

BETTER COTTON ASSURANCE PROGRAM CONTINUOUS IMPROVEMENT PLAN TEMPLATE FOR SMALLHOLDERS

APPLICABLE FROM 2014 HARVEST SEASON

Orientation	<i>The Better Cotton Performance Scale for Smallholders includes as Minimum Requirements the following (under Management Criteria): 'Continuous improvement plan available at PU level and reviewed by PU on annual basis'. This document supports Producer Unit in preparing their plan for each BCI Criteria.</i>
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BCI Production Criteria	Content of the Continuous Improvement Plan
<p>1.1 An Integrated Pest Management Programme is adopted that includes the following principles:</p> <ul style="list-style-type: none"> i) growing of a healthy crop; and ii) prevention of build-up of pest populations and of the spread of disease; iii) preservation and enhancement of populations of beneficial organisms; and iv) regular field observations of the crop's health and key pest and beneficial insects; and v) management of resistance. 	<p>The Producer Unit has a locally adapted and time-bound plan based on agro-ecosystem analysis that provides the specific practices to implement the 5 principles of IPM.</p>
<p>1.2 Only pesticides that are: (i) registered nationally for the crop being treated; and (ii) correctly labelled in the national language are used.</p>	<p>Planning is undertaken for the use of alternative pesticides to any non-registered or incorrectly labelled pesticides that may have been used, and the plan includes information on the legally available alternative pesticides and on alternative methods.</p>
<p>1.3 Pesticides listed in Annex A and B the Stockholm Convention are not used.</p>	<p>Planning is undertaken for the use of alternative pesticides to any Stockholm-listed pesticides that may have been used - information on the legally available alternative pesticides and on alternative methods.</p>
<p>1.4 Pesticides are prepared and applied by persons who are:</p> <ul style="list-style-type: none"> (i) healthy; and (ii) skilled and trained in the application of pesticides; and (iii) 18 or older; and (iv) not pregnant or nursing 	<p>Instances where pesticides are not applied in accordance with the criterion are identified. Details included on how the Producer Unit will ensure that unhealthy people, people without training, people below the age of 18 and pregnant or nursing women do not prepare and apply pesticides with specific reference to who is allowed to prepare and spray pesticides. Producer Unit has a system in place to document worker age and tasks</p>
<p>1.5 Use of pesticides in any of the following categories: (i) WHO list of hazardous pesticides Class 1a and 1b, (ii) those listed in Annex III of the Rotterdam Convention,</p> <p>is phased out, with the timeline based on the availability of better alternatives and ability for the risk to be properly managed</p>	<p>If pesticides listed in the Criterion are being used, details on how to use alternative pesticides and alternative methods – phasing out plan in place with clear timelines.</p>
<p>1.6 Pesticides are always prepared and applied by persons who correctly use appropriate protective and safety equipment</p>	<p>Details on how to correctly use appropriate protective and safety equipment when preparing and applying pesticides, i.e.:</p> <ul style="list-style-type: none"> • use of appropriate PPE in accordance with the pesticide being used and its label requirements • label instructions are followed • proper maintenance and cleaning of PPE • use of appropriate preparation and application methods • applicators have access to appropriate facilities for washing themselves after handling/applying pesticides

