Approval Procedure for Verifiers

Applicable from 2021-22 Season

This document presents the different procedures developed by Better Cotton for approving third-party verifiers: what are the core competencies required, the application/approval procedures in place or the complaint handling process for professional misconduct or negligence.
**Glossary**

**Implementing Partner:** Organisations with local expertise who oversee the set-up and management of Producer Units under Better Cotton’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.

**Large Farm:** Under the Better Cotton 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.

**Lead Verifier:** Individual third-party verifiers who have been approved by Better Cotton to lead Licensing or Surveillance Assessments of Producers.

**Licensing Assessment:** Assesses a Producer’s (Producer Unit or Large Farm) compliance with the Core Indicators of the Better Cotton Principles and Criteria to inform the final licensing decision made by Better Cotton Assurance Managers, either for an initial license or renewal.

**Producer Unit:** A Producer Unit is a group of Smallholders or Medium Farms who participate in the Better Cotton 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 is typically between 3,500 to 4,000 farmers for Smallholders and around 100 farmers for a Medium Farm PU.

**Shadow Verification:** A visit conducted by a Lead Verifier in the presence of a Better Cotton staff member or designated consultant observing how the different components of a third-party verification visit are performed by the verifier (conducting interviews with farmers, workers, documentation review, interview with management, or visual inspection of the farm).

**Strategic Partner:** Strategic Partners acting as Better Cotton following strategic partnership agreements.

**Supporting Verifier:** Individual third-party verifiers who form part of a verification team led by a Better Cotton approved lead verifier.

**Surveillance Assessment:** Confirm that a Producer Unit with an active licence continues to comply with all Core Indicators and verifiers that any non-conformities from previous assessments have been fully closed.
1. Introduction

The Better Cotton Assurance Programme involves farmers participating in a continuous cycle of learning and improvement; it is the central mechanism for assessing whether farmers can grow and sell Better Cotton. The main objectives of the assurance model are to:

1. Verify that cotton Producers have met the Core Indicators of the Better Cotton 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

Better Cotton’s approach to assurance is unique from many other standard systems. It aims to balance credibility with scalability and cost-effectiveness, through combining third-party verifier assessments with other types of assessments. Better Cotton’s approach combines third-party visits with licensing assessments by Better Cotton Country Teams, support visits by Implementing Partners (IPs), and regular self-assessments by Producers themselves.

Licensing Assessments and Surveillance Assessments are carried out by Better Cotton Country Coordinators and Officers (or Strategic Partners operating on behalf of Better Cotton in partnership countries) and third-party verifiers.

In the Large Farm context, Large Farms commission Licensing Assessments directly with approved third-party verifiers. In the Producer Unit context, a PU is recommended for licensing by the Implementing Partner, after which the PU receives a Licensing Assessment by either an approved third-party verifier or a qualified Better Cotton staff member. If the Producer meets all Core Indicators and is progressing against the priorities outlined in its Continuous Improvement Plan, a licence to sell Better Cotton is granted for 3 years. The objective of the Licensing Assessment is to:

1. Verify whether the Producer is in conformity with the Core Indicators to inform the final licensing decision made by Better Cotton Assurance Managers;
2. Check progress against the Continuous Improvement Plan (CIP) and provide improvement recommendations to the Producer Unit (PU) to support further sustainability improvements;
3. If incidental non-conformities are identified, provide the Producer with a nonconformity report to enable the PU/LF Manager to develop a Corrective Action Plan (CAP);
4. Provide the Better Cotton Assurance Managers with a sufficient level of confidence to decide whether to issue, or renew, a licence to sell Better Cotton

During the second or third year of the active licence period, a sample of PUs also receive a Surveillance Assessment by either an approved third-party verifier or a qualified Better Cotton staff member. Large Farms do not receive Surveillance Assessments. The objective of the Surveillance Assessment is to:

1. Confirm that the PU continues to comply with all Core Indicators;
2. Check that any non-conformities from previous assessments have been fully closed;
3. Ensure the PU is making progress against priority areas in the Continuous Improvement Plan (CIP);
4. Provide feedback to the PU on any compliance gaps or improvement recommendations.

The Better Cotton third-party verification approach requires verifiers to demonstrate independence, impartiality, and a high degree of rigor and thoroughness in assessing compliance with the Better Cotton Production Principles and Criteria.

