spacing, crop growth and weed management - is developed.

**5.2.4** Overall results for the quality of the crop at the end of the last season are reviewed.

**5.2.5** When fibre quality problems are identified, an attempt to understand the reasons for the problems (e.g. by discussing these with other relevant people such as consultants, agronomists, researchers and merchants) is undertaken, and actions to remedy the problems are implemented.

## PRINCIPLE 6 – BCI Farmers Promote Decent Work

### CRITERION 6.1

The Producer must ensure there is no child labour, in accordance with ILO Convention 138. In the case of family smallholdings, children may help on their family's farm provided that the work is not liable to damage their health, safety, well-being, education or development, and that they are supervised by adults and given appropriate training.

#### Core Indicators

- 6.1.1 There are no workers below the age of 15 (14 in certain specified countries), or below the minimum age for employment defined by local law (whichever is higher).
- 6.1.4 A written child labour policy, specifying under which circumstances and for which tasks children can or cannot work or be employed and why, has been communicated to farmers/workers/employees.

### CRITERION 6.2

The Producer must ensure that for hazardous work, the minimum age is 18 years.

#### Core Indicator

- 6.2.1 Hazardous work is not conducted by workers under 18.

### CRITERION 6.3

The Producer must ensure there is no forced or compulsory labour, including bonded or trafficked labour.

#### Core Indicator

- 6.3.1 All forms of forced or compulsory, including bonded or trafficked labour, are prohibited.

**CRITERION 6.4**

The Producer must not practise discrimination (distinction, exclusion or preference) that denies or impairs equality of opportunity, conditions or treatment based on individual characteristics, group membership or association.

**Core Indicators**

- 6.4.1** All forms of discrimination are prohibited.
- 6.4.2** A system is in place to detect and remediate any incident of discrimination on the basis of age, gender, ethnicity, nationality, social origin, religion, membership of a trade union or other workers' organisation, or any other characteristics that are not related to merit or the inherent requirements of the job.

**Improvement Indicator**

- 6.4.4** A written code of conduct or non-discrimination policy is communicated to farmers/workers/employees.

**CRITERION 6.5**

The Producer must observe the principle of equal pay for equal work.

**Core Indicator**

- 6.5.1** Equal wages are paid to workers who perform the same job, irrespective of gender.

**CRITERION 6.6**

The Producer must provide access to safe and hygienic sanitation facilities and to potable and washing water.

**Improvement Indicators**

- 6.6.1** Potable and washing water facilities are placed within reasonable proximity to the workplace and accessible to all.
- 6.6.2** All workers have access to adequate sanitation facilities.



**CRITERION 6.7**

**The Producer must provide all workers with a clean place to eat and access to adequate medical care.**

**Improvement Indicators**

- 6.7.1** All workers have access to adequate rest areas / food consumption facilities.
- 6.7.3** All workers have access to adequate medical care facilities or farm provides or subsidizes health insurance above any compulsory state provisions.

**CRITERION 6.8**

**The Producer should provide workers with regular health and safety training appropriate to the work they perform.**

**Improvement Indicators**

- 6.8.2** A written occupational health and safety policy is available at the farm and has been communicated to workers.
- 6.8.3** A formal staff induction and training programme for new employees that covers all relevant workplace health and safety requirements is conducted.

**CRITERION 6.9**

**The Producer should identify work hazards, inform workers of safe work practices, and adopt preventive measures to minimise hazards in the workplace.**

**The Producer must maintain records of any accidents and occupational illnesses.**

**Improvement Indicators**

- 6.9.2** A formal assessment of all potential workplace hazards, involving workers, has been conducted, and has led to the establishment of safe work practice procedures for all hazards.
- 6.9.3** Records of any accidents and occupational illnesses are maintained.

**CRITERION 6.10**

The Producer should ensure that measures are in place to deal with accidents and emergencies, including first aid, trained first aiders and access to appropriate transportation to medical facilities.

**Improvement Indicators**

**6.10.2** An accident and emergency procedure, including first aid kits, and access to appropriate transportation to medical facilities, is in place.

**6.10.3** Trained and qualified first aiders are present on the farm.

**CRITERION 6.11**

The Producer must guarantee all workers the right to establish and join organisations of their own choosing, and to draw up their own constitutions and rules, elect representatives, formulate programmes, and bargain collectively.

**Core Indicators**

**6.11.1** Workers have the right to establish or join organisations of their own choosing.

**6.11.2** There is no interference with the establishment and growth of workers' organisations or their activities.

**6.11.3** There is no interference with the right of workers to bargain collectively.

**Improvement Indicators**

**6.11.5** Proportion of employees who are members of a Trade Union or other form of worker representation organisation.

**6.11.6** Frequency at which the Producer or a senior staff member meets with employees.

**CRITERION 6.12**

The Producer should provide representatives from trade unions or other workers' organisations with access to reasonable facilities.

**Improvement Indicator**

**6.12.2** Reasonable facilities are available to Union or worker representatives when they visit the farm.

**CRITERION 6.13**

The Producer must ensure that all workers – waged and piece rate – are paid wages at least equivalent to the applicable legal national minimum wage or regional norm, whichever is higher; and that workers are paid regularly, on time, and through an appropriate method of payment.

**Core Indicator**

**6.13.1** Farmers in the PU are aware of the legally applicable minimum wage/s (statutory national or regional minimum wage applicable to agriculture, collectively agreed wage, industry minimum)

**Improvement Indicators**

**6.13.2** The wage rate paid to workers by the Producer is equal to or higher than the applicable minimum wage.

**6.13.3** Employees are paid more than 15% higher than the applicable minimum wage.

**6.13.4** Piece rate or wages adequate for workers to earn the applicable national minimum wage or regional norm (whichever is higher) are provided during normal working hours and under normal operating conditions.