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1.7 Pesticide application equipment and containers are stored, handled and cleaned so as to avoid environmental harm and human exposure	<p>Details on the development of appropriate storage, handling and cleaning facilities / techniques. The plan includes specific actions to be undertaken for safe storage, handling and cleaning, and the timeframes for their implementation.</p> <ul style="list-style-type: none"> • Pesticides should be stored and transported safely in their original transport containers and kept in designated safe areas out of reach of children. • Pesticide containers should not be re-used for any purposes. • Empty pesticides containers should be stored, labelled and handled appropriately and securely until they are collected /disposed of. • spill cannot seep into water supplies
1.8 Pesticides are applied in appropriate weather conditions, according to label directions and or manufacturer's directions, with appropriate and well-maintained equipment	<p>Details on how pesticide applications are to be carried out, taking into account the need to apply them in appropriate weather conditions, in accordance with label directions and using appropriate and well-maintained equipment.</p> <ul style="list-style-type: none"> • Applications should be made taking into account the potential effects on surrounding areas. • Re-entry periods should be adhered to. • Equipment should be inspected regularly and used only if good condition.
1.9 Used pesticide containers are collected by a recycling programme, or disposed of safely	<p>Details how the proper storage / disposal / recycling of empty pesticide containers will be undertaken safely, including time-frame</p>
2.1 Rain fed cotton: Water management practices are adopted that optimise water use	<p>Details on the management practices to capture rain fall / store and conserve moisture in the soil to be implemented. For rain-fed farms, optimising the use of water revolves around ensuring that water that falls on the farm can be captured on the farm and used by the crop. Use of cover crops, adopting a conservation tillage farming system, retaining crop stubble where possible, slowing the speed at which water flows across the farm (which will also help control erosion) and opportunity cropping are examples of ways to optimise water use.</p>
2.1 Irrigated: Water management practices are adopted that optimise water use	<p>Details on how irrigation system is to be managed and monitored, including the irrigation scheduling programme (how irrigation timing is to determined so as to optimise water use), and for pressurised systems, the system maintenance programme and schedule. For irrigation farms, optimising the use of water requires consideration of the range of issues noted above for rain-fed cotton farming, as well as the consideration of every stage of water movement, from the initial extraction of the water, to its application and use by the crop, to the recycling of any water that runs off the crop. Thus optimisation of water use includes good management of storage and delivery systems, as well as of the irrigation of the</p>

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	crop itself. Records should be maintained on irrigation timing (date of irrigation) and water applied for each field.
2.2 Management practices are adopted to ensure that water extraction does not cause adverse effects on groundwater or water bodies	Potential impacts are identified. Details on the management practices to minimise adverse effects on groundwater or water bodies to be implemented. Details of how ground-water extraction impacts will be monitored. Record of the volume of water extracted should be maintained.
3.1 Soil management practices are adopted that maintain and enhance the structure and fertility of the soil	Soil structure problems are identified. Details on the management practices to maintain and enhance soil structure and to increase soil organic matter content to be implemented (e.g. zero tillage, cover crops, crop residue maintenance and use of crop/legume rotations, choice of tillage equipment, etc.)
3.2 Nutrients are applied on the basis of crop and soil needs. Timing, placement and quantity applied are all optimised.	Details on how soil and crop monitoring is conducted to determine nutrient application types, rates and timing; Nutrients should be applied on the basis of identified crop and soil need. Application should be appropriate to the type of nutrient being applied and the growth stages of the crop.
3.3 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.	Details on the management practices to be adopted that will help control water flows and erosion, and to repair any serious existing erosion problems (gullies). Regular monitoring of areas that are at risk of eroding and of areas with an existing erosion problem should be conducted. Areas with visual signs of erosion should be actively managed with appropriate control practices.
4.1 Practices are adopted that enhance biodiversity on and surrounding the farm	Details of the practices to enhance biodiversity on and surrounding the farm, and to control invasive species to be implemented. To lessen their impact on biodiversity, cotton farmers can conserve or restore areas of natural habitat on their land. The protection of riparian land – the land surrounding water bodies – is particularly important, as it is often the most fertile and productive part of the landscape. It is important that riparian land is protected from farm run-off and that it is not cleared of vegetation. Removal of riparian vegetation can lead to the destabilisation of stream and river banks, and increased erosion. Management practices adopted to help achieve other Criteria, such as IPM, pesticide choice (using the least disruptive option), soil fertility, and erosion control, will all contribute to enhancing biodiversity both on and off the farm. Opportunities to provide or enhance off-farm biodiversity through local/national producer collaboration may be possible, and should be explored
4.2 The use and conversion of land to grow cotton conforms with national legislation related	Details of the specific legislative requirements to ensure that use of the land and any planned conversion complies with national legislation; How to ensure that any changes in the

