

BCI Assurance Manual v4.0

February 2020



About This Document

This document sets out the main requirements of the BCI assurance model for key stakeholders. It is intended to be a reference manual for Implementing Partners, Producers, BCI staff, and third-party verifiers, to ensure consistent implementation of assurance requirements across all BCI projects. The assurance model is applicable with the [Better Cotton Principles and Criteria, Version 2.1](#).

Issue date	4 February 2020
Effective date	1 April 2020 (for all Producers participating in the BCI Programme for the 2020/21 season)
Previous version	This document replaces the previous version 'The Better Cotton Assurance Programme' v3.1, published in March 2019
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Table of Contents

Glossary of Key Terms	4
1 Introduction	6
About the BCI Assurance Model	6
Producers Under the BCI Assurance Model	6
Supporting Documents.....	7
Stakeholder Roles.....	7
Overview of Licensing Requirements	9
2 Summary of Large Farm Requirements	12
2.1 Initial Licensing.....	12
2.2 Active Licence Period.....	12
2.3 Licence Renewal	12
3 Summary of Producer Unit Requirements	14
3.1 New PUs Entering the BCI Programme	14
3.2 Readiness Check and Recommendation for Licensing.....	14
3.3 Initial Licensing.....	14
3.4 Active Licence Period	15
3.5 Licence Renewal	15
4 Set-Up of New Producer Units	17
4.1 Set-Up Phase.....	17
4.2 Timing of the Set-Up Phase.....	17
5 Overview of Assessment Types	19
6 Self-Assessment and Internal Assessment	20
6.1 Overview	20
6.2 Internal Assessment (PUs only).....	20
6.3 Self-Assessment Format and Timing.....	21
7 Readiness Checks (PUs only)	21
7.1 Overview	21
7.2 Format and Timing	22
7.3 Readiness Check Outcomes	23
8 Licensing Assessments	23
8.1 Overview	23
8.2 Format and Timing	24
8.3 Outcome of Licensing Assessments.....	25
9 PU Support Visits (PUs only)	26
9.1 Overview	26

9.2	Format and Timing	27
9.3	Outcomes of PU Support Visits	27
10	Surveillance Assessments (PUs only).....	28
10.1	Overview	28
10.2	Sampling	28
10.3	Format and Timing	28
10.4	Outcome of Surveillance Assessments.....	28
11	Additional Verification Activities.....	29
11.1	Additional Verification Activities	29
12	Continuous Improvement	30
12.1	Continuous Improvement for Producers	30
13	Licensing Decisions	31
14	Active Licence Period	31
15	Annual Licensed Volumes	32
16	Licence Cancellation	32
16.1	Licence Cancellation	32
16.2	Other Reasons for Licence Cancellation.....	34
17	Non-conformities and Corrective Actions.....	34
18	Variations and Extensions.....	36
19	Appeals Process.....	37
20	Oversight.....	37
	Annex A. Timeline of Assurance Activities.....	38
	Annex B. Large Farm Group Model	39

Glossary of Key Terms

Annual Authorised Volume (AAV) Code

The AAV code is a unique number generated by BCI for licensed Producers (Large Farms or Producer Units). AAV codes allow gins buying from licensed BCI Farmers to enter purchases of seed Better Cotton into the Better Cotton Platform (BCP) and allocate the volumes back to the corresponding Producer.

Better Cotton

Better Cotton is cotton that has been produced by licensed BCI Farmers, or by farmers licensed under a recognised equivalent standard. Licensed BCI farmers have been assessed as compliant with the Core Indicators of the Better Cotton Principles and Criteria (P&C) – Version 2.1 and have fulfilled the Licensing Requirements outlined in the BCI assurance model. Farmers licensed to sell Better Cotton produce cotton in a way that cares for people and the environment, ensuring decent work conditions for workers and caring for water, soil health and natural habitats.

Better Cotton Platform (BCP)

The Better Cotton Platform is BCI's online system for tracking purchases/ sales of Better Cotton and associated Better Cotton Claim Units (BCCUs). BCCUs are designated units that correspond to 1 kg of Better Cotton lint produced from seed Better Cotton. The BCP is used by BCI and registered supply chain organisations that are buying, selling, or sourcing Better Cotton products. It enables suppliers and manufacturers to report to their customers how much Better Cotton lint was sourced through the sale of a physical product.

Continuous Improvement Plan (CIP)

The Continuous Improvement Plan is a plan completed by the Producer which identifies priority sustainability improvements, establishes targets, and sets out specific actions and interventions to meet these targets. Under Core Indicator 7.1.1, all Producers are required to develop and implement a CIP before they can be licensed to sell Better Cotton. The CIP is developed by the Producer Unit Manager or Large Farm Manager according to a specified process from BCI.

Corrective Action Plan (CAP)

A Corrective Action Plan is a document completed by the Producer outlining remediation steps for any incidental or systemic non-conformity identified during an assessment. The CAP is completed by the Large Farm Manager or Producer Unit Manager (with support from the Implementing Partner), using a standard template from BCI.

Core Indicators

Core Indicators are a subset of the Better Cotton P&C – v 2.1, which define a globally consistent baseline for more sustainable cotton production. Core Indicators provide the critical first steps in reducing the environmental impact of cotton and improving livelihoods among cotton farming communities. To receive a licence to sell Better Cotton, a Producer must meet all Core Indicators.

Field Facilitator (FF)

Field Facilitators are field-based staff (typically employed by the IP or Local Partner) who engage directly with farmers in Producer Units. Field Facilitators work closely with farmers to assess baseline practices and deliver training, awareness-raising activities, and other interventions (i.e. demo plots). Field Facilitators also assist with collecting farm-level data and monitoring farmer awareness and practice adoption.

Implementing Partner (IP)

BCI's Implementing Partners are organisations with local expertise who oversee the set-up and management of Producer Units under BCI's assurance model. Implementing Partners assume full responsibility for project delivery at the field level, including establishing the management structure of Producer Units, recruiting and training Producer Unit Managers/Field Facilitators, and providing Producer Units with ongoing oversight and support, including regular field-level engagement.

Large Farm (LF)

Under the BCI assurance model, a Large Farm is defined as a farmer who has a farm size above 200 ha of cotton, and either uses mechanized production, or is structurally dependent on permanent hired labour. Some Large Farms participate with BCI on an individual basis, while others are engaged through a Large Farm Group Assurance model (refer to [Annex B](#)).

Learning Group (LG)

A Learning Group is a group of BCI Farmers who gather together to participate in training and learning activities on more sustainable production practices. All smallholder Producer Units are divided into Learning Groups of approximately 35 farmers, managed by a Field Facilitator to help enable learning. Typically, each Field Facilitator in a smallholder Producer Unit will work with about 10 Learning Groups, or 350 farmers at a maximum.

Licensing Date

The Licensing date is the seasonal date at which the administrative process of licensing is conducted for any Producer with an active licence. This includes issuing Annual Authorised Volume (AAV) codes or updating volume inventories in the Better Cotton Platform, so that buyers of Better Cotton can enter their purchases into the Better Cotton Platform and receive Better Cotton Claim Units (BCCUs) to pass through the supply chain. The Licensing date is determined on a country or regional basis and is typically around the start of harvest.

New Producer Unit (PU)

A new Producer Unit (PU) refers to a group of farmers being organised to participate in the BCI programme for the first time. New PUs are required to fulfil specific requirements under the set-up phase before they are eligible to be assessed for licensing. Existing PUs that undergo changes to the farmer composition or management system (i.e. new PU Manager, restructured PU, or change in IP management) are not considered new PUs under this definition¹. Existing PUs where more than 33% of farmers are new for a given season are not considered new PUs; however, they receive a Surveillance Assessment to maintain the licence.

Producer

The term Producer in the context of the Better Cotton Standard System refers to either an individual Large Farm or a Producer Unit (group) of Smallholders or Medium Farms. Licences to sell Better Cotton are administered at the Producer level.

Producer Unit (PU)

A Producer Unit is a group of Smallholders or Medium Farms who participate in the BCI programme through a group assurance model. Each PU is overseen by a dedicated PU Manager, who is responsible for implementing an internal management system to support, train, and monitor farmers across the PU. The size of a PU depends on local circumstances, although the optimal size is between 3,500 to 4,000 farmers for Smallholders and around 100 farmers for a Medium Farm PU. Farmers in a Smallholder PU are further divided into Learning Groups (LGs).

Results Indicator (RI) reporting

Results Indicator (RI) reporting is the annual collection of environmental, economic, and social data from a representative sample of Smallholder farmers, and from all Medium and Large Farms. Results Indicators quantitatively measure differences between licensed BCI Farmers and other farmers in the same geographic area who are not participating in the BCI Programme. RI reporting is fully integrated into the assurance model as a licensing requirement to ensure that sustainability improvements are adequately measured everywhere Better Cotton is produced.

¹ An IP can decide to voluntarily put an existing PU that undergoes structural changes into a set-up phase in order to focus on strengthening performance before being assessed (or reassessed) for licensing

1 Introduction

About the BCI Assurance Model

The BCI assurance model is a critical component of the Better Cotton Standard System, which aims to improve livelihoods and economic development in cotton-producing areas and reduce the environmental impact of cotton production. The assurance model provides a roadmap for participating [Producers](#) to progress from baseline performance, to meeting the BCI [Core Indicators](#), and eventually achieving long-term improvement goals.

The main objectives of the assurance model are to:

1. Verify that cotton Producers have met the Core Indicators of the BCI Principles and Criteria before they are licensed to sell [Better Cotton](#)
2. Provide a framework to ensure that Better Cotton Producers – once licensed – continue to make progress against their continuous improvement priorities and receive adequate capacity building support
3. Create channels for ongoing learning, through sharing information back to Producers (and Implementing Partners, if applicable) to identify improvement opportunities or compliance gaps
4. Measure the sustainability performance of Better Cotton Producers, and overall programme impacts, through regular collection of field-level ([Results Indicator](#)) data

BCI's approach to assurance is unique from many other standard systems in two regards. First, it aims to balance credibility with scalability and cost-effectiveness, through combining third-party verifier assessments with other types of assessments. BCI's approach combines third-party visits with licensing assessments by BCI Country Teams, support visits by [Implementing Partners](#) (IPs), and regular self-assessments by Producers themselves.

Second, the BCI assurance model puts a strong emphasis on capacity building and continuous improvement. Producers are required to make ongoing sustainability improvements in order to maintain their licence, and assessments focus not only on compliance but also on identifying areas where further support or capacity building is needed.