**6.13.5** Wage records show that workers are paid regularly and on time through an appropriate method of payment.

**CRITERION 6.14**

The Producer must obtain the worker's consent in advance regarding all working conditions.

**Improvement Indicators**

**6.14.1** All workers are consulted about working conditions (including requirements relating to working hours and overtime), as part of the hiring process.

**6.14.2** All workers are employed with a written contract.

**CRITERION 6.15**

The Producer should keep adequate records on employment obligations, in accordance with national law and sufficient to enable monitoring.

**Improvement Indicator**

**6.15.1** Records on employment obligations are maintained on the following:

- i. personnel files (for each worker)
- ii. pay records
- iii. working hours record
- iv. workforce statistics
- v. union agreements
- vi. policies
- vii. health & safety
- viii. labour providers.

**CRITERION 6.16**

The Producer should ensure that temporary, seasonal, and (sub-) contracted workers receive equivalent benefits and employment conditions to permanent workers in relation to their period of employment.

**Improvement Indicator**

**6.16.1** All There is a policy on the treatment of temporary, seasonal and (sub-) contracted workers.

**CRITERION 6.17**

The Producer should ensure that working hours comply with national laws or relevant collective agreements, whichever is more favourable to the worker.

**Improvement Indicator**

**6.17.2** The Producer is aware of the minimum legal requirements and relevant collective agreements on working hours.

**CRITERION 6.18**

The Producer should ensure that overtime work is voluntary and remunerated in accordance with the law or applicable collective agreements.

**Improvement Indicator**

**6.18.2** Overtime hours are paid at a premium, in line with legal requirements.

**CRITERION 6.19**

The Producer must not engage in or tolerate the use of corporal punishment, mental or physical coercion, sexual harassment, physical or verbal abuse or harassment of any kind.

**Core Indicator**

**6.19.1** Use of corporal punishment, mental or physical coercion, sexual harassment or physical or verbal abuse or harassment of any kind, is prohibited.

**CRITERION 6.20**

The Producer must have a transparent policy and system for disciplinary measures, and must communicate this to workers.

**Core Indicators**

**6.20.1** A policy and system for disciplinary measures is available and communicated to workers.

**6.20.2** Any disciplinary actions are proportionate to the conduct in question, and the system in place includes fair warning principles.

**CRITERION 6.21**

The Producer should develop partnership and collaboration on decent work at local, regional or national level.

**Improvement Indicators**

**6.21.1** Number of alliances or partnerships established with local organisations on decent work.

- 6.21.2** Number of outreach activities to specific target groups beyond farmers (e.g. women, children, casual workers, migrant workers, local authorities, school teachers, pesticide applicators, cotton pickers, etc.).
  
- 6.21.4** A specific person or group is in place to actively promote Decent Work within the community (e.g. Decent Work committees, child labour monitoring committees, local pressure group, lead farmer, etc.).

## **CRITERION 6.22**

**The Producer must develop effective producer organisation and/or strengthen existing ones.**

### **Improvement Indicators**

- 6.22.5** The Producer is a member of a local producer organisation.

## PRINCIPLE 7 – BCI Farmers Operate An Effective Management System

### CRITERION 7.1

The Producer must develop and implement a Continuous Improvement Plan.

#### Core Indicator

- 7.1.1** A Continuous Improvement Plan is available, implemented and monitored according to the applicable Better Cotton Initiative Continuous Improvement planning process, and reviewed annually.

### CRITERION 7.2

The Producer must ensure that BCI Farmers and workers receive regular training on best practices to achieve the Better Cotton Initiative Principles and Criteria Core Indicators and relevant Continuous Improvement Plan goals.

#### Core Indicators

- 7.2.1** A training plan identifying the key sustainability issues to be addressed for the Producer, the name of the training provider(s), scheduling and expected participants is available and implemented.
- 7.2.2** Training materials for BCI Farmers and workers are available to cover Better Cotton Initiative Principles and Criteria Core Indicators, with a focus on key sustainability issues in the local context. Best practices (validated locally) related to production are shared with BCI Farmers through appropriate dissemination material in the local language.
- 7.2.3** The Producer reports annual data on number of BCI Farmers and workers trained by gender/topic/methodology to demonstrate the implementation of the training plan.
- 7.2.4** The Producer operates a system to:
- i. Assess and document the level of adoption of practices promoted through training;
  - ii. Identify and address the risks associated with adopting the practices promoted through training;
  - iii. Evaluate the training materials continuously to improve their content and delivery.

**CRITERION 7.3****The Producer must operate a data management system.****Core Indicators**

- 7.3.2** The Producer maintains a farm-level record keeping mechanism e.g. Farmer Field Book for essential production data on inputs and outputs in an accurate manner.
- 7.3.3** The Producer operates a system to collect, compile and report complete and accurate Results Indicator data in accordance with the Results Indicator Reporting template.
- 7.3.4** The Producer creates and maintains a profile of the farm labour force, including estimates of numbers of workers, as per the Better Cotton Initiative defined worker categories and disaggregated by gender. The labour profile is updated annually, at the latest one month after sowing.
- 7.3.6** The Producer maintains receipts of sales of Better Cotton, including the buyer name, date, and volume, for at least one year. The Large Farm Manager is able to collect and submit these sale records to BCI upon request.

**CRITERION 7.4****The Producer must monitor and review risks of noncompliance and implementation of corrective actions.****Core Indicator**

- 7.4.1** The Producer operates a system to:
- i. Identify and address the risks of non-comformity with core indicators;
  - ii. Plan and enforce the implementation of Corrective Actions resulting from monitoring activities.