BCI Gin Monitoring Reporting Template

2018

# Introduction

This reporting template is designed to be used during gin monitoring and audit visits for gins that are buying and selling Better Cotton. It is applicable for BCI staff or consultants carrying out second-party gin monitoring visits as well as third-party verifiers carrying out gin audits against the [*Better Cotton Chain of Custody Guidelines v1.3*](https://bettercotton.org/wp-content/uploads/2014/01/Better-Cotton-Chain-of-Custody-Guidelines-2018-v1.3.pdf). Annex 1 includes a table where interviews (i.e. with workers) may be recorded.

# Gin Information

|  |  |  |  |
| --- | --- | --- | --- |
| Gin Name |       | BCI Code: |       |
| Address | Street address |       |
| State  |       | Country |       |
| BCI contact name and role |       |
| Additional contact names |       |
| Date of monitoring visit or audit |       |
| Name of assessor(s) |       | Organisation |       |

# Summary Outcome

Were any Minor Non-Conformities observed? [ ]  Yes [ ]  No

Were any Major Non-Conformities observed? [ ]  Yes [ ]  No

***Note:*** *A non-conformity (NC) is graded as Minor if it is an isolated event that is limited in temporal and spatial scale, and where an effective internal management system was in place that should have prevented or detected the issue. A NC can also be graded as Minor if it does not result in a fundamental failure to achieve the objective of the relevant requirement.*

*A non-conformity (NC) is graded as Major if it results in, or is likely to result, in a fundamental failure to achieve the objective of the relevant requirement (either alone or in combination with other NCs). Major NCs typically continue over a period of time or are repeated or systematic in nature.*

Based on the outcome of the gin audit or monitoring visit, do you recommend suspending the gin’s Better Cotton Platform account?

 [ ]  Yes [ ]  No

Please list all Non-Conformities (NCs) in the table below

| **Chain of Custody Requirement No.** | **Description of Non-Conformity** | **Grading** | **Deadline to Close NC[[1]](#footnote-1)** | **Comments** |
| --- | --- | --- | --- | --- |
|       |       | [ ]  Minor [ ]  Major |       |       |
|       |        | [ ]  Minor [ ]  Major |        |        |
|       |        | [ ]  Minor [ ]  Major |        |        |
|       |        | [ ]  Minor [ ]  Major |        |        |
|       |        | [ ]  Minor [ ]  Major |        |        |
|       |        | [ ]  Minor [ ]  Major |        |        |
|       |        | [ ]  Minor [ ]  Major |        |        |
|       |        | [ ]  Minor [ ]  Major |        |        |
|       |        | [ ]  Minor [ ]  Major |        |        |
|       |        | [ ]  Minor [ ]  Major |        |        |

# 4.1 Purchasing of Better Cotton

| **Requirement**  | **Grading** | **Comments/ Specific Evidence** |
| --- | --- | --- |
| **4.1.1** The gin shall be responsible for ensuring that all Better Cotton purchased can be traced back to licensed BCI farmers | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.1.2** The gin shall accurately document its process for procuring Better Cotton and the flow of Better Cotton from farmers to the gin (including the role of middlemen, markets, storage, transport, etc.) | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.1.3** The gin shall keep accurate records of all purchases of Better Cotton, including name of the seller, purchase date, volume, and AAV or farmer code (if purchasing directly from a farmer) | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.1.4** If the gin purchases Better Cotton from a market or middleman (rather than a farmer), the ginner shall in addition: a) Maintain an up-to-date list of the names/ contact information for all markets or middlemen from which Better Cotton is purchasedb) Ensure that all middlemen have systems in place to keep Better Cotton segregated from conventional cotton and can trace Better Cotton back to licensed farmersc) Obtain from each middleman records of their relevant purchases from licensed BCI farmers, including the farmer name or code, date of purchase, and volume. | [ ]  Compliant[ ]  Minor NC[ ]  Major NC[ ]  N/A |       |
| **4.1.5** The gin shall provide receipts to farmers where Better Cotton is purchased directly from licensed BCI farmers. | [ ]  Compliant[ ]  Minor NC[ ]  Major NC[ ]  N/A |       |

# 4.2 Segregation and identification of Better Cotton

| **Requirement**  | **Grading** | **Comments/ Specific Evidence** |
| --- | --- | --- |
| **4.2.1** The gin shall have a system in place to ensure that Better Cotton is segregated from other (conventional) cotton and is clearly identified at every stage of purchase, storage, processing, transport, and handling. | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.2.2** The gin shall ensure that all staff or workers handling Better Cotton are aware of the system for segregating and identifying Better Cotton  | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.2.3** The gin shall ensure that all Better Cotton bales sold can be clearly identified as Better Cotton | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |

# 4.3 Responsibilities, training and record-keeping

| **Requirement** | **Grading** | **Comments/ Specific Evidence** |
| --- | --- | --- |
| **4.3.1**The gin shall appoint a designated representative(s) responsible for ensuring compliance with the relevant BCI Chain of Custody Guidelines and recording relevant data on the Better Cotton Platform (BCP) | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.3.2**The gin shall ensure that all individuals responsible for handling Better Cotton, using the BCP, and maintaining associated records are trained and competent to fulfil BCI requirements a) All individuals responsible for using the BCP shall complete the mandatory BCI training on the BCP | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.3.3**The gin shall maintain all documents and records related to the purchase, handling, and sale of Better Cotton for a minimum period of two years.a) The gin shall ensure that all documents are available for review by BCI or third-party auditors upon request. | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.3.4**The gin shall communicate any changes in BCI contact names, procurement processes, or outsourcing arrangements to BCI in writing or email within 15 days of the change occurring | [ ]  Compliant[ ]  Minor NC[ ]  Major NC[ ]  N/A |       |

# 4.4 Use of the Better Cotton Platform

| **Requirement**  | **Grading** | **Comments/ Specific Evidence** |
| --- | --- | --- |
| **4.4.1** The gin shall enter all purchases and lint production, and enter (or acknowledge) all sale transactions for Better Cotton into the BCP, within 30 calendar days of the transaction date | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.4.2** The gin shall only enter or acknowledge transactions in the BCP if they correspond to a genuine purchase or sale of physical Better Cotton | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.4.3** The gin shall ensure that all data entered into the BCP is accurate and can be verified against corresponding documentation (i.e. purchase receipt, invoice, production records):1. For each purchase of Better Cotton, the gin shall enter the corresponding purchase date or date range into the BCP
2. For each sale of Better Cotton, the gin shall enter a valid transaction reference number(s) corresponding to either the invoice or shipping documents
 | [ ]  Compliant[ ]  Minor NC[ ]  Major NC |       |
| **4.4.4**If requested to provide an average ginner turnout ratio, the gin shall ensure that this ratio (volume of lint produced for a given volume of seed cotton processed, expressed in percentage) is accurately calculated and can be verified through documentation. | [ ]  Compliant[ ]  Minor NC[ ]  Major NC[ ]  N/A |       |

# 4.6 – 4.7 Other Chain of Custody Requirements

This section includes relevant requirements from section 4.6 (Subcontractors) and 4.7 (Supply Chain Monitoring and Penalties). Note that requirements may not be applicable to all gins; in this case just tick ‘N/A’ and the comment field can be left blank.

| **Requirement** | **Grading** | **Specific Evidence/ Comments** |
| --- | --- | --- |
| **4.6.1** If the gin outsources any handling of Better Cotton (excluding transportation) to a subcontractor or independent organisation, the gin shall:1. Document the nature of this outsourcing agreement, including the names, addresses, and contact details of any subcontractors, and share with BCI in writing
2. Ensure that only the gin (not subcontractors) have access to the Better Cotton Platform and are responsible for entering data into the system
3. c) Require all subcontractors buying, selling, or handling Better Cotton to sign a declaration agreeing to comply with relevant BCI CoC requirements and to provide access to their premises and records for any BCI staff or third-party auditors.
4. Ensure that only the gin (not subcontractors) have access to the BCP and are responsible for entering data into the system

  | [ ]  Compliant[ ]  Minor NC[ ]  Major NC[ ]  N/A |       |
| **4.7.1** The gin shall provide BCI staff and appointed third-party auditors access to all sites handling or selling Better Cotton, and access to any records or documentation 1. Documents requested remotely shall be provided within 10 calendar days of the written request
2. Within 24 hours of being notified of a short-notice audit, the ginner shall provide access to the site for BCI or designated third-party auditors
 | [ ]  Compliant[ ]  Minor NC[ ]  Major NC[ ]  N/A |       |
| **4.7.2** If during gin monitoring visits or gin audits, BCI staff or third-party auditors identify nonconformities(NCs) with Chain of Custody requirements, the gin shall correct these NCs within the specified timeframe (*12 months for minors and 30 days for major NCs – refer to CoC Guidelines*)***[Guidance: this requirement will apply to non-conformities from previous monitoring visits]*** | [ ]  Compliant[ ]  Minor NC[ ]  Major NC[ ]  N/A |       |
| **4.7.4** If the ginner agreement is cancelled and/or use of the BCP is suspended, the gin shall notsell any cotton as ‘Better Cotton’ or enter any transactions into the BCP until the agreementis reinstated.  | [ ]  Compliant[ ]  Minor NC[ ]  Major NC[ ]  N/A |       |

# Annex 1: Worker interview record

This is an optional (but recommended) table for recording interviews. Worker names can be withheld due to confidentiality. In these cases, a short description of the role is sufficient.

| **Interviewee name / description of role** | **Date and time interviewed** | **Summary of interview notes** |
| --- | --- | --- |
|       |       |       |
|       |       |       |
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|       |       |       |

1. Minor NCs: Gin shall correct the NC within 12 months and provide evidence to BCI or the third-party auditor demonstrating how the issue has been addressed.

 Major NCs: gin shall correct the NC within 30 days and provide evidence to BCI or the third - party auditor demonstrating how the issue has been addressed. [↑](#footnote-ref-1)