Producers Under the BCI Assurance Model

Under the Better Cotton Standard System, farms are differentiated into three categories based on the production methods and workforces they use:

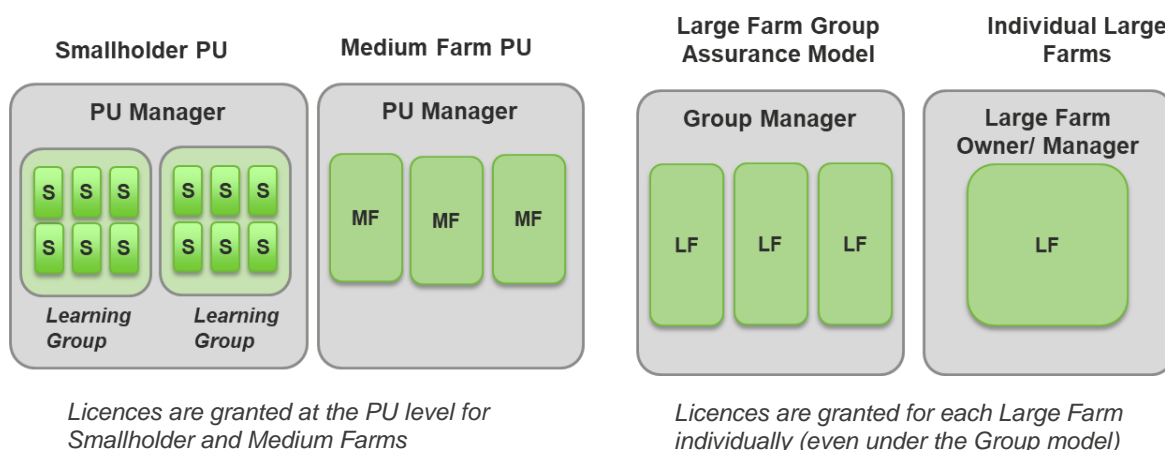
- Smallholders (SH): Farmers who are not structurally dependent on permanent hired labour, and whose farm size does not exceed 20 ha of cotton.
- Medium Farms (MF): Farmers who are structurally dependent on permanent hired labour, and whose farm size is between 20 to 200 ha of cotton
- Large Farms (LF): Farmers who have a farm size above 200 ha of cotton, and either have mechanised production, or are structurally dependent on permanent hired labour

Smallholders and Medium Farms are grouped into [Producer Units](#) (PUs) and are licensed to sell Better Cotton at the PU level. The size of a PU depends on local circumstances, although the optimal size is between 3,500 to 4,000 farmers for Smallholders and around 100 farmers per Medium Farm PU. Farmers in a Smallholder PU are further divided into [Learning Groups](#) (LGs) of approximately 35 farmers (with a Lead Farmer in each one) managed by a [Field Facilitator](#) (FF) to help facilitate learning. Typically, each FF in a Smallholder PU will work with about 10 Learning Groups, or 350 farmers at a maximum. This helps to ensure the FF can have regular contact and visits with each farmer.

Some Large Farms participate with BCI on an individual basis, while others are engaged through a Large Farm Group Assurance model.² Under the Group Assurance model, farms join together with other local growers under the guidance of a designated Group Manager. In both cases, Large Farms are licensed to sell Better Cotton on an individual farm basis.

The term 'Producer' in the context of the Better Cotton Standard System therefore refers to either an individual Large Farm or a Producer Unit of Smallholders or Medium Farms.

Figure 1: Producers under the Better Cotton Standard System



Supporting Documents

Supporting documents, including assessment field books and reporting templates, assessment guidance tools, approval procedures for verifiers, and the BCI appeals process, are available on the [assurance page](#) of the BCI website.

Stakeholder Roles

The roles of key stakeholders in the BCI assurance model are set out below.

Stakeholder	Role in Assurance Model
Farmer	<p>Farmers categorised as Smallholders and Medium Farms participate in trainings and awareness-raising activities organised by the Producer Unit. Farmers are expected to apply learnings in order to adopt more sustainable farming practices. Farmers are also responsible for maintaining farm level data on inputs and outputs, to enable the PU to track progress and understand impacts.</p> <p>Farmers categorised as Large Farms are responsible for ensuring they meet the Core Indicators before achieving a licence to sell Better Cotton. This includes developing and implementing a continuous improvement plan that prioritises areas for sustainability improvements and submitting annual Results Indicator data.</p>

² This model was introduced formally in 2018 and is currently applicable only in the United States, although may be expanded to other regions in the future. More details around the Group Assurance Model can be found in [Annex B](#).

Stakeholder	Role in Assurance Model
Field Facilitator (FF) <i>[PUs only]</i>	Field Facilitators are field-based staff (typically employed by the IP or Local Partner) who engage directly with farmers in Producer Units. Field Facilitators work closely with farmers to assess baseline practices and deliver training, awareness-raising activities, and other interventions (i.e. demo plots). Field Facilitators also assist with collecting farm-level data and monitoring farmer awareness and practice adoption.
Producer Unit (PU) Manager <i>[PUs only]</i>	The Producer Unit (PU) Manager is the main individual responsible for the PU's overall organisation and performance. The PU Manager identifies areas where farmers require improvement or support and supports Field Facilitators in working with farmers and workers. The PU Manager is responsible for the following key areas (with support from the IP): <ul style="list-style-type: none"> ➤ Development of training material and training plans ➤ Building the capacity of Field Facilitators ➤ Development and implementation of the Continuous Improvement Plan (CIP) (with other stakeholder engagement, as per the CIP planning process) ➤ Development and implementation of an internal management system (IMS); for monitoring training efficacy, practice adoption, and data collection ➤ Completion of annual internal assessment and self-assessment ➤ Development and implementation of Corrective Action Plans
Implementing Partner (IP) <i>[PUs only]</i>	BCI's Implementing Partners are organisations with local expertise who oversee the set-up and management of Producer Units under BCI's assurance model. Implementing Partners assume full responsibility for project delivery at the field level, including establishing the management structure of Producer Units, recruiting and training Producer Unit Managers/Field Facilitators, and providing Producer Units with ongoing oversight and support through field-level engagement. Implementing Partner representatives are also responsible for supporting and building the capacity of PU Managers and Field Facilitators, supporting PUs in the development of their Continuous Improvement Plan, and monitoring PU performance through Readiness Checks and Support Visits.
Local Partner <i>[PUs only]</i>	Some IPs may delegate specific field-level implementation activities to Local Partners. Local Partners are typically entities with a strong field presence and technical expertise relevant to the geographical area. Local Partners are overseen by the associated IP, and the IP is accountable for ensuring the efficacy of the Local Partner through ongoing monitoring and engagement.
BCI Country Team	Each BCI Country Team has Programme Officers and Coordinators responsible for the implementation of activities and protocols in the assurance model. ³ BCI Country Teams conduct Licensing and Surveillance Assessments, maintain communication with Implementing Partners and PU Managers, and support BCI Assurance Manager(s) with licensing recommendations.
Third-party Verifiers (3PV)	Third-party verifiers (3PVs) are independent parties approved by BCI to carry out Licensing and Surveillance Assessments in specific countries. 3PVs must complete training and approval requirements defined by BCI.

³ In countries where BCI operates through a strategic partner, Programme Officers/Coordinators are employed by the strategic partner.

Stakeholder	Role in Assurance Model
Assurance Managers	BCI Assurance Managers are responsible for the planning, execution and reporting of the Better Cotton assurance model in all countries. They oversee the operational delivery of the BCI Global Assurance Team, consisting of Programme Officers and Coordinators within Country Teams. Assurance Managers are responsible for all final Producer licensing decisions (based on recommendations and evidence provided by third-party verifiers or BCI Country Teams). Assurance Managers also oversee the Terms of Reference and membership for the Appeals Committee and coordinate the process for any appeals against a licensing decision.
Appeals Committee	The Appeals Committee is responsible for providing objective, consistent, and evidence-based decisions for Producers appealing a BCI licensing decision. The Appeals Committee is composed of BCI Country Managers and selected third-party verifiers or independent consultants. Members of the committee are selected based on local knowledge and availability. Refer to the Appeals Procedure for more information.

Overview of Licensing Requirements

To be licensed to sell Better Cotton, Producers must fulfil the following requirements:

1. Comply with all with Core Indicators of the BCI Principles and Criteria
2. Submit an annual self-assessment survey on Producer practices
3. Submit annual [Results Indicators \(RI\) reporting](#) data on field-level practices
4. Demonstrate continuous improvement through achieving more sustainable practices over time

The fixed nature of the Core Indicators ensures that all licensed Producers reach a globally consistent baseline in sustainable cotton production. At the same time, the focus on continuous improvement ensures that all Producers, regardless of their initial level, commit to adopting even more sustainable practices over time. Regular RI reporting enables BCI and its partners to monitor and learn from field-level results.

Better Cotton Principles and Criteria- Core Indicators

The [BCI Principles and Criteria](#) (P&C) include 7 Principles covering the most significant global sustainability issues associated with cotton production:

- 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 the quality of fibre
- Principle 6: BCI Farmers promote decent work
- Principle 7: BCI Farmers operate an effective management system

The 7 Better Cotton Principles are further defined through 42 criteria and a subset of 164 indicators. Criteria are applicable to all Producer categories, while indicators are differentiated for Smallholders, Medium Farms, and Large Farms, and designated as either Core or Improvement:

- **Core Indicators:** Producers must comply with all Core Indicators (applicable for their Producer category) to be licensed to sell Better Cotton.
- **Improvement Indicators:** Producers do not need to comply with Improvement Indicators to be licensed to sell Better Cotton. Improvement Indicators are designed to incentivise and measure continuous improvement across all areas of sustainable production.

The Core Indicators provide the critical first steps in reducing the environmental impact of cotton production and improving livelihoods among cotton farming communities. Improvement Indicators can be used by Producers to help guide and measure their sustainability improvements in key areas.

Results Indicators (RI) Reporting

In addition to complying with the Core Indicators from the *BCI Principles and Criteria*, all Producers must report farm-level data on inputs, outputs and practices, as specified in the BCI document *Working with Results Indicators*. This ensures that sustainability improvements are measured everywhere BCI projects are implemented. It is important to emphasise that this requirement focuses on the reporting of data, not the content of that data. The content of Results Indicator (RI) data and any trends/impacts revealed are used for learning processes only and are not a basis for disqualifying Producers or cancelling licences. RI data must be collected and reported every season in order to maintain a licence. Reporting is done at Producer Unit level in the case of smallholders or at individual farm level in the case of Medium and Large Farms.

Table 1: Overview of Results Indicator Reporting

Farmer category	Indicators to be reported	Sampling approach	Comparison data
Smallholders/ Medium Farms	<ol style="list-style-type: none"> 1. Pesticide use 2. Fertiliser use 3. Water use 4. Yield 5. Profitability 6. Eliminating child labour through partnerships 7. Improving understanding and awareness of child labour issues 8. Inclusion of women farmers and workers in training 	<p><u>Smallholders:</u> Representative sampling-based approach at Producer Unit level</p> <p><u>Medium Farms:</u> 100% data collected from all farms</p>	Yes
Large Farms	<ol style="list-style-type: none"> 1. Pesticide use 2. Fertiliser use 3. Water use 4. Yield 	100% data collected from all farms	No

Continuous Improvement

The Better Cotton Standard System approaches more sustainable cotton production as a journey of continuous improvement. Producers are required under Core Indicator 7.1.1⁴ to demonstrate ongoing sustainability improvements through the development and implementation of a Continuous Improvement Plan (CIP). The assurance model supports

⁴ 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.

this process through providing Producers with regular assessment and feedback, ensuring that PUs and LFs demonstrate increasingly higher levels of sustainable cotton farming over time. Refer to [12.1 Continuous Improvement](#) for more detail.

Overview of Assurance Requirements

To verify that Producers meet the Core Indicators and continue to make continuous improvements in sustainability, the BCI assurance model uses a combination of self-assessment, external (licensing) assessments, and support visits by Implementing Partners (for PUs only).

Table 2 below summarises the assurance requirements for each Producer type. Note that specific requirements for the Large Farm Group Assurance model are found in [Annex B](#).