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to agricultural land use.	legislation become known and incorporated in the plan to respect national legislation. Cotton should be grown only on legally used and converted land.
5.1 Management practices are adopted that maximise the fibre quality	Details of the identified management practices for maximising fibre quality (such as varietal selection, planting date, harvest date, water, weed and nutrition management). Varieties appropriate for the region should be planted in the recommended planting time period.
5.2 Seed cotton is harvested, managed, and stored to minimise trash, contamination and damage	<p>Operations that pose a risk of contaminating seed cotton are identified. Details of the practices for harvesting, storing and transporting seed cotton so as to avoid contamination. Cotton should be:</p> <ul style="list-style-type: none"> • Harvested using appropriate management practices especially regarding the use of non-contaminating harvest bags, • stored using appropriate management practices especially regarding the use of clean storage areas, and segregation according to quality; • transported so as to prevent contamination.
6.1 Smallholders (including tenants, share-croppers and other categories) have the right, on a voluntary basis, to establish and develop organisations representing their interests	Existing organisations able to represent cotton smallholders are identified. Details included on how to ensure that smallholders can establish and develop or join organisations representing their interests.
6.2 Access to potable and washing water is provided.	Details on how to provide potable and washing water in an appropriate manner over a defined timeframe. Drinking and washing water facilities should be placed within reasonable proximity to the workplace and accessible to all.
6.3 There is no child labour, in accordance with ILO Convention 138.(See ILO Convention 138)	<p>Instances where child labour does or is likely to occur are identified. Details on how to proactively prevent children below the national minimum age to working on the farm, including a procedure for checking age of workers and/or requiring age documentation for employees as a condition of employment and keeping documentation on record.</p> <p>Details on how existing child labour will be removed in an appropriate manner (corrective actions avoid harming children or their families; children are transferred to education, the income of the family is compensated by either employing the parent of the child laborers or by other means) with a specified timeframe for completion.</p>
6.3 Exceptionally, 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.	<p>Understanding on the nature of the exception for family smallholdings and the meaning of 'light work'. Details included on how to supervise and train children helping on family smallholdings. Children aged under the national minimum age for access to employment may help on their family's farm in certain defined conditions, and these conditions are cumulative</p> <p>(i) children may only work on family smallholdings if their work</p>

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	<p>is structured so as to enable them to attend school</p> <p>(ii) this work should not be so demanding as to undermine their education</p> <p>(iii) they should not perform tasks that are hazardous for them because of their age</p> <p>(iv) they must be guided – both in terms of learning skills and supervision of tasks – by a family member</p> <p>(v) they have attended appropriate training</p>
<p>6.4 For hazardous work, the minimum age is 18 years of age</p>	<p>In accordance with national legislation activities in the cotton cultivation cycle which are deemed to constitute hazardous labour are identified. Details included on how persons below the age of 18 will not carry out hazardous work with specific reference to who is allowed to prepare and spray pesticides. Details on how to ensure that producers have a procedure in place to document worker age and tasks.</p>
<p>6.5 Employment is freely chosen: no forced or compulsory labour, including bonded or trafficked labour</p>	<p>Any instances of forced labour are identified. Details on how to ensure that employment is freely chosen. All workers should be employed on a voluntary basis on terms that respects local laws. Producers shall not bind workers to employment as a condition of fulfilling terms of a debt to a third party or to the producer. Any wage advances given to the workers in order to secure employment should be interest free, of reasonable value, documented and should not contribute to bonded labour. Workers shall retain possession or control of their identity cards, identity papers, travel documents, or any other personal documents such as land deeds or house mortgage. Producers shall not retain any such documents or restrict workers' access to them for any reason whatsoever, including in order to ensure that workers shall remain in employment in the farm.</p>
<p>6.6 There is no discrimination (distinction, exclusion, or preference) practised that denies or impairs equality of opportunity, conditions, or treatment based on individual characteristics and group membership or association.</p>	<p>The most common forms of discrimination and the minority and majority groups are identified. Forms of discrimination may include but are not limited to gender based wage discrimination, ethnicity/caste/gender based work allocation, access to facilities and any kind of harassment including sexual harassment. Details included on how to improve the position of the disadvantaged groups in an appropriate manner with a specified timeframe for completion.</p>