BETTER COTTON PRINCIPLES AND CRITERIA REVIEW

FIRST CONSULTATION AND SECOND MEETING OF THE STANDARD SETTING AND REVISION COMMITTEE

FEEDBACK SYNOPSIS

MARCH 2016
1.1 Introduction

The first draft of the BCI Principle and Criteria was released for a public consultation period of sixty days between December 2015 and February 2016. This draft had been developed by a membership technical committee, with additional input from BCI Country Teams and global key stakeholders providing technical expertise. It was clear to the BCI Project Team that this was very much a first draft as the introduction highlighted. There were still many pending issues in the pre-draft version that the Standard Setting and Revision Committee members, in their first meeting in September 2015, could not find agreement on and deemed as necessary to be subject to consultation. The consultation drew over 43 responses, both grouped and individual from BCI membership and stakeholders. These responses were in the form of completed surveys submitted via online software; PDF forms highlighting major issues and opinion and feedback collected from regional and national workshops.

1.2 Analysis of the Online Survey

Following the consultation, the BCI Project Team analysis focused on principal changes called “Main issues” already identified in the Pre-draft. The process of analysing the comments began with a quantitative analysis of the results of the online survey by the BCI Project Team. This analysis highlighted some clear trends based on the responses received across the membership categories and beyond.

Analysis of the survey shows particular interest in Principle 1, 2 and 6 from those who responded. It also showed that there were relatively few responses from Brand and Retailers compared to multiple responses from Civil Society stakeholders. To this extent the online survey quantitative analysis revealed that some categories were more involved in the revision process than others.

Also, 20% of respondents were BCI staff members and a bit more than half were members amongst which 50% were Implementing partners, entities working on within the BCI system on a daily basis.

1.3 Analysis from the Standard Setting and Revision Committee and main trends

The BCI Project Team developed a stakeholder consultation report and a working document taking on main trends extracted from the survey results. Those trends from the consultation were captured through graphs and tables and recommendations on how to proceed were suggested by the Project Team.

Each member of the BCI Standard Setting and Revision committee was asked to review those documents in preparation for the face-to-face meeting in Utrecht on March 9 and 10, 2016.
At the meeting, the committee reviewed results from the consultation and discussed the way to address each of them in light of Project Team recommendations. Some significant trends emerged from the review and the committee elaborated on how to best incorporate those issues into the second draft.

For the meeting non substantive issues only requiring brief discussion and a decision on how to proceed were taken out. Focus was brought to substantial and structural issues as well as well-known issues sometimes facing strong and opposing opinions and those having ramifications across the standard.

1.4 Addressing Main Issues

There were a certain number of outstanding issues needing further discussion and a decision to be taken by the committee. Most issues related to structural aspects were not questioned during the consultation and were easily validated during the meeting. They were indeed mostly validated during the first meeting.

Discussions were focused on content-related aspects. The committee members discussed and reached agreement on each discussion topics as follows:

- **Preamble:**
  - Inclusion of a 7th principle dedicated to management: Agreement to create the principle and the need to specify in “intent” section that this principle differs from the 6 others dedicated to production matters.
  - How to address climate change: Agreement on referring to climate issues (mitigation and adaptation) as a component of environmental resources management plan that will be required under P1, P2, P3 and P4. Also, an annex will be developed to explain how climate issues are addressed throughout the standard.
  - Level of prescription to bring to the standard: To reinforce the level of prescription, it was decided to have a three option approach: either add indicators; or provide more guidance or develop components of management plan (especially for environmental resources management).

- **Crop protection:**
  - Reinforcement of approach towards pest management under P1: Agreement on banning Rotterdam convention and Montreal protocol pesticides and phasing out WHO 1a and 1b within a dated timeframe and development of a support package on alternatives.
  - Natural substance use: It was agreed to explore a stakeholder proposal to refer to OISAT (Online Information Service for Non-Chemical Pest Management in the Tropics) database. BCI Project Team will investigate.
  - Basic and Appropriate PPE: Agreement on the need to establish a definition for basic PPE. Also, agreement was found that basic PPE will be a minimum criterion while “appropriate PPE” will be minimum for LF and improvement for MF/SH.
➢ Water stewardship:
   - Name of the Principle: Agreement on the decision to move towards “water stewardship”.
   - Scope of the principle: Agreement on the necessity to go beyond water efficiency and broaden the scope of the principle towards water stewardship, which involves taking into account availability and quality of water resources on and eventually surrounding the farm. Decision to set a BCI water management plan which includes the following components:
     1. Water resources identification/mapping
     2. Reduction/elimination of non-productive evaporation losses of water
     3. Continuous improvement towards irrigation efficiency/deficit irrigation
     4. Catchment-level collaboration / Collective action
   An additional component on water quality will be explored by the Project Team. The Project Team will further develop the components and suggest appropriate criteria and indicators. It will also explore supporting documentation to be referenced in guidance.

➢ Soil Health:
   - Criterion 3.1 as a minimum requirement: Agreement on the need to apply the soil management planning approach and the necessity to make some components a minimum for all farmer category. Project Team will define components and resubmit to members before validating second draft version.

➢ Biodiversity enhancement
   - Name of the Principle: Agreement on principle name as “Biodiversity enhancement” and “conserve and enhance” at criteria level. Sustainability target is to first enhance biodiversity and then maintain/conserve.
   - Scope of criteria 4.1 on biodiversity enhancement: Agreement on requiring a biodiversity management plan starting with biodiversity mapping. The Project Team will define the appropriate level of assessment.
   - Land Use change: A definition of conversion in the context of cotton farming was adopted (Conversion of land from the status of non-agricultural to agricultural). Agreement was reached to apply the following Land Use change approach:
     - An HCV assessment must have been done prior to conversion.
     - In case of PU, conversion is based on a certain percentage.
     - Different level of HCV assessment (light to complex) will be conducted depending on farmer category/context.
     - If HCV are identified, management and monitoring plans are developed and implemented.
   Project Team will further define indicators within 4.2 and resubmit to SSRC members before second consultation.

➢ Decent work
   - Child labour: Agreement that remediation aspects of child labour needs to be covered in the Standard. Project Team will build a criterion on Child Labour remediation.
- Minimum wage: Agreement on the fact that minimum wage as set by the government (provided they exist) needs to be minimum. Maintain an improvement criterion for regional and living wage to be covered by an IR, defined by a certain percentage over regional norm.
- Labour contractors and subcontractors: Agreement on the fact that the Principle applies to all workers regardless of the nature of employment.
- Tenant and sharecroppers: Agreement to consider that tenant and sharecroppers are a type of worker and therefore should not have a dedicated criterion. Decision to remove current criterion 6.6.

1.5 Way forward

As a result of this first public consultation and subsequent standard committee meeting, some of the feedback will be immediately incorporated into the draft, such as added and improved definitions, clarity on the scope and who criteria/indicators apply to, as well as improvement of guidance and intent sections. While not all feedback leads to a concrete change, it has provided valuable insight on the perspectives of our stakeholders.

The Project Team will now focus on tasks resulting from the SSRC meeting and will come up with a new draft within the next month (mid-April).

A special effort will be made to reach out to all membership categories, notably Brand and Retailers who were underrepresented during the first round.