Table 2: Assurance Requirements by Producer Type

Producer type	Requirements to receive a licence (for new PUs/ LFs)	Requirements during active licence period	Requirements for licence renewal
PU (Smallholder or Medium Farms)	<ul style="list-style-type: none"> ➤ Complete all PU 'set-up' expectations (See 4. Set-Up of New Producer Units) ➤ Complete self-assessment ➤ Readiness Check carried out and IP decides the PU is 'recommended for licensing' ➤ Licensing Assessment by 3PV or BCI team verifies compliance with all Core Indicators 	<ul style="list-style-type: none"> ➤ Correct any incidental non-conformities from Licensing Assessment (if relevant) ➤ Complete annual self-assessment ➤ Submit annual Results Indicator data as required ➤ PU Support Visit in Year 2 or 3 of active licence ➤ [For sample of PUs only] receive Surveillance Assessment in Year 2 or 3 	<ul style="list-style-type: none"> ➤ Licensing Assessment by 3PV or BCI team verifies compliance with all Core Indicators, including progress against continuous improvement priorities
Large Farm (individual)	<ul style="list-style-type: none"> ➤ Complete self-assessment ➤ Licensing Assessment by 3PV verifies compliance with all Core Indicators 	<ul style="list-style-type: none"> ➤ Correct any incidental non-conformities from Licensing Assessment (if relevant) ➤ Submit annual Results Indicator data ➤ Complete annual self-assessment 	<ul style="list-style-type: none"> ➤ Licensing Assessment by 3PV verifies compliance with all Core Indicators, including progress against continuous improvement priorities

2 Summary of Large Farm Requirements

This section covers individually licensed Large Farms. Refer to [Annex B](#) for more information on Large Farms under the Group Assurance Model.

2.1 Initial Licensing

- 2.1.1 Individual Large Farms that wish to participate in the Better Cotton programme register their participation with the local BCI Country Team by the end of sowing deadline.⁵
- 2.1.2 The Large Farm first completes an online self-assessment survey evaluating its performance against the Core Indicators (including the Continuous Improvement Planning requirements).
- 2.1.3 After the self-assessment is complete, the Large Farm commissions a Licensing Assessment⁶ directly with an approved third-party verifier.
- 2.1.4 The outcome of the Licensing Assessment is reviewed by the BCI Assurance Managers, together with supporting evidence.
 - a) If the Licensing Assessment and Assurance Manager review confirms the Large Farm meets all Core Indicators, the Large Farm receives a 3-year licence to sell Better Cotton
 - b) If any incidental non-conformities are identified, the Large Farm is required to complete a [Corrective Action Plan](#) (CAP) within ten working days and to close the incidental non-conformities within six months of the assessment date (see [17 Non-conformities and Corrective Actions](#)).
 - c) If any systemic non-conformities are identified, the licence is denied, and the Large Farm will be eligible for another Licensing Assessment the following season.

The Large Farm is still required to complete a CAP to identify corrective actions for any systemic non-conformities, even if the licence is denied.

2.2 Active Licence Period

- 2.2.1 During the 3-year active licence period, Large Farms are expected to fulfil annual requirements (see [14 Active Licence Period](#)) to maintain the licence.
- 2.2.2 If the Large Farm does not meet the annual requirements, the licence is cancelled (see [16.1 Licence cancellation](#))

2.3 Licence renewal

- 2.3.1 At the end of the 3-year active licence period, the Large Farm is required to commission another Licensing Assessment with an approved third-party verifier:⁷
 - d) The assessment evaluates whether the Large Farm continues to meet all Core Indicators and also assesses whether the Large Farm is progressing against the priorities outlined in its Continuous Improvement Plan.
- 2.3.2 The outcome of the Licensing Assessment is reviewed by the BCI Assurance Managers (together with supporting evidence).

⁵ These seasonal deadlines for assurance activities are set by country and harvest wave

⁶ Third-party verification for Large Farms follows the same process outlined for Producer Units in section 8

⁷ Typically, if a LF is licensed in its first year of participation, the assessment to renew the licence would be carried out in its fourth year of participation, before the [licensing date](#)

- 2.3.3 If the Licensing Assessment and Assurance Manager review confirms the Large Farm meets all Core Indicators, the licence is renewed for another 3 years.
- 2.3.4 If any incidental non-conformities are identified, the Large Farm is required to complete a corrective action plan within two weeks and to close the incidental non-conformities within six months of the assessment date (see [17 Non-conformities and Corrective Actions](#)).
- 2.3.5 If any systemic non-conformities are identified, the licence is denied, and the PU will be eligible for another Licensing Assessment the following season.

3 Summary of Producer Unit Requirements

The assurance process for Producer Units (PUs) in the BCI programme is similar to that for Large Farms; however, with a few key differences. PUs typically spend their first season in a set-up phase before being recommended for licensing. They also require a Readiness Check by the IP before receiving a Licensing Assessment (carried out by either BCI or a third-party verifier). PUs also receive a Support Visit by the IP during the active licence period and may also receive a Surveillance Assessment (by BCI or a 3PV).

This section provides a summary of requirements at each stage of the assurance process; more detail can be found in later sections of the Assurance Manual

3.1 New PUs Entering the BCI Programme

- 3.1.1 A **new PU** generally spends its first season in a 'set-up phase' focused on building its internal management system, identifying baseline farming practices, and training farmers on key improvement areas (see [4.1 Set-Up Phase](#))
- 3.1.2 During the set-up phase, the PU completes an internal assessment and online self-assessment but does not yet receive a Licensing Assessment.

Refer to [7 Readiness Checks](#) for more detail on the Readiness Check process

3.2 Readiness Check and Recommendation for Licensing

- 3.2.1 Once a PU has established its internal management system, trained field staff and farmers, and has made progress to comply with all Core Indicators, the IP carries out a field-based Readiness Check.
- 3.2.2 If the IP determines that the PU is fully compliant with all Core Indicators by the end of sowing, the IP can recommend the PU to be assessed for licensing.
- 3.2.3 If more work is needed to close gaps against Core Indicators, the IP is responsible for following up with the PU Manager to ensure appropriate corrective actions are put in place before recommending the PU for licensing.

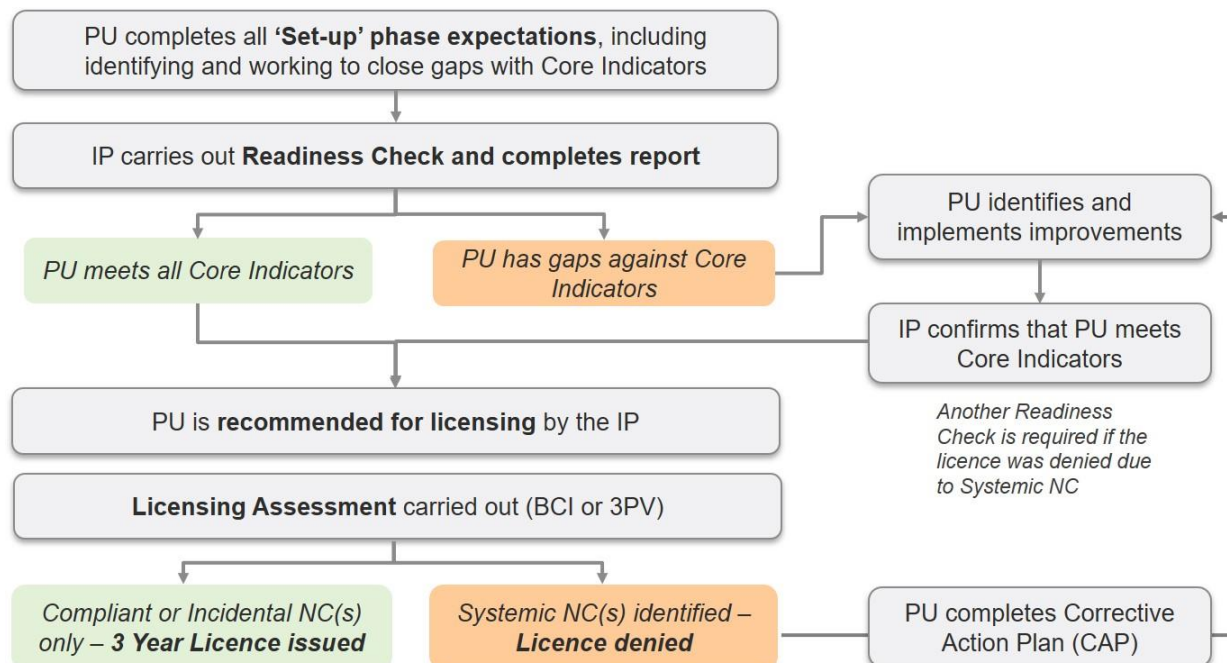
Refer to [7 Readiness Checks](#) for more detail on the Readiness Check process

3.3 Initial licensing

- 3.3.1 After a PU is recommended for licensing by the IP, the PU receives a Licensing Assessment by either an approved third-party verifier or a qualified BCI staff member (see [8 Licensing Assessments](#)).
- 3.3.2 The Licensing Assessment evaluates conformity with the Core Indicators and forms the basis for the licensing decision, which is reviewed and confirmed by the BCI Assurance Managers.
- 3.3.3 If the PU is found fully compliant with all Core Indicators or partially compliant (i.e. incidental non-conformities but no systemic non-conformities), then the PU receives a 3-year licence to sell Better Cotton.

Refer to [17 Non-conformities and Corrective Actions](#) for more detail on non-conformity grading and follow-up.

Figure 2: Process to Receive Initial Licence (PUs only)



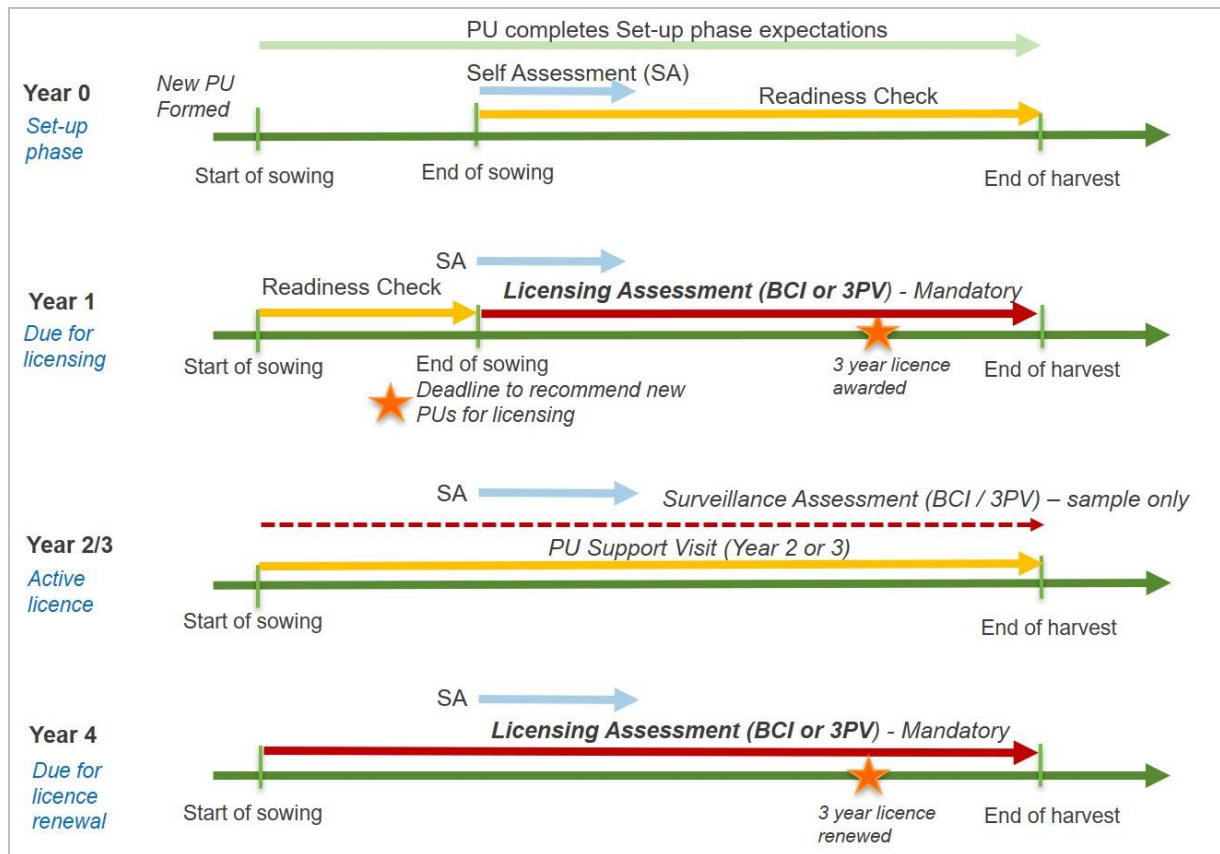
3.4 Active Licence Period

- 3.4.1 During the 3-year active licence period, PUs are expected to fulfil annual requirements (see [14 Active Licence Period](#)) to maintain the licence.
- 3.4.2 If the PU does not meet the annual requirements, the licence is cancelled (see [16 Licence Cancellation](#))
- 3.4.3 During the second or third year of the active licence period, all PUs receive a PU Support Visit by the IP, and a sample of PUs also receive a Surveillance Assessment (by BCI or a 3PV) during the second or third year of their active licence.