This document describes the qualifications and competencies the Better Cotton is looking for in third-party verifiers and provides guidance to the verification organisations on the application/approval process, performance review, and the process for handling complaints against verifiers.

2. Qualifications and competencies of potential verifiers

Better Cotton is seeking applications for approval from qualified verification organisations and verifiers. Prospective verification organisations and verifiers may apply for approval for one or more countries.

Any organisation, company, or individual seeking approval as an independent verifier should initially read and be familiar with the following Better Cotton documents:

- Better Cotton Principles and Criteria Version 2.1
- Better Cotton Assurance Manual 4.2

At a minimum, verification organisations and verifiers must demonstrate the following core competencies for each country for which they seek to gain and maintain approval:

2.1 Lead Verifier Qualifications

**Essential**

- University degree in agriculture, natural resources, environmental management or other relevant subject is encouraged but not required. Experience may substitute for education
- 3 years of auditing or other work experience in (cotton) farming, natural resources or environmental management
- Trained in auditing principles, procedures, techniques and behaviours as described in ISO 19011
- Knowledge of national and local laws and regulations on the environment, labour, health and safety, land and water ownership in the country where the verification visits will take place
- Knowledge of prevailing industry and cotton farming practices Knowledge of local social and cultural conditions to be considered in the conduct of a verification visit
- Ability to communicate clearly in English both verbally and through the writing of verification reports

**Desirable**

- Pass ISO 19011 auditing training course and/or ISO 9001/ISO 14001 Lead Auditor course or comparable local/ national alternative
• Experience in identifying and gathering information from knowledgeable local organisations / individuals, including human rights, labour, environment, cotton or other leading local institutions that are likely to have the trust of farmers and workers and knowledge of local conditions

• Strong social auditing competencies demonstrated through:
  o Post-secondary education and/or 1 year experience in social work or services that includes labour welfare or labour affairs;
  o 2 years’ experience working on a farm or plantation directly related to managing labour in an operational capacity (general farm management / human resources);
  o 2 years’ experience in performing a gap analysis, internal social audits or second- or third-party social assessments
  o Successfully taken and passed the accredited 5-day SA8000 basic auditing course or equivalent (equivalent courses include Amfori 5-day auditor training course or another 2-day minimum auditor course); or
  o Be an APSCA Registered Audit or APSCA Certified Social Compliance Auditor

2.2 Lead Verifier Competencies
Demonstrate a good understanding of the Better Cotton Principles and Criteria
To be able to:

• Describe the intent and requirements of the Better Cotton Principles and Criteria
• Demonstrate an understanding of how the P&Cs apply to the local context
• Assess PUs’ and LF’s compliance with the core and improvement indicators (where relevant)

Language
• The ability to read and communicate effectively in the language(s) used by workers, community organisations, Learning Groups, Producer Units or others during the verification audit. If an interpreter is needed, s/he should ideally be independent from the organisation being verified.

Information Gathering from Local Knowledgeable Sources
To be able to:

• Use knowledge gained from local sources to help create an effective verification approach that covers key relevant issues
• Gather and report information in a way that does not compromise the independence of an organisation or its ability to conduct its work

Auditing Skills
To be able to:

• Apply appropriate audit principles, procedures and techniques to the planning and execution of the third-party verification so that the checks are conducted in a consistent, systematic, impartial and objective manner;
• Conduct visual observation and surveillance in and around cotton farms and detect non-conformities with Better Cotton Principles and Criteria
• Demonstrate the understanding and implementation of interviewing and facilitation techniques including the ability to:
  o Approach and engage all those interviewed in a non-threatening and effective manner
Interview workers in ways that enable the interviewer to pursue lines of inquiry, while allowing those interviewed to report their experiences.

Conduct interviews under conditions that reassure workers they can discuss sensitive issues.

Gather and report information in a way that does not subject the workers being interviewed to any negative consequences as a result of the interview.

- Identify non-conformities or potential non-conformities that may not be apparent in routine observation, including practices of concealment or deception.
- Maintain, where appropriate, the confidentiality of proprietary information, data, documents and records.