3.5 Licence Renewal

- 3.5.1 At the end of the licence period, when due for licensing again, PUs undergo an additional Licensing Assessment (by BCI staff or a third-party verifier) for the licence to be renewed.

Figure 3: Assurance Cycle for PUs (Years 0-4)⁸



⁸ In cases where a new PU applies for a variation to be recommended for licensing in the first season (see [4.2 Timing of the Set-Up Phase](#)) the PU is expected to have completed all set-up phase activities before the end of sowing deadline when the variation is requested.

4 Set-Up of New Producer Units

When new Producer Units (PUs) are formed under the BCI assurance model, they are generally expected to spend their first season⁹ focusing on recruiting and training field staff, engaging with farmers, and implementing the internal management system. This 'set-up' phase helps new PUs build a strong foundation and ensures that future efforts can deliver training and support to farmers in the most relevant areas. During the set-up phase, the focus should be on working closely with farmers to identify baseline practices and gaps in meeting the Core Indicators, developing training materials and demonstration plots, and carrying out farmer training/support visits.

4.1 Set-Up Phase

4.1.1 Before being assessed for licensing, **new PUs** are expected to carry out the following activities as part of their initial set-up phase:

- a) Complete an internal assessment to understand current baseline farming practices within the PU (see [6.2 Internal Assessment](#))
- b) Complete the self-assessment (version for new PUs)
- c) Identify gaps in meeting the Core Indicators and develop/implement [Corrective Action Plans](#)
- d) Develop training materials and carry out cascade training to Field Facilitators and farmers/workers
- e) Based on a participatory approach with field staff and farmers, develop the natural resource plans and time-bound plans required under the BCI Principles and Criteria (i.e. water stewardship plan, biodiversity plan and mapping, child labour prevention, etc.)
- f) Develop the Continuous Improvement Plan (CIP), according to the BCI CIP Process
- g) Submit Results Indicator (RI) reporting data for the specified sample of farmers
- h) Undergo a Readiness Check carried out by the Implementing Partner (IP) and fully address any corrective actions identified during this visit (see [7.3 Readiness Check Outcomes](#))

Additional guidance on expectations for new PUs and preparation for licensing can be found on the [assurance page](#) of the BCI website.

4.2 Timing of the Set-Up Phase

4.2.1 **New PUs** are generally expected to spend their first season in a set-up phase, without being assessed for licensing.

4.2.2 In specific cases, a new PU can apply for a variation to have a Licensing Assessment in its first season. A variation can be requested in the following cases:

- a) The participating farmers are already covered by an effective internal management system such as that of another standard or certification system, or
- b) The PU has been established well in advance of the current crop season; at the very latest:
 - i. The PU Manager and all Field Facilitators have been hired and trained by the start of sowing, and
 - ii. The internal assessment on the PU has been completed by the PU Manager, by two weeks after start of sowing (at the latest).

⁹ Defined for the purposes of the BCI assurance model as pre-sowing activities (i.e. soil preparation) through to end of harvest for one crop season

New PUs that are recommended for licensing in their first season are expected to have completed all set-up phase expectations and to be fully compliant with Core Indicators before being recommended for licensing. The starting point for determining whether the PU is prepared for licensing in the first season is the internal assessment conducted by the PU Manager (see [6.2 Internal Assessment](#)) The internal assessment is a requirement for all PUs, but it is expected to be completed early in the season in cases where a new PU submits a request for variation.

These variations can apply for example where PUs have been established well in advance of the growing season; e.g. during the end of the previous cotton season.

- 4.2.3 A variation to have a PU assessed for licensing in its first season must be submitted by the end of sowing deadline to the BCI Assurance Managers (see [18.1 Variations Process](#)):
- a) PUs that are recommended for licensing in the first season must still have a Readiness Check completed by the end of sowing deadline;
 - b) The completed Readiness Check report is submitted to BCI as part of the variation request.

5 Overview of Assessment Types

The BCI assurance model includes different forms of assessment to support Producers in making improvements and to verify their compliance with Core Indicators.

Table 3: Overview of Assessment Types

Assessment Type	Conducted by	Key Objective	Frequency and Timing
Self-assessment (based on internal assessment findings for PUs only)	PU/LF Manager	<i>New Producers (first season):</i> Assess baseline performance/ current practices; identify improvement priorities <i>Existing Producers:</i> Monitor continued compliance with Core Indicators; track progress on continuous improvement	Annually by each PU and LF <i>Timing:</i> Issued End of Sowing Deadline to submit: 4 weeks after the End of Sowing
Readiness Check <i>[PUs only]</i>	Trained IP Staff Member	Assess whether the PU is compliant with Core Indicators and for licensing; identify areas for further support/capacity building	Before a new PU is assessed for licensing; typically, in the first or second season <i>Timing:</i> from start of sowing to end of harvest during the initial set-up season or during the sowing period of the second season.
Licensing Assessment	BCI/ Third-party verifier (for PUs) Third-party verifier (for LFs)	<i>For new licences:</i> confirm the Producer meets all Core Indicators, including development of an initial Continuous Improvement Plan <i>For licence renewal:</i> confirm the Producer continues to meet the Core Indicators and verify that Continuous Improvement Plan is being implemented	Prior to initial licence and at point of licence renewal; at least every 3-years <i>Timing:</i> from start of sowing to end of harvest
PU Support Visit <i>[PUs only]</i>	Trained IP Staff Member	Monitor continuous improvement and identify areas where the PU needs additional support/capacity building	At least once during the second or third year of an active licence <i>Timing:</i> from start of sowing to end of harvest
Surveillance Assessment <i>[PUs only]</i>	BCI/ Third-party Verifier	Ensure ongoing compliance with Core Indicators, including demonstrated progress against the Continuous Improvement Plan	Once per licence period if applicable- minimum 5% licence holders covered annually based on risk <i>Timing:</i> from start of sowing to end of harvest

6 Self-Assessment and Internal Assessment

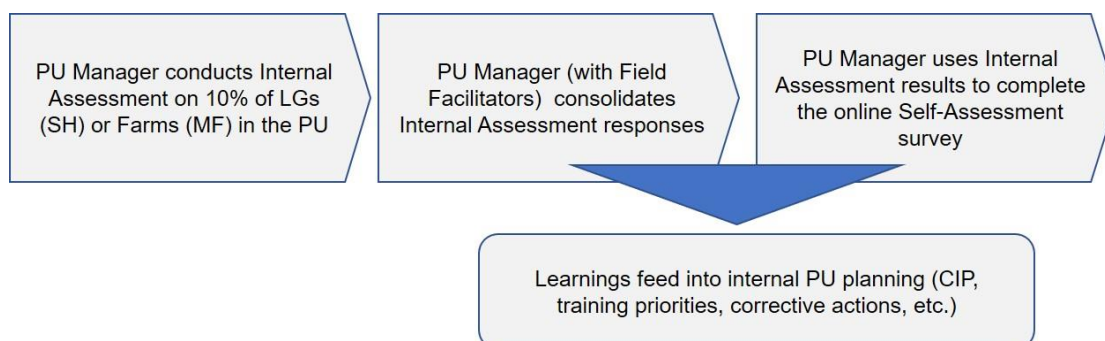
6.1 Overview

- 6.1.1 All Producers are required to complete an annual self-assessment survey in order to receive or maintain a licence:
- Self-assessment is completed individually for each Large Farm.
 - Self-assessment is completed at the Producer Unit (PU) level for each Smallholder and Medium Farm PU, based on the results of an internal assessment.
- 6.1.2 The objectives of the self-assessment are to:
- Document baseline performance/ current farming practices (for new PUs only)
 - Highlight critical gaps where more work is needed to fully comply with Core Indicators
 - Measure progress against the Continuous Improvement Plan (CIP) and identify any adjustments or changes needed
 - Identify year-over-year improvements in farmer understanding and adoption of more sustainable practices, along with barriers or challenges
 - Assess areas where farmer training or interventions need to be revised to improve effectiveness
- 6.1.3 The results of the self-assessment are not directly linked to licensing; they are used instead to help the PU or Large Farm (LF) Manager identify improvement areas.
- Self-assessment results may also used by third-party verifiers (3PVs), Implementing Partners (IPs), or BCI teams to help prepare for an assessment or monitoring visit.

PU's in their first season complete a separate self-assessment version with a greater focus on baseline practices and setting up the internal management system.

6.2 Internal Assessment (PUs only)

- 6.2.1 Before completing the self-assessment at PU level, the PU Manager and Field Facilitators carry out an internal assessment to gather feedback from a representative sample of farmers each season:



- 6.2.2 The internal assessment should cover (via surveys, focus groups, or consultation) at least 10% of the LGs (for a Smallholder PU) or 10% of Farms (for a Medium Farm PU).

PU's are recommended to include even more LGs or Farms where possible—10% of LGs (Smallholders) or Medium Farms is a minimum expectation.

- 6.2.3 The internal assessment helps to identify current practices used by farmers and assesses various elements of training and practice adoption:
 - a) During the set-up phase, internal assessment focuses on baseline (existing) farmer practices, which helps identify improvement priorities.
 - b) After a PU is licensed, the focus of internal assessment shifts to assessing levels of farmer understanding and adoption of the practices promoted through training.
- 6.2.4 A standard reporting format for internal assessment reporting can be found on the [assurance page](#) of the BCI website – this format is optional for PUs.
- 6.2.5 Internal assessment reports are maintained by the PU Manager and do not need to be submitted to BCI; however, they may be reviewed by BCI team members or third-party verifiers during assessments.

6.3 Self-Assessment Format and Timing

- 6.3.1 The self-assessment is completed by the PU Manager or LF Manager via an online survey tool distributed by the BCI Country Team.
- 6.3.2 For PUs, the PU Manager should use the results of the internal assessment as a main source to complete the self-assessment; however, he/she can also use other information from the previous season, such as records on farmer awareness or practice adoption.
- 6.3.3 Although self-assessment can be a useful reference during assurance checks, Licensing or Surveillance Assessments can still be carried out on a Producer even if the self-assessment has not yet been submitted.
- 6.3.4 Deadlines for self-assessment are generally set by country and harvest wave as follows:

Self-assessment issued	End of sowing
Deadline to submit completed self-assessment	4 weeks after end of sowing

- 6.3.5 If a Producer does not submit a completed self-assessment survey of admissible quality by the deadline, the Producer’s active licence will be cancelled for one season (or if unlicensed, the Producer will remain unlicensed for that season).

See [16.1 Licence Cancellation](#) for more information on cancelled licences. In extenuating circumstances an extension request for more time to complete the self-assessment can be requested, please refer to [18.1 Variations and Extensions](#)

7 Readiness Checks (PUs only)

7.1 Overview

- 7.1.1 The Readiness Check uses the unique role of Implementing Partners (IPs) as expert organisations with an ongoing field presence to ensure [new PUs](#) meet the Core Indicators prior to being assessed for licensing.
- 7.1.2 The objectives of the Readiness Check are to:
 - a) Assess whether a new PU fully meets the Core Indicators;

- b) Identify any gaps against Core Indicators and develop corrective actions (together with the PU Manager); monitor the PU to ensure these corrective actions are implemented and effective;
- c) Evaluate the strength of the PU's capacity building programme and identify improvement areas (e.g. related to quality of training, knowledge of Field Facilitators, etc.).

Together, the outcome of these points will inform the IP's decision on whether a PU is ready to be 'recommended for licensing.'

- 7.1.3 Readiness Checks can be conducted by any experienced member of the IP organisation who has completed relevant training.

The job title of the specific individual(s) within an IP organisation who meet these requirements may vary. BCI provides training to IP representatives on how to conduct the Readiness Check. IP representatives who have experience with the BCI programme and have undergone training on the Readiness Check process can train other IP staff members in order to build up a pool of eligible assessors within the organisation.

- 7.1.4 Readiness Checks cannot be conducted by the PU Manager (or another staff member) of the same PU that is being assessed.

7.2 Format and timing

- 7.2.1 Readiness Checks are field-based visits, in which the IP Representative spends significant time visiting farmers and observing the Field Facilitators and PU Manager in their daily roles.

- 7.2.2 Readiness Checks should typically last at least two full days for a Smallholder PU and 1.5 days for a Medium Farm PU.

- 7.2.3 Readiness Checks include the following elements:

- a) A meeting with the PU Manager and Field Facilitators to understand progress and identify key challenges and action plans;
- b) Individual interviews with at least 5 farmers from 3 different Learning Groups for Smallholders (15 farmers minimum), or 3 farmers for Medium Farms;
- c) Field observations at individual farms (minimum of 5 farms, but more farm visits are recommended);
- d) Worker interviews (whenever possible);
- e) Observing the PU Manager and Field Facilitators in their daily roles; for example, watching training sessions, farmer focus groups, or shadowing Field Facilitators on individual farmer visits;
- f) Individual interviews with the PU Manager and Field Facilitators to understand knowledge strengths and areas for improvement;
- g) A review of essential PU documents, including internal assessments, management plans, the continuous improvement plan, and training schedules and materials (for PU staff and LGs/farmers); and
- h) A closing meeting with the PU Manager and Field Facilitators to discuss findings, corrective actions, and any next steps.

- 7.2.4 Readiness Checks can be carried out any time from sowing to harvest during the initial set-up season or any time during the sowing period of the PU's second season.

- 7.2.5 IPs must submit a list of all PUs that are recommended for licensing to BCI Country Teams at the latest by the end of sowing deadline.

If a PU applies for a variation to be assessed for licensing in its initial season, the Readiness Check would have to occur during sowing of this initial season (see [4.2 Timing of the Set-Up Phase](#)).

7.3 Readiness Check Outcomes

7.3.1 The findings of the Readiness Check are documented and shared back to the PU Manager in the Readiness Check report

- a) If the PU does not yet fully meet all Core Indicators, the IP Representative (together with the PU Manager) completes a corrective action plan, as specified in the Readiness Check Reporting Template (available on the [assurance page](#) of the BCI website).
- b) The Readiness Check report (and corrective action plan, if applicable) are to be shared with the PU Manager within 3 weeks of the visit taking place.

7.3.2 The IP is responsible for monitoring progress and verifying implementation of corrective actions if applicable.

This is ideally completed through an additional Readiness Check, or if necessary, through the remote verification of evidence. Evidence supporting non-conformity closure does not need to be submitted to BCI but should be available at IP level and may be requested as part of external assessment activities.

7.3.3 Based on the outcome of the Readiness Check and any follow-up monitoring activities, the IP determines whether the PU is ready to be assessed for licensing.

7.3.4 By the end of sowing deadline, the IP is required to submit a list of all new PUs which are 'recommended for licensing' to the BCI Country Team.

The Readiness Check reports for all PUs recommended for licensing can be submitted to BCI on a rolling basis, with all reports received by the End of Sowing deadline. It is the responsibility of the IP to ensure the quality and completeness of Readiness Check reports before they are submitted to BCI.

7.3.5 BCI Country Teams may request improvements or additional information if Readiness Check reports lack enough detail to assess PU performance.

BCI will not formally approve each Readiness Check report. A sample of reports may be reviewed as part of BCI's routine annual assurance review and periodic external oversight activities (see [20.1 Oversight Mechanism](#)).

7.3.6 If the IP determines that a PU is not ready for licensing by the end of sowing deadline, the PU can spend the season in set-up phase and will not receive a Licensing Assessment that season.¹⁰

8 Licensing Assessments

This section applies to both Producer Units and Large Farms. Licensing assessments for PUs can be carried out by either BCI Country Teams or third-party verifiers; while Licensing Assessments for Large Farms are always carried out by third-party verifiers.

8.1 Overview

8.1.1 All Producers must undergo a field-based Licensing Assessment in order to receive or renew a licence.

8.1.2 The purpose of a Licensing Assessment is to:

¹⁰ PUs can spend 1-2 seasons in set-up phase; if additional time is required before they are ready for licensing, a written variation must be requested.

- a) Verify whether the Producer is in conformity with the Core Indicators to inform the final licensing decision made by BCI Assurance Managers;
 - b) Check progress against the Continuous Improvement Plan (CIP) and provide improvement recommendations to the Producer Unit (PU) to support further sustainability improvements;
 - c) If incidental non-conformities are identified, provide the Producer with a non-conformity report to enable the PU/LF Manager to develop a Corrective Action Plan (CAP).
- 8.1.3 Licensing Assessments for Large Farms (LFs) are conducted by an approved third-party verifier (refer to [BCI Approved Third-party Verifiers](#)).¹¹
- 8.1.4 Licensing Assessments for PUs are conducted by either a trained BCI assessor or an approved third-party verifier.¹²
- a) third-party verification constitutes a minimum of 20% of the licensing and surveillance assessments for PUs conducted in a given country per year.

Using a combination of qualified BCI staff and approved third-party verifiers for PUs allows assurance resources to be allocated efficiently and ensures each country has a wide pool of assessors eligible to perform visits. The distribution of assessments between BCI and third-party verifiers is determined on a country basis depending on resource availability and BCI team capacity.

8.2 Format and Timing

- 8.2.1 Licensing Assessments are field-based visits that include a review of the Producer's internal management system as well as field observations and interviews.
- 8.2.2 Each assessment includes the following elements:¹³
- a) Gathering information from local sources (for third-party verification only)
 - b) Management interview
 - c) Farmer interviews
 - d) Worker interviews
 - e) Documentation review
 - f) Visual (field) inspection
 - g) Analysis and reporting

A guidance document for assessments provides more detail on each of these elements, and can be found on the [assurance page](#) of the BCI website.

- 8.2.3 During the assessment process for PUs, a sample of farmers are visited:
- a) For Smallholder PUs, a minimum of 3 Learning Groups are visited and 5 farmers per Learning Group (total of 15 farmers) receive farm visits.
 - b) For Medium Farm PUs, a minimum of 3 farmers receive farm visits.

These are minimum expectations. A greater sample of farmers should be visited whenever possible in order to have better representation of the PU's performance. Additional farmers may also be visited at the assessor's discretion; for example, in order to determine the extent of a potential non-conformity.

¹¹ Refer to the [Stakeholder roles](#) section for more information on the role of country-level Assurance staff and third-party verifiers in the assurance model.

¹² Refer to the [Stakeholder roles](#) section for more information on the role of country-level Assurance staff and third-party verifiers in the assurance model.

¹³ In the case of self-assessment, the 'Assessment Process' is applicable to the Internal Assessment visits that inform the completion of the self-assessment survey. See [6.2 Internal Assessment](#).

- 8.2.4 During the assessment process for LFs, the individual LF receives a site visit from a third-party verifier.
- 8.2.5 Licensing Assessments can take place anytime during the cotton season from start of sowing to end of harvest:
 - a) For new PUs, a Licensing Assessment can only occur after the completion of set-up phase expectations, and after the PU has received a Readiness Check and been 'recommended for licensing' by the IP.
 - b) For licensed Producers, a Licensing Assessment to renew the licence is carried out the same season the licence is expiring.
- 8.2.6 In general Licensing Assessments take place before the [licensing date](#) in each country; however, in extenuating cases, a Licensing Assessment for an active PU may take place after the licensing date (e.g. due to scheduling issues or timing of the crop season).
 - a) In this case, the licence will be renewed and if systemic non-conformities are identified during the assessment, the licence would be cancelled for the following season (see [16.1 Licence Cancellation](#)).

8.3 Outcome of Licensing Assessments

- 8.3.1 During the closing meeting at the end of a Licensing Assessment, the BCI assessor or third-party verifier will discuss and share a short, written summary of key findings with the PU Manager or LF Manager.
 - a) This will include both positive elements of the Producer's performance as well as areas where there are potential gaps against the Core Indicators or further improvements could be made.

This summary of findings should be used as the basis to guide the closing meeting discussion, and a copy will be left with the PU Manager or LF Manager to ensure there is clear communication of assessment findings. No non-conformity gradings should be communicated at this point (as these are subject to Assurance Manager oversight); only fact-based descriptions of potential issues identified.

- 8.3.2 After the visit, the full set of findings are documented using the BCI Assessment Report template, available on the [assurance page](#) of the BCI website.
- 8.3.3 The Licensing Assessment report, summary of key findings, and supporting evidence are shared with BCI Assurance Managers to review and confirm a final licensing decision.
 - a) If compliant with all Core Indicators, the Producer will receive a 3-year licence
 - b) If only incidental non-conformities are identified, the Producer will receive a 3-year licence and is required to carry out the following to maintain the licence:
 - i. Complete and submit a Corrective Action Plan (CAP) within ten working days
 - ii. Demonstrate that corrective actions have been implemented within six months

If either of these requirements are not met, the licence will be cancelled for the following season see [16.1 Licence Cancellation](#).

- c) If any systemic non-conformities are identified, the licence will be denied

- 8.3.4 Once a final licensing decision has been made, the Assessment Report (available on the [assurance page](#) of the BCI website) is shared with the PU Manager or Large Farm.

Reports are generally expected to be completed and shared with the Producer within three weeks of the visit taking place. The Assessment Report also includes a section outlining Improvement Recommendations. These advise the Producer on potential risks or weaknesses observed during the visit as well as opportunities for further development.

The PU or LF Manager is responsible for integrating the feedback provided in the Improvement Recommendations report into the Continuous Improvement Plan

- 8.3.5 If any non-conformities (incidental or systemic) are identified during the assessment, BCI will also share a CAP template with the PU or LF Manager

- a) The PU or LF Manager must complete the CAP and return the BCI Country team within ten working days

Refer to [17 Non-conformities and Corrective Actions](#) for more information on non-conformities and licensing.