Analysis and Reporting

To be able to:

- Perform basic operational and data analysis i.e. the ability to do necessary computations and to understand proper relations between business rules and legal requirements for pesticide usage, wage computation and reporting.
- Verify the accuracy of collected information and be aware of the significance and appropriateness of the evidence collected to support the findings and conclusions of the third-party verification.
- Prepare well-documented third-party verification reports with clear analysis and specific evidence to support conformity / non-conformity findings.

2.3 Supporting verifier qualifications and competencies

- Always carry out verification activities under the supervision of a Better Cotton qualified Lead Verifier.
- University degree in agriculture, natural resources, environmental management or other relevant subject is encouraged but not required. Experience may substitute for education.
- Trained by a qualified Lead Verifier on the Better Cotton Principles and Criteria and attend additional training provided by Better Cotton.
- Describe the intent and requirements of the Better Cotton Principles and Criteria.
- Demonstrate an understanding of how the Better Cotton Principles and Criteria apply to the local context to the Lead Verifier’s satisfaction.
- Desirable: Trained in auditing principles, procedures, techniques and behaviours as described in ISO 19011.

2.4 Third-Party Verifier Organisation Responsibilities

- Report findings in a timely fashion, in English, using the reporting document prescribed by Better Cotton.
- Commitment to maintain accountability for information gathered from the verification process and implementation of the commitment.
- Ensure the competency and ongoing training of their verifiers.
- Ensuring a qualified Lead Verifier leads the third-party verification and that other verification team members are effectively supervised by them.
3. **Application procedures**

The application procedure for prospective Lead third-party verifiers seeking Better Cotton approval is made of **4 different steps**:

1. Send in the completed verifier application form (new verification companies complete Annex 1; adding new verifiers to already approved companies complete Annex 2)
2. Participate in an interview with Better Cotton & complete Competency Self-Declaration
3. Participate in Better Cotton training for verifiers as required and address any conditions required by Better Cotton prior to approval then successfully pass the verifier assessment at the end of the training program
4. Be shadowed by a Better Cotton staff member, or qualified Strategic Partner, on the first assessment conducted as the Lead Verifier

### 3.1 Verifier application form

The first step for a prospective verifier is to submit the applicable Better Cotton verifier application form (Annex 1 or Annex 2). Supporting documents (e.g. curriculum vitae, evidence of prior monitoring/verification work, evidence of approval/accreditation by other multi-stakeholder initiatives, etc.) must be provided together with the application form for review by Better Cotton.

### 3.2 Interview

After submitting the written application, Better Cotton staff will review the application and, provided the application meets the evaluation criteria, the technical manager, or equivalent of a verification organisation, and proposed lead verifiers will need to be available for interviews (phone or face-to-face) with Better Cotton staff. The Better Cotton Principles and Criteria and Better Cotton third-party verification methodology will be discussed in an oral interview with each applicant. The interviewers will be looking for evidence of the core competencies required of third-party verification organisations and verifiers described above and a commitment to the social and environmental goals of the Better Cotton Initiative. The interview will last between 30 minutes and one hour.

Prospective Lead Verifiers will also complete a Qualifications & Competencies Self-Declaration Form. Third Party Verifier Organisations should ensure that this form is filled in accurately for each one of their Lead Verifiers by checking all the boxes for those qualifications and competencies which are met. Where any gaps are identified, training plans or other mechanisms should be put in place to ensure that the Lead Verifiers meet all the Qualifications and Competencies before the Organisation will be eligible to be contracted to undertake a verification visit.

Better Cotton may also approach other stakeholders knowledgeable about the verifiers for references in addition to those listed by the verification organisation on their application form.

### 3.3 Better Cotton verifier training program

Individual verifiers or verification companies with the relevant competencies, personal attributes, and supportive references will be invited to participate in the Better Cotton verifier training organised by Better Cotton.
The training program for verifiers is made of 2 components:

1. **A training workshop** focused on the standard version 2.1. Individual lead verifiers, and supporting verifiers if requested, participate in a 2-day "New Verifier" training delivered by Better Cotton (at their own cost in the case of in person training). In addition to this initial training, it is obligatory for lead verifiers to attend an additional refresher training delivered annually by Better Cotton before conducting third-party verifications in a given year.

2. **An online assessment.** Following the workshop, an online assessment with questions on the topics covered will need to be passed by all Lead Verifiers before they can undertake third party verifications.