- 8.3.6 For new PUs only, if a systemic non-conformity is identified during the first Licensing Assessment, the IP must conduct a Readiness Check to confirm that corrective actions have been effective (and the PU complies with all Core Indicators, before the PU can be recommended again for licensing.

9 PU Support Visits (PUs only)

9.1 Overview

- 9.1.1 All licensed PUs are required to receive a field-based PU Support Visit by the Implementing Partner (IP) in either the second or third year of the active licence period.

These visits are designed to complement – not replace – regular monitoring and field visits by the IP to all the PUs under their management.

- 9.1.2 IPs are responsible for scheduling PU Support Visits and tracking to ensure that each PU receives a visit during the second or third year of the active licence period.

- 9.1.3 The aim of the PU Support Visit is to:

- a) Evaluate the PU's progress against its Continuous Improvement Plan (CIP), identify challenges, and develop solutions (together with the PU Manager and Field Facilitators)
- b) Review the effectiveness of the PU's internal management system and training/awareness raising efforts, and determine if any changes are needed
- c) Verify whether the PU is still fully compliant with the Core Indicators; identify any gaps and agree on corrective actions to address these
- d) Understand where the PU needs additional capacity building support and training (including skills development or training of PU staff as well as for farmers)

- 9.1.4 PU Support Visits can be conducted by any experienced member of the IP organisation who has completed relevant training.

The job title of the specific individual(s) within an IP organisation who meet these requirements may vary. BCI provides training to IP representatives on how to conduct the PU Support Visits. IP Representatives who have experience with the BCI programme and have undergone training on the PU Support Visit process can train other IP staff members in order to build up a pool of eligible assessors within the organisation.

- 9.1.5 PU Support Visits cannot be conducted by the PU Manager (or another staff member) of the same PU that is being assessed.

9.2 Format and timing

- 9.2.1 PU Support Visits are field-based checks that should typically last at least two full days for a Smallholder PU and 1.5 days for a Medium Farm PU.

- 9.2.2 The PU Support Visit should include at a minimum the following elements (others may be included based on the judgement of the IP representative):

- a) A meeting with the PU Manager and Field Facilitators to understand progress and identify key challenges and action plans;
- b) Individual interviews with at least 5 farmers from 3 different Learning Groups for Smallholders (15 farmers minimum), or 3 farmers for Medium Farms;
- c) Field observations at individual farms (minimum of 5 farms, but more farm visits are recommended);
- d) Worker interviews (whenever possible);
- e) A detailed review of PU documents, including the CIP, training records, adoption records, etc.;
- f) Cross-checking PU level documents (e.g. training and adoption records) with farmer interviews on a sample basis;
- g) Observing the PU Manager and Field Facilitators in their daily work, for example, observing training sessions, farmer focus groups, or shadowing Field Facilitators on individual farmer visits;
- h) Individual interviews with the PU Manager and Field Facilitators to understand knowledge strengths and areas for improvement;
- i) An assessment of year on year progress in achieving CIP goals and identification of any areas of challenge that require support;
- j) A closing meeting with the PU Manager and Field Facilitators to discuss findings, corrective actions, and any next steps.

9.3 Outcomes of PU Support Visits

- 9.3.1 After the visit, findings are reported using the PU Support Visit template, available on the [assurance page](#) of the BCI website.

- 9.3.2 The IP Representative carrying out the PU Support Visit should complete the report and the detailed Action Plan and share back with the PU Manager within 3 weeks of the visit.

- 9.3.3 Copies of the PU Support Visit reports are to be shared with the BCI Country Teams at least once per year, or when requested.

- 9.3.4 If an IP determines at any time (including through a PU Support Visit) that a PU has significant gaps in meeting any of the Core Indicators, the IP is expected to notify the BCI Country team in writing of the issue

- a) This information will not lead to an automatic licence cancellation but may result in an additional Surveillance Assessment being carried out.

10 Surveillance Assessments (PUs only)

10.1 Overview

- 10.1.1 Surveillance Assessments are carried out on a sample of licensed PUs in the second or third year of an active licence.
- 10.1.2 Surveillance Assessments are conducted by either qualified BCI Programme Officers/Coordinators or approved third-party verifiers.
- 10.1.3 The objectives of Surveillance Assessments are to:
 - a) Confirm that the PU continues to comply with all Core Indicators;
 - b) Check that any non-conformities from previous assessments have been fully closed;
 - c) Ensure the PU is making progress against priority areas in the Continuous Improvement Plan (CIP);
 - d) Provide feedback to the PU on any compliance gaps or improvement recommendations.

10.2 Sampling

- 10.2.1 Surveillance Assessments are carried out on a minimum of 5% of licensed PUs globally, each year.¹⁴
- 10.2.2 The sample of PUs to receive a Surveillance Assessment is calculated by the BCI Assurance Managers based on the following factors:
 - a) PUs with over 33% new farmers
 - b) PUs with a high rate of non-conformities during previous assessments
 - c) Balanced distribution across IPs, Local Partners, and regions
 - d) Third-party information on risk factors (i.e. known sustainability issues or labour violations in a specific region)
- 10.2.3 The list of any PUs to receive a Surveillance Assessment will be shared with the relevant IP by BCI Country Teams at least five working days ahead of the visit.

10.3 Format and timing

- 10.3.1 Surveillance Assessments follow the same general format and timing as a Licensing Assessment (see [8.2 Format and Timing](#)).
- 10.3.2 Surveillance Assessments can be carried out any time during the crop season from start of sowing to end of harvest.

10.4 Outcome of Surveillance Assessments

- 10.4.1 During the closing meeting at the end of a Surveillance Assessment, the BCI assessor or third-party verifier will discuss and share a short, written summary of key findings with the PU Manager.
 - a) This will include both positive elements of the PU's performance as well as areas where there are potential gaps against the Core Indicators or further improvements could be made.

¹⁴ The use of Surveillance Assessments will be phased in over 2020-2023 as BCI transitions into the revised assurance model implemented in 2020

This summary of findings should be used as the basis to guide the closing meeting discussion, and a copy will be left with the PU Manager to ensure there is clear communication of assessment findings. No non-conformity gradings should be communicated at this point (as these are subject to Assurance Manager oversight); only fact-based descriptions of potential issues identified.

- 10.4.2 After the visit, the full set of findings are documented using the BCI Assessment Report template, available on the [assurance page](#) of the BCI website.
- 10.4.3 The Assessment Report, summary of key findings, and supporting evidence are shared with BCI Assurance Managers for a final review and decision:
- 10.4.4 If compliant with all Core Indicators, or if only incidental non-conformities are identified, the PU will retain its current licence.
- a) If systemic non-conformities are identified, the active licence will be cancelled and another Licencing Assessment will be required before the licence can be reinstated (see [16.1 Licence Cancellation](#)).

- 10.4.5 Once reviewed by the BCI Assurance Managers, the final report is shared with the PU Manager.

Reports are generally expected to be completed and shared with the PU Manager within 3 weeks of the visit. The report also includes a section outlining improvement recommendations. These advise the PU on potential risks or weaknesses observed during the visit as well as opportunities for further development. Improvement recommendations should be incorporated into the PU's continuous improvement planning process.

- 10.4.6 If any non-conformities (incidental or systemic) are identified during the assessment, BCI will also share a Corrective Action Plan (CAP) template with the PU Manager
- a) The PU Manager must complete the CAP and return the BCI Country Team within 10 working days.

Refer to [17. Non-conformities and Corrective Actions](#) for more information on non-conformities and licensing.

11 Additional Verification Activities

If significant environmental, social, or economic threats are identified in an area where licensed BCI Producers are operating, BCI may request additional verification activities to help safeguard the credibility of the Better Cotton Standard System. This could be applicable for example if third-party reports show high uses of child labour, or a credible research study suggests continued use of banned pesticides in a specific region.

11.1 Additional Verification Activities

- 11.1.1 In specific cases where risk areas have been identified (e.g. through credible third-party information or monitoring of external data), BCI may commission additional verification activities to assess Producer compliance with specific Core Indicators.
- 11.1.2 Additional verification activities:
- a) Can consist of either field-based visits or remote interviews/ document checks;
- b) Are carried out by designated technical experts approved and commissioned directly by BCI Assurance Managers.
- 11.1.3 If additional verification activities are commissioned by BCI, the Producer (either Large Farm Manager or PU Manager and IP representative) will be notified in writing with a minimum of 24 hours' notice.

- 11.1.4 All findings of additional verification activities are shared, in writing, with BCI Assurance Managers, who will review any outcomes and make final decisions on licensing impacts:
- a) Identification of systemic non-conformities will result in the licence being cancelled and a Corrective Action Plan (CAP) being developed.
 - b) Identification of incidental non-conformities will not affect the licence but will require development of a CAP within ten working days of being informed of the findings.
- 11.1.5 Failure to comply with a request for additional verification activities (such as refusing access to assessors, or non-submission of requested information) can lead to a licence cancellation (see [16.1 Licence Cancellation](#)).

12 Continuous Improvement

12.1 Continuous Improvement for Producers

- 12.1.1 As required under Core Indicator 7.1.1, all Producers must develop and implement a Continuous Improvement Plan (CIP) before they can be licensed to sell Better Cotton
- a) The CIP is to be developed according to a specified process that supports Producers to identify their greatest areas for improvement, define and prioritise interventions, and monitor and record progress in achieving their goals.

This process allows Producers to tailor the CIP plan to their performance level and commit to improvement goals that are relevant, achievable, and measurable.
- 12.1.2 During the active licence period, Producers are expected to focus on the implementation and achievement of the CIP.
- a) Producers (with the support of Implementing Partners for PUs) should shape their capacity building programme around the priorities identified in the CIP.
 - b) PUs are expected to regularly monitor the effectiveness of training and other interventions, through tracking levels of farmer understanding and awareness and (eventually) adoption of more sustainable practices.
- 12.1.3 Both PUs and LFs are required to demonstrate year-on-year progress in achieving their CIP goals, and to engage in an annual review process to ensure they build on successes and address any areas of challenge.
- 12.1.4 The assurance process provides a framework of both accountability and support to ensure Producers make continued progress against the priorities identified in the CIP.
- 12.1.5 The Readiness Check (for PUs) and initial licensing assessment (for all Producers) reviews the initial CIP and checks whether the priorities and timeframes are appropriate and realistic; they also assess the level of competence and understanding of the PU/LF Manager and Field Facilitators (for PUs).
- 12.1.6 For licensed Producers, the annual self-assessment tracks year on year progress against targets in the CIP and identifies key challenges or areas where further support is needed.
- 12.1.7 For PUs, the PU Support Visits and Surveillance Assessments also have a strong focus on continuous improvement. These visits are designed to help measure progress against the CIP and identify areas where additional support or expertise is needed to help the PU achieve its targets.

- 12.1.8 The Licensing Assessment to renew a licence also evaluates whether the Producer has made progress against the initial CIP; based on cross-checking farming practices and levels of farmer awareness/understanding.

If the Licensing Assessment to renew a licence finds that a Producer has not demonstrated clear progress against priority areas identified in the CIP, a systemic non-conformity can be raised against 7.1.1 and the licence will not be renewed.

13 Licensing Decisions

13.1 Licensing Decisions

- 13.1.1 All final licensing decisions are made by BCI Assurance Managers based on a review of the outcome of a Licensing Assessment, including the report itself and any supporting evidence where appropriate.
- 13.1.2 All licences to sell Better Cotton are issued for a standard duration of 3 years.
- 13.1.3 Large Farms receive licences on an individual basis, and a Producer Unit (PU) is awarded a single licence covering all farmers within the PU.
- 13.1.4 Licence decisions for Large Farms are communicated directly to the farm manager.
- 13.1.5 Licence decisions for all PUs operating under an Implementing Partner (IP) are communicated to the designated IP representative or PU Manager.

The licensing communication also identifies the conditions associated with individual licences. In the context of PUs, the IP representative is responsible for sharing licensing information with individual PU Managers.

14 Active Licence Period

14.1 Active Licence Period

- 14.1.1 During the 3-year active licence period, Producers are expected to fulfil annual requirements to maintain the licence:
- a) Submit annual Producer data to BCI by specified deadlines;¹⁵
 - b) Complete an annual self-assessment survey (and internal assessment, for PUs only);
 - c) Implement corrective actions and fully address any incidental non-conformities identified through a Licensing or Surveillance Assessment, or PU Support Visit;
 - d) Demonstrate progress in achieving the goals identified in the CIP;
 - e) Submit [Results Indicator](#) (RI) reporting 12 weeks after the end of harvest (see [Results Indicators Reporting](#)).
- 14.1.2 During the licence period PUs are also required to participate in at least one PU Support Visit, and if applicable, a Surveillance Assessment.

¹⁵ PU data includes (but is not limited to) name and contact information of Producer Unit Manager; list of farmers organised into Learning Groups (for smallholder Producer Units); age, gender, education, level of farmers; expected seed cotton production per farmer and area under cultivation; geo-location of Producer Units; names of gins. For LFs, Producer data includes (but is not limited to) name of LF Manager; expected seed cotton production and area under cultivation; geo-location of farm; name of gin(s).

- 14.1.3 If changes in farmer composition result in the percentage of new farmers in the PU exceeding 33% at any point during the active licence period, the PU must undergo a Surveillance Assessment in order to maintain the licence.¹⁶

15 Annual Licensed Volumes

15.1 Annual Licensed Volumes

- 15.1.1 All Producers with an active licence to sell Better Cotton will receive an annual licensed volume allocation – this enables their cotton to be sold into the supply chain as ‘Better Cotton.’

The licensed volume is based on projected cotton production (typically captured through the self-assessment reporting) and is an estimate of the volume each Producer can sell into the supply chain as ‘Better Cotton’

- 15.1.2 Producers in most countries where BCI operates will receive an [Annual Authorised Volume \(AAV\) code](#) once a year at the licensing date:
- The AAV code is a unique code, specific to each Producer, that is linked to the volume of licensed cotton produced by that PU or LF.
 - The AAV code is to be passed on to buyers of the cotton (i.e. ginners) so that purchases of Better Cotton can be entered into the [Better Cotton Platform](#).
 - A new, unique AAV code is generated each year for every Producer with an active licence; and is valid for the duration of the season
- 15.1.3 AAV codes are communicated out to IP representatives (or Large Farm managers) by BCI Country Teams during the annual licensing deadline.
- 15.1.4 In countries where combined gin inventories are used (rather than individual AAV codes), the total volume of licensed cotton will be updated in the Better Cotton Platform on an annual basis.

16 Licence Cancellation

New Producers remain ‘unlicensed’ until a Licensing Assessment has been carried out with no systemic non-conformities identified (following the set-up phase and a Readiness Check for PUs). Once a licence is issued, it remains valid for the 3-year period unless the Producer fails to meet a specific requirement (such as submitting RI data), there is a change in the Producer’s overall status (i.e. the PU is dissolved), or a systemic non-conformity is raised during an assessment. In some cases, a Licensing Assessment is required before a cancelled licence can be reinstated – refer to the table below. All changes to licensing status are approved by a BCI Assurance Manager.

16.1 Licence Cancellation

- 16.1.1 A licence cancellation is when a Producer’s active licence becomes invalid for a specified period due to a failure to comply with at least one of the licensing requirements (see [Overview of Licensing Requirements](#)) or due to an administrative reason.
- 16.1.2 Licences can be cancelled for the current season or for the following season, depending on the timing of the issue (i.e. whether it occurred before or after the [licensing date](#) - refer to [Table 4: Licence Cancellations](#)).
- 16.1.3 Producers with a cancelled licence are not permitted to sell cotton as ‘Better Cotton’ during the cancellation period; however, the Producer can continue participating in

¹⁶ The ‘percentage of new farmers’ is calculated as the number of new farmers/total farmers in the PU for the current season * 100.

the BCI programme, with farmers receiving training and support from the IP and PU staff.

16.1.4 Active licences are cancelled in the following cases:

- a) Self-assessment is not submitted on time;
- b) Results Indicator (RI) reporting data is either:
 - i. not submitted on time
 - ii. incomplete
 - iii. systematically erroneous (e.g. fertilizer data in place of pesticide data)
 - iv. falsified or fabricated (or cannot be verified through cross-checking)
- c) Corrective actions to address incidental non-conformities have not been implemented within the six-month timeframe;
- d) Systemic non-conformity is found during a Licensing or Surveillance Assessment (or additional verification activity as in Section 11);
- e) Scheduled assessments are not carried out (for example, the Producer refuses access);
- f) Corrective Action Plan (CAP) for incidental non-conformity is not submitted by the required deadline or is incomplete or insufficient quality.

16.1.5 For non-submission of self-assessment or RI reporting, the existing licence is reactivated following the one season cancellation period.

- a) In all other cases of cancellation, a Licensing Assessment is required before the licence can be reactivated.

Table 4: Licence Cancellations

In the table below, the current season refers to 2020/21 to help provide an example

Timing of Issue	Cause	Current season impact (e.g. 2020/21)	Next season impact (e.g. 2021/22)	Following season (e.g. 2022/23)
Before Licensing Date	a. Self-assessment not submitted on time b. RI reporting from the <u>previous season</u> not submitted, or insufficient quality data (N/A for new Producers)	Licence cancelled for the season (or if new Producer, not eligible for licensing)	<ul style="list-style-type: none"> • Existing licence reactivated, or • Eligible for licensing (if new Producer or licence has expired) 	N/A
	c. Incidental non-conformities (NCs) from previous season not fully closed within the six-month timeline d. Systemic NC on Licensing or Surveillance Assessment ¹⁷ e. Failure to carry out scheduled assessment f. CAP not submitted or is incomplete or insufficient quality	Licence cancelled (or if new Producer, no licence granted)	Licensing Assessment required before the licence can be issued (or reactivated)	N/A

¹⁷ Systemic NC can also be raised during an additional verification (see [11 Additional Verification Activities](#)).

Timing of Issue	Cause	Current season impact (e.g. 2020/21)	Next season impact (e.g. 2021/22)	Following season (e.g. 2022/23)
After Licensing Date	a. Systemic NC on Licensing or Surveillance Assessment ¹⁸ b. Failure to carry out scheduled assessment c. CAP not submitted or is incomplete or insufficient quality	No impact (production can be sold as Better Cotton)	Licence cancelled	Licensing Assessment required before the licence can be reactivated

16.2 Other Reasons for Licence Cancellation

16.2.1 Licences can also be cancelled if there is a change in the status of the Producer, for example:

- a) The PU stops growing cotton [PUs only]¹⁹
- b) The PU is dissolved, e.g. due to the IP contract being terminated [PUs only]

17 Non-conformities and Corrective Actions

17.1 Non-conformity Gradings and Consequences

17.1.1 Non-conformities (NCs) identified during Licensing Assessments and Surveillance Assessments are graded as either incidental or systemic, as set out in Table 5.

Table 5: Incidental and Systemic Non-Conformities

NC Grading	Description of Finding	Consequences	Follow-Up
Incidental	For Producer Units: a) Non-conformity on a Core Indicator is observed as an isolated event, limited in temporal and spatial scale, and b) Producer Unit has provided sufficient evidence that the internal management system (IMS) should prevent such practices	Corrective action plan to be completed within ten working days of being notified of assessment findings	BCI staff verify the implementation of corrective actions, either through a remote evidence review and/or through a site visit
	For Large Farms: a) The impacts of the non-conformity are limited in temporal or spatial scale, and/or b) It does not result in a fundamental failure to achieve the objective of the indicator.	The Producer has six months to implement corrective actions to prevent the identified non-conformity from re-occurring in future.	

¹⁸ Systemic NC can also be raised during an additional verification (see [11 Additional Verification Activities](#)).

¹⁹ In the case of LFs, the licence remains valid for the remainder of the licence period

NC Grading	Description of Finding	Consequences	Follow-Up
Systemic	<p>For Producer Units:</p> <p>a) Corroborative evidence demonstrates that a Core Indicator is not respected, and</p> <p>b) Producer Unit cannot provide sufficient evidence that the internal management system (IMS) prevents such practices</p>	The Producer is denied a licence (for a Surveillance Assessment, the PU's active licence is cancelled).	Implementation of corrective actions is checked during the subsequent Licensing Assessment
	<p>For Large Farms:</p> <p>a) Non-conformity occurs repeatedly, or</p> <p>b) Results in a fundamental failure to achieve the objective of the indicator</p>	Corrective action plan to be completed within ten working days of being notified of assessment findings	For PUs, IPs should support the PU in implementing corrective actions and verify their effectiveness before another Licensing Assessment

17.2 Escalation of Incidental Non-conformity

17.2.1 An Incidental non-conformity is automatically escalated to a systemic non-conformity in the following circumstances:

- The Producer fails to close the incidental non-conformity within the six-month timeframe,
- The Producer fails to submit adequate evidence of non-conformity closure,
- The assessor's follow-up visit finds that corrective actions have not been implemented and/or effective.
- The incidental non-conformity is recurrent – the same non-conformity issue is identified in two consecutive assessments (either licensing or surveillance assessments).

17.2.2 In specific circumstances, BCI Assurance Managers may decide not to escalate a recurrent incidental non-conformity. This is the case only if:

- There is clear evidence that the Producer has made significant progress in addressing the root cause of the non-conformity, and exceptional circumstances have prevented full closure of the non-conformity, or
- The incidental raised in the second assessment relates to a different issue compared to the initial non-conformity.

17.3 Corrective Action Plans

17.3.1 If a Licensing Assessment identifies incidental and/or systemic non-conformities, the PU/LF Manager must complete a Corrective Action Plan (CAP) for all non-conformities.

- The assessor shares the CAP template with the PU Manager/LF Manager after the assessment, with the non-conformities populated.
- The PU Manager or LF Manager is responsible for identifying the root cause and outlining remediation steps and owners for all non-conformities identified.

17.3.2 The CAP is submitted by the PU/LF Manager to BCI country team within ten working days of receiving the assessment outcome:

- a) If the CAP is incomplete or poor quality, BCI may request corrections before the CAP is considered acceptable.
- 17.3.3 In case of incidental non-conformity, failure to submit an acceptable CAP by the required deadline results in licence denial (for new Producers), or the licence being cancelled for one season (for licence holders):
- a) If the required CAP deadline occurs before the licensing deadline, the current season licence is cancelled.
- b) If the required CAP deadline occurs after the licensing deadline, the licence is cancelled for the following season.
- 17.3.4 For PUs, the IP is responsible for supporting the PU Manager to develop an appropriate CAP and for monitoring the PU to ensure that the agreed corrective actions are implemented
- 17.3.5 The implementation of the CAP may be verified by BCI approximately six months after the licence was issued
- a) This can take the form of an on-site visit or a remote documentation review and phone/video/email communication.
- 17.3.6 If sufficient evidence is not submitted to confirm that root causes are identified and corrective actions implemented (to the extent possible given seasonal timing), the licence will be cancelled for one season, subject to BCI Assurance Manager review (see [16.1](#) Licence Cancellation).