### 3.4 Shadow Visits

Lead Verifiers must be shadowed by Better Cotton staff, or approved Strategic Partners, during the first Better Cotton assessment conducted as the designated Lead Verifier. The Lead Verifier will be assessed for the duration of the assessment for assessment planning, interview techniques, knowledge of Better Cotton Principles & Criteria, knowledge of local conditions, documentation skills, communication, and report writing. This shadow assessment must be conducted during an in-person assessment.\(^1\)

### 3.5 Supporting Verifiers

Lead verifiers may require support to conduct assigned assessments in a thorough and timely manner. Verification team members in addition to the Lead Verifier will be considered Supporting Verifiers, the qualifications for which are outlined in section 2.3. All Supporting Verifiers must be registered with Better Cotton through the following steps:

- Send in completed Supporting Verifier Registration Form (Annex 3) including CV
- Attend Better Cotton third-party verifier refresher training as specified by Better Cotton or demonstrate proof of training on Better Cotton Principles & Criteria. Supporting Verifiers may be asked to successfully complete an online assessment to demonstrate knowledge of the Better Cotton Principles & Criteria at Better Cotton’s discretion.

### 4. Approval

Verification organisations who have successfully completed the application process, addressed any additional conditions stipulated by Better Cotton, had their Lead Verifiers attend the training workshop and passed the online training assessment, will be eligible to conduct third-party verification visits on the Better Cotton Principles and Criteria.

Approval will be granted for a period of **3 years** with the verification organisation being subject to periodic review during that period and also required to take further training as detailed below. If an approved Lead Verifier does not conduct assessments for Better Cotton for two consecutive seasons, their first assessment after this gap will be shadowed by Better Cotton.

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\(^1\) In exceptional circumstances, this requirement may be revisited by the Assurance Manager.
The list of approved verification organisations (including logo, name, contact information) will be posted on the Better Cotton website, noting the relevant country or region in which the verifier is approved to conduct third-party verification visits. Approved verification organisations may then be contracted by Better Cotton, Better Cotton Strategic Partners, or by eligible cotton-producing farms directly.

4.1 On-going Training Provided by Better Cotton
Better Cotton will deliver periodic (typically annual) trainings for third-party verifiers which will serve to refresh knowledge of Better Cotton Principles & Criteria and Assurance processes. It is obligatory for Lead Verifiers to attend these refresher trainings to be considered eligible to conduct Better Cotton assessment in a given year.

4.2 Training Programme
Verification organisations will need to implement an on-going training programme to ensure that all verifiers meet the Qualifications and Competencies requirements. Better Cotton staff reserve the right to conduct a review of this programme as needed. Particular attention will be focused on the training material used, the qualifications of the trainers, the length of the training, and the frequency with which training is conducted, as well as on-going performance monitoring to ensure that trainees are competent to carry out third party verifications. Verification organisation are directly responsible for verifier competency and performance.

5. Review and re-approval

5.1 Review
Periodic reviews of verifier performance will be undertaken by Better Cotton, based on feedback from Better Cotton country and assurance staff, partners and the external oversight process. This will include feedback on the quality of the verification visits undertaken in the field and the reports submitted. If necessary due to poor performance, Better Cotton will issue Performance Reviews to verifiers requiring corrective actions before additional visits may be conducted by the verifier.

Verifiers may also be subject to shadow verification visits by Better Cotton or designated external consultants to provide additional feedback to help inform the review. A shadow verification is a visit conducted by the verifier in the presence of a Better Cotton staff member or designated consultant observing how the different components of a third-party verification visit are performed by the verifier (conducting interviews with farmers, workers, documentation review, interview with management, or visual inspection of the farm).

Written feedback will be provided to the verifier by Better Cotton after each shadow verification visit and a corrective action plan will be required in response to address any issues identified. Better Cotton staff may shadow a verifier as often as necessary to ensure implementation of the corrective action plan. Better Cotton staff may also request documentation from verifiers that the corrective action plan from the shadow verification has been implemented.