18 Variations and Extensions

The BCI assurance model allows for variations or time extensions on certain requirements, as outlined below.

18.1 Variations Process

18.1.1 Variations can be requested in the following cases:

Variation type	Deadline for request
Recommend a new PU for licensing in its first season of participation, provided the relevant criteria are met (see 4.2 Timing of the Set-Up Phase)	End of sowing <i>[Note that the Readiness check must also have been completed by the IP by this deadline, before submitting a variations request, demonstrating the PU is fully compliant and ready for licensing]</i>
Request an additional (third) season in set-up phase for a PU that is not yet ready for licensing	End of sowing
Request an extension for additional time to meet a required assurance deadline, such as farmer lists, self-assessment, Results Indicator (RI) reporting, or closure of incidental non-conformities	At least ten working days <u>ahead</u> of the original deadline

18.1.2 All requests for variation and extension are to be submitted through the process found on the [assurance page](#) of the BCI website.

- a) Requests are to be submitted by the PU Manager or LF Manager, in English, and must cover all information required in the form.
- b) Requests must include a clear rationale and supporting evidence where required.

- 18.1.3 Variation/ extension requests are decided on by BCI Assurance Manager(s):
- a) Decisions will be communicated back to the Producer within 5 working days of receiving a complete variation/ extension request (with evidence).
 - b) Extension requests are generally granted for two weeks, unless the Producer requests additional timing and provides a clear rationale.

19 Appeals Process

19.1 Appeals Process

- 19.1.1 Under the Better Cotton assurance model, Producers can appeal against a licensing decision within 10 working days of being informed of the licensing decision.
- 19.1.2 The appeals procedure is designed to be used in cases where the Producer has clear evidence of professional misconduct or negligence on the part of the assessor (i.e. BCI Programme Officer/ Coordinator or third-party verifier).

The Appeals Procedure should not be triggered due to the fact that a Producer disagrees with the evidence-based findings of a Licensing Assessment.

- 19.1.3 Appeals must be filed using the form on the assurance page of the [BCI website](#).
- 19.1.4 Appeals received by the BCI Assurance Managers are first reviewed for eligibility. Appeals are considered ineligible for processing if they are received after the deadline, the appeals form is incomplete, or it does not contain sufficient evidence of professional misconduct or negligence on the part of the assessor.
- 19.1.5 Decisions on eligible appeals are made by a subset of members from BCI's Appeals Committee, which comprises BCI Country Managers and third-party verifiers or independent consultants.
- 19.1.6 Within 14 days of receiving an eligible appeal, BCI's Assurance Managers will designate a specific panel composed of 1-3 members of the Appeals Committee, who will review and decide on the appeal in question.
- 19.1.7 Members of the panel are selected based on impartiality, technical knowledge of the relevant BCI principles, understanding of local context, and availability.
- 19.1.8 The panel will exclude any members with conflicts of interest – for example, a third-party verifier who carried out the verification visit against which the Producer is appealing
- 19.1.9 The dedicated appeals panel will review and decide on an appeal within 35 calendar days of receipt of the appeal
- a) The appellant will be notified in writing of the decision and the rationale
 - b) All appeal decisions are final.

20 Oversight

20.1 Oversight Mechanism

- 20.1.1 BCI is committed to ensuring the continued effectiveness and integrity of its assurance model through external oversight.
- 20.1.2 External oversight activities are conducted as part of periodic system reviews and are performed by an independent body at least every 3-years.
- 20.1.3 Further details of BCI's oversight mechanism are outlined in the publicly available [Assurance Programme System Review](#) document.

Annex A. Timeline of Assurance Activities

The specific dates associated with the timelines below are set by country/sub-region at the beginning of the season based on the expected timing of the crop season. All dates will be communicated to Implementing Partners and Large Farms at the beginning of the season.

Table 6: Timeline of Assurance Activities

Activity	Start timing	End timing (deadline)
IPs or LFs confirm Producer data ²⁰	4 weeks before start of sowing	End of Sowing
IPs Submit farmer lists	4 weeks before start of sowing	End of Sowing (final confirmed farmer lists)
Internal Assessment (recommended timing)	Start of sowing (recommended timing)	End of sowing (recommended timing)
Self-Assessments	End of sowing	4 weeks after End of Sowing
IPs submit Early Season Reporting	Start of sowing	End of sowing
Readiness checks	Start of sowing	End of harvest ²¹
IPs submit 'recommended for licensing' list of new PUs	N/A	End of sowing
Licensing or Surveillance Assessments	Start of sowing	End of harvest ²²
PU Support visits (on licensed PUs)	Start of sowing	End of harvest
Deadline to complete Corrective Action Plan (CAP) template	N/A	10 working days after findings are communicated back to the Producer
IPs or LFs submit Results Indicator (RIR) reporting	Start of sowing	12 weeks after end of harvest (final confirmed RI reporting submitted)
Deadline to implement corrective actions for Incidental non-conformities	N/A	six months after findings are communicated back to the Producer

²⁰ PU data includes for example the name and contact information of the PU Manager; list of farmers organised into Learning Groups (for smallholders); age, gender, and education level of farmers; expected seed cotton production per farmer and area under cultivation; geo-location of PUs; names of gins. LF data includes for example the name of LF Manager; expected seed cotton production and area under cultivation; geo-location of farm; and name of gin(s).

²¹ Note that if a PU is recommended for licensing in its first season, the Readiness Check needs to be carried out and report documented by the end of sowing deadline for a variation to be requested

²² Most Licensing Assessments for new Producers will be carried out before the designated licensing date (usually towards the start of harvest). However, in some cases Licensing Assessments may be scheduled after licensing date; in these cases, a conditional licence will be issued and if a systemic non-conformity is identified, the Producer's licence would be cancelled for the following season (see [16.1 Licence Cancellation](#))

Annex B. Large Farm Group Model

Some Large Farms participate in the Better Cotton Standard System through a Large Farm Group Assurance model.²³ In the Group Assurance model, local farms join together under the guidance of a designated Group Manager, who is typically from a coop or merchant, and may work with local gins or growers' associations as Local Partners. The Group Manager (and local partner representatives, where relevant) are responsible for organising a group of participating large farms and providing them with farm-level support. This includes helping farmers understand licensing requirements, gathering data, conducting farm visits and Licensing Assessments, and helping to coordinate assessments conducted by third-party verifiers. The organisation employing a Group Manager is required to be (or become) a member of BCI and is considered an Implementing Partner (IP), although their responsibilities differ slightly from IPs that work with Producer Units.

B.1 Group Model organisation

B.1.1 Large Farms that wish to participate in the Better Cotton Group Assurance model are organised into a group under the oversight of a designated Group Manager.

In some cases, Group Managers may be employees of an Implementing Partner. Group Managers may also delegate responsibilities to Local Partners (such as gins) that conduct assurance activities on behalf of the Group Manager. Delegation of roles to Local Partners should be documented at the beginning of each season through the LP Task Delegation Checklist

B.1.2 Group Managers are responsible for the following activities:

- a) Regular engagement and outreach to participating farmers in the group
- b) Ensuring timely submission of data from participating farms, including participating Producers' contact information, early season-data and end-of-season Results Indicator (RI) Reporting
- c) Supporting farmers through capacity building and knowledge sharing, to help ensure that farmers comply with BCI Core Indicators and develop/implement continuous improvement priorities
- d) Supporting farmers to complete the self-assessment, including gathering additional evidence to cross check responses where necessary
- e) Coordinating with BCI and farmers to confirm assessment schedules
- f) Contracting with third-party verifiers to complete required assessments
- g) Carrying out Group Manager assessments directly (or supporting the designated IP/ Local Partner representative in carrying these out)
- h) Finalising reports for Group Manager assessments, including working with BCI Country Teams or Assurance Managers to provide additional evidence or clarification when requested

B.1.3 Group Managers (and Local Partners as applicable) are also required to participate in regular trainings and meetings led by BCI Country Teams.

²³ This model was introduced formally in 2018 and is currently applicable only in the United States, due to the presence of a number of preconditions, including: (i) comprehensive government regulations, (ii) existing support systems of technical assistance, and (iii) demonstrated low risk of non-compliance based on analysis of licensing data. The Group Model may be expanded to other regions in the future.

B.2 Group Model Assessments

- B.2.1 All farms within a group complete individual annual self-assessment surveys evaluating their practices against the Core Indicators (including the Continuous Improvement Planning requirements).
- B.2.2 Each year, a sample of farms within each group receive a Licensing Assessment, according to the following sampling requirements:
 - a) Assessments conducted by third-party verifiers - 8.3% (1/12th) of group members
 - b) Assessments conducted by BCI – 10% of group members
 - c) Assessments conducted by the Group Manager (or designated representative) – 30% of group members
- B.2.3 Either the Implementing Partner or the Group Manager is responsible for commissioning third-party assessments directly:
 - a) The same verification organisation will not be able to carry out assessments on more than 50% of the sample size (i.e. farms receiving third-party assessments within the same group) in two consecutive years, beginning from the 2020/21 season.

This requirement ensures that Group Managers have some rotation of third-party verifiers, in order to maintain credibility and objectivity. For example, if a Group Manager has 10 farms requiring third-party verifier visits in 2020/21 and they use Organisation A for 8 of these visits, the group would have to allocate fewer than 5 visits (less than 50%) to Organisation A in the following year, 2021/22. However, if the group uses Organisation A and Organisation B to each carry out 5 visits (50% of the total), they could continue using both verifier organisations (at the same ratio) in perpetuity.

- B.2.4 The assessment process for Large Farms under the Group Model follows the process requirements outlined under Licensing Assessments (see [8.2 Format and Timing](#))

B.3 Assessment outcomes and licensing

- B.3.1 Findings from all assessments are reported using the BCI Assessment Report template, available on the [assurance page](#) of the BCI website.
- B.3.2 The outcome of all assessments are reviewed, and final licensing decisions are made by BCI Assurance Managers
- B.3.3 If all assessments are completed as per [criteria B.2.2](#) above
 - a) All farms with a compliant outcome from an assessment receive a standard 3-year licence to sell Better Cotton
 - b) All farms that are due for licensing (but did not receive an individual assessment) also receive a new 3-year licence to sell Better Cotton [note, these farms may still be checked during the following years' assessment schedule]
 - c) If a systemic non-conformity is identified during the assessment of an individual farm, that individual farm's licence is denied or cancelled
- B.3.4 A Large Farm with a denied or cancelled licence will be eligible for another licensing assessment the following season
- B.3.5 To continue participating in the Group Model and maintain an active licence, each Large Farm within a group is required to:
 - a) Complete an annual self-assessment by the required deadline

- a) Maintain conformity with all Core Indicators, including demonstrating year-over-year continuous improvement in sustainable farming practices (as evaluated through annual self-assessment and any potential assessments)
- b) Comply with any scheduled assessments during the active licence period
- c) Submit annual Results Indicator (RI) reporting data by the deadline, 12 weeks after harvest

B.3.6 If a Large Farm does not meet the requirements above, the individual licence can be cancelled (refer to [16.1 Licence Cancellation](#) Licence Cancellation)

During the licence period, Large Farms under the Group Model are expected to demonstrate achievement of their individual Continuous Improvement Plans, in line with the requirements under section [12 Continuous Improvement](#). Section [16 Licence Cancellation](#) is also applicable to Large Farms operating under the Group Model.