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Better Cotton (and its Strategic Partners in select countries) cover the cost of third-party verification for smallholder farms (up to 20 hectares) and medium farms (21 to 200 hectares). Large farms producing cotton on more than 200 hectares are responsible to pay for third-party verification themselves (in limited cases this is covered by Strategic Partners for large farms).
Verification organisations may be placed on probation or have their relationship terminated based upon one or more of the following criteria:

- Persistent poor quality of verification reports
- Persistent delays in submitting verification reports to Better Cotton
- Poor quality of verification in practice or unprofessional or inappropriate conduct, as assessed by Better Cotton or designated external consultants during shadow visits or based on feedback from PUs/ LFAs and other Better Cotton partners
- Lack of responsiveness and commitment to Better Cotton feedback and processes
- Turnover and/or relocation of staff
- Status of business relationship with the Better Cotton
- Status of contractual relationship with the Better Cotton

Whenever Better Cotton decides to place a verification organisation on probation or terminate the relationship based upon the above criteria, a formal communication shall be sent by the Better Cotton Training and Assurance Manager to the verification organisation informing them of the decision and the reason, allowing for an opportunity to respond within the timeline specified by Better Cotton.

Where Performance Review requiring corrective actions is issued, the organisation will need to provide details of the corrective actions to be taken and the timeline for implementation for approval by Better Cotton. In the event that the proposed corrective actions in the Performance Review are not approved, or implementation of an approved corrective actions are not met within the agreed timeline, Better Cotton reserves the right to terminate the relationship with the Verification Organisation. No further verification visits will be assigned to verifiers on probation until a corrective action plan has been implemented.

Where Better Cotton terminates the relationship with a verification organisation, the verification organisation’s name shall be removed from the Better Cotton website.

5.2 **Re-approval**

Verifiers will be considered for re-approval after a maximum of 3 years. Before making a decision on re-approval, Better Cotton will undertake a thorough review of each approved verifier using the review processes highlighted above. At this time the verifiers shall: (i) disclose to the Better Cotton any material changes since the original application that may affect their independence or qualifications under the criteria; (ii) If the review and re-approval is successful, a new agreement will be signed by Better Cotton and the verification organisation.

6. **Appeals**

Verification companies and verifiers have the right to appeal against Better Cotton’s decision not to approve them as Better Cotton Third Party Verifiers when they consider their application as fulfilling all the requirements.
To do so, they can email assurance@bettercotton.org, mentioning the company and/or the name of the prospective verifier and the rationale for appealing.

The Better Cotton Assurance team will review the appeal and revert within 10 working days. The Assurance team will first attempt at resolving the appeal directly. If unsuccessful, it will convene an appeal panel to look at the appeal and make an impartial decision.

All appeals will be addressed within a month of submission.

7. Complaints Against Verifiers

In the case of complaints against the conduct and/or performance of the third-party verifiers, producers have the option of initiating the Appeals Process if they feel a licence has been incorrectly refused. There is also the BETTER COTTON Grievance Management Process which can be activated by other Better Cotton members and stakeholders formally involved in Better Cotton to address concerns about verifiers.
ANNEX 1: APPLICATION FORM FOR VERIFICATION COMPANIES

Note to Applicants: Before completing this form, please be sure you have read, understood and agree to the application requirements for approval outlined in the Better Cotton approval procedures for verifiers.

I. Applicant Profile:

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<td>Countries/Region for which you are seeking approval:</td>
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II. Application Instructions

The purpose of this application is to provide the Better Cotton with an understanding of the applicant’s ability and capacity to satisfy the core competency requirements of Third-Party Verifiers outlined in the “Better Cotton Approval Procedures for verifiers” document. Information requested in this application must be provided on a country or region-specific basis for each country or region where the company, organisation, or individual is seeking approval. Additional information may also be included as attachments to this application.

1. Background of prospective verifier
   a. Please provide a brief history and description of your organisation, including the issues of focus and geographic scope of your activities.

Click or tap here to enter text.
b. If available, please attach an organisational chart.

2. Verification Activities and Experience
   a. Provide a detailed explanation of proposed or current verification activities by the organisation and/or the proposed verifiers in the country where approval is sought showing responsibilities, procedures and tools used (if any).
   b. Submit a written record of the proposed verifiers’ verification experience.
   c. Please attach examples of previous work that demonstrate verification, monitoring, reporting and communication capability, including, e.g. sample verification/monitoring reports, where possible with confidential content redacted if necessary.

3. Knowledge of local conditions
   a. In brief narrative form, provide evidence of your organisation’s and verifiers’ understanding of the local social and cultural conditions that may affect compliance with the Better Cotton Principles and Criteria, and affect farmers’ and workers’ ability to communicate with verifiers about compliance.

4. Knowledge of local laws and prevailing practices
   a. Describe your organisation’s and/or proposed verifiers’ knowledge of the relevant labour law and conditions in the country or region where you are seeking approval.
   b. Describe your organisation’s or proposed verifiers’ knowledge of the laws that are relevant to land use, land conversion, water use, water extraction, and registered pesticides for cotton; as well as conditions in the country or region where you are seeking approval.
   c. Describe the internal systems you have created to ensure that this knowledge remains accurate and current (i.e. a database of local laws, professional staff development, etc.).
5. **Consultation with local knowledgeable sources**
   
a. Provide information describing your organisation’s and/or proposed verifiers’ experience of consulting with local knowledgeable sources on cotton production practices, health and safety issues, workers’ rights issues; such as NGOs, civil society organisations, and/or academic institutions in the country or region where you are seeking approval.

   b. Please provide a list of the groups whom you have engaged and describe the nature of the consultation in the country where approval is requested.

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6. **Training**
   
   Provide details of both:

   a. The training programme undertaken by the proposed verifiers including:
      
      I. Auditing principles, procedures and techniques
      II. details of the training materials used
      III. Trainer qualifications
      IV. Length and frequency of the training

   b. The system in place for evaluating the competency of verifiers and monitoring their ongoing performance, including the member of staff responsible for this.

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7. **Quality Control**

   Provide details of:
a. the review process the organisation carries out on the initial findings of the verifier and the staff responsible for this review.

b. The procedures in place to ensure that confidential information is managed appropriately.

c. The procedures in place to ensure a review and continuous improvement in the implementation of the third-party verification process.

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8. Verifiers’ Qualifications and Competencies

a. Provide detailed professional information (e.g. CV or résumé) about all personnel involved in the verification process (limited to one page per person if possible).

b. In the table below, summarize specific background information that would demonstrate the competence of each individual to conduct Better Cotton Third-Party Verification and assess compliance with the Better Cotton Principles and Criteria (i.e. language skills, agriculture expertise, environmental expertise, specialised training or experience in child labour investigations, previous experience conducting farmer and/or worker interviews, previous experience working with Better Cotton projects, etc.)

c. Include a gender breakdown of the proposed verification team and note if they are proposed as a Lead Verifier or Supporting Verifier.

Please note that all Lead Verifiers will need to be able to communicate clearly in English both through the writing of the verification reports and in responding to queries that Better Cotton may have.

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9. Worker interview methodology  
   a. Provide a detailed explanation of methodology used in conducting confidential worker interviews and the proposed verifiers’ experience of implementing this.

10. Farmer interview methodology  
    a. Provide a detailed explanation of methodology used in conducting farmer interviews, in either or both smallholder and large farm contexts, as applicable and the proposed verifiers’ experience of implementing this.

11. References  
    a. Please submit three or more references that will help us to understand the credibility and competence of you or your organisation.
    b. Please be sure to include the names of individuals to contact, and if available, an email address and telephone number for each reference.

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12. Fees

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Note: A full Cost Proposal Form will have to be filled before Better Cotton decides on the attribution of each Verification Visit. Better Cotton will provide you with information about the location of the farms to be visited prior to asking you to prepare the Cost Proposal Form.
CERTIFICATION

I certify that the information contained in this Application and any attachments submitted as a part of this Application is true, complete and accurate.

Moreover, I will notify the Better Cotton of any incident, situation or material change to the information submitted in this Application that may affect the ability of (Name of the Organisation) to meet the approval criteria for Third-Party Verifiers, as outlined in the Better Cotton approval procedures for verifiers.

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ANNEX 2: APPLICATION FORM FOR NEW LEAD VERIFIERS FROM APPROVED VERIFICATION COMPANIES

Note to Applicants: Before completing this form, please be sure you have read, understood and agree to the application requirements for approval outlined in the Better Cotton approval procedures for verifiers. The purpose of this form is to register additional lead verifiers from verification companies which have been approved by Better Cotton.

I. Applicant Profile

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<th>Name of Verifier Applicant</th>
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<tr>
<td>Applicant Position</td>
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<td>Applicant Email</td>
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<tr>
<td>Company Name</td>
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<tr>
<td>Applicant’s Manager Name</td>
<td>Click or tap here to enter text.</td>
</tr>
<tr>
<td>Countries/Region for which applicant is seeking approval:</td>
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II. Application Instructions

The purpose of this application is to provide the Better Cotton with an understanding of the applicant’s ability and capacity to satisfy the core competency requirements of Third-Party Verifiers outlined in the "Better Cotton Approval Procedures for verifiers" document.

1. Background of prospective verifier
   a. Please provide a brief history and description of your qualifications and competencies as related to the role of lead verifier.

   Click or tap here to enter text.

2. Verification Activities and Experience
   a. Detail applicant’s verification experience including schemes and entities for which verifier has conducted audits or assessments
b. Please attach examples of previous work that demonstrate verification, monitoring, reporting and communication capability, including, e.g. sample verification/monitoring reports, where possible with confidential content redacted if necessary.

Click or tap here to enter text.

3. Knowledge of local conditions
   a. In brief narrative form share your understanding of the local social and cultural conditions that may affect compliance with the Better Cotton Principles & Criteria, and also affect farmers’ and workers’ ability to communicate with verifiers about compliance.

Click or tap here to enter text.

4. Knowledge of local laws and prevailing practices
   a. Describe your knowledge of the labour law and conditions relevant in the country or region where you are seeking approval.
   b. Describe your knowledge of the laws that are relevant to land use, land conversion, water use, water extraction, and registered pesticides for cotton; as well as conditions in the country or region where you are seeking approval.

Click or tap here to enter text.

5. Consultation with local knowledgeable sources
   a. Provide information describing your experience of consulting with local knowledgeable sources on cotton production practices, health and safety issues, workers’ rights issues; such as NGOs, civil society organisations, and/or academic institutions in the country or region where you are seeking approval.
   b. Please provide a list of the groups whom you have engaged and describe the nature of the consultation in the country where approval is requested.
Groups you have engaged | Describe nature of consultation
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6. **Worker interview methodology**
   a. Provide a detailed explanation of methodology used in conducting confidential worker interviews and your experience of implementing this.

Click or tap here to enter text.

7. **Farmer interview methodology**
   a. Provide a detailed explanation of methodology used in conducting farmer interviews, in either or both smallholder and large farm contexts, as applicable and your experience of implementing this.

Click or tap here to enter text.

8. **References**
   a. Please submit two or more references that can speak to your qualifications and competencies as well as performance as a verifier.
   b. Please be sure to include the names of individuals to contact, and if available, an email address and telephone number for each reference.

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Note: A full Cost Proposal Form will have to be filled before BETTER COTTON decides on the attribution of each Verification Visit.

CERTIFICATION

I certify that the information contained in this Application and any attachments submitted as a part of this Application is true, complete and accurate.

Moreover, I will notify the Better Cotton of any incident, situation or material change to the information submitted in this Application that may affect the ability of (Individual) to meet the approval criteria for Third-Party Verifiers, as outlined in the Better Cotton approval procedures for verifiers.

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ANNEX 3: REGISTRATION FORM FOR SUPPORTING VERIFIERS

Note to Applicants: Before completing this form, please be sure you have read, understood and agree to the application requirements for approval outlined in the Better Cotton approval procedures for verifiers, sections 2.3 & 3.4 in particular. The purpose of this form is to register Supporting Verifiers from verification companies which have been approved by Better Cotton.

I. Applicant Profile

<table>
<thead>
<tr>
<th>Name of Supporting Verifier</th>
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<tr>
<td>Applicant Title</td>
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II. Instructions

The purpose of this application is to provide Better Cotton with an understanding of the applicant’s ability and capacity to satisfy the core competency requirements of Supporting Verifiers outlined in the "Better Cotton Approval Procedures for verifiers" document, sections 2.3 & 3.4 in particular. The applicants CV must be shared along with the completed registration form.

1. Background of prospective verifier
   a. Please provide a brief history and description of your qualifications and competencies as related to the role of supporting verifier.

   Click or tap here to enter text.

2. Verification Activities and Experience
   a. Detail applicant’s verification experience including schemes and entities for which verifier has conducted audits or assessments

   Click or tap here to enter text.
CERTIFICATION

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