

BETTER COTTON PRINCIPLES AND CRITERIA REVIEW

DRAFT 1-0 - STANDARD

DECEMBER 2015

Contact: Gregory Jean

Email: gregory.jean@bettercotton.org

Introduction

Welcome to the on-line survey on BCI standard Principle and Criteria review!

As part of our standard development and revision procedures, BCI consults with stakeholders to ensure that revised standards reflect BCI International's strategic objectives, are based on producers' realities and meet traders, suppliers, manufacturers and investors' expectations. We invite you to participate in this first public consultation on the BCI Standard.

You are kindly invited to consult the Guidelines detailing how to efficiently provide you input [here](#).

Please submit your comment to gregory.jean@bettercotton.org between 02 December 2015 and 02 February 2016.

For further information, please contact BCI standard manager:

Gregory Jean

email: gregory.jean@bettercotton.org

T: +41 22 939 12 94

Information about you:

1. Please provide us with information about your organization so that we can analyse the data precisely and contact you for clarifications if needed. The results of the survey will only be presented in an aggregated form and all respondents' information will be kept confidential.

- » Name of your organization
- » Name of contact person
- » Email address of contact person
- » Country

2. What is your responsibility in the supply chain (if applicable)?

- ☐ Producer
- ☐ Ginner
- ☐ Brand
- ☐ Retailer
- ☐ Spinner
- ☐ Trader
- ☐ Licencee
- ☐ Other, please specify (e.g, advocacy group, NGO, Union)

3. Are you a BCI member?

- ☐ Yes
- ☐ No

4. If you are a BCI member please select your category

- ☐ Civil Society
- ☐ Retailer and Brand
- ☐ Producer
- ☐ Supplier and manufacturer
- ☐ Associate member

5. In your opinion, what sustainability aspects deserve special attention during the standard revision? How important are each of them?

- ☐ Crop protection
- ☐ Water efficiency and availability
- ☐ Soil health
- ☐ Biodiversity enhancement
- ☐ Fiber protection
- ☐ Decent work
- ☐ Management

Please explain you answer:

6. Please indicate your perception of the knowledge you have about Cotton production practices in general?

- ☐ Strong knowledge
- ☐ Moderately good knowledge
- ☐ Average knowledge
- ☐ Moderately weak knowledge
- ☐ Weak knowledge

7. Please indicate your perception of the knowledge you have about Better Cotton Initiative Principle and Criteria and their implementation?

- ☐ Strong knowledge
- ☐ Moderately good knowledge
- ☐ Average knowledge
- ☐ Moderately weak knowledge
- ☐ Weak knowledge

PREAMBLE

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Effective date

After approval of this Version, this section will include:

- Standard effective date
- Information on the phase in of the revised PPC
- Information on future reviews of the PPC

History and objectives of the Standard

BCI first published the BCI Production Principles and Criteria in 2010 as a global practice-based standard that form the global definition of Better Cotton. There is however a hierarchy between the Principles or between Criteria. The BCI Production Principles are the essential rules or elements of sustainable cotton production, and the Criteria provide the means of judging whether or not continuous improvement is efficiently sought by farmers.

While a broad range of sustainability issues are embedded in the standards, production options available to a farmer to address a particular issue will vary depending on specific conditions. The identification of appropriate better management practices and implementation techniques to best deal with these issues in a given situation is left to farmers and their partners to meet the BCI Production Principles and Criteria.

To be licensed to grow Better Cotton, farmers must first reach a set of Minimum Requirements. Minimum Production Criteria, Management Criteria and reporting on Results Indicators are all part of the Minimum Requirements. Minimum Requirements are just the first stage, as farmers are also encouraged to develop further through Improvement Requirements.

Minimum requirements share equal status, validity and authority, and apply jointly and severally at the level of the Production Unit to get BCI licence. However improvement

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requirements are designed for the purpose of continuous improvement and need to be applied accordingly.

The objective of this Standard is to provide a set of Principle, criteria and indicators (PCI) that aim to:

- Detail prescription and guidance related to sustainable cotton production according to BCI mission and objectives;
- Improve the consistency of BCI Production Principle and Criteria interpretation; notably by assisting BCI implementing partners interpret the Production Principles and Criteria and help them explain to cotton farmers both the importance of addressing the issues covered by the Better Cotton Production Principles and Criteria, and the practical implications of growing Better Cotton;
- Support other audiences interested in Better Cotton, such as retailers, ginners, spinners, traders, NGOs, trade unions, producer organisations and large independent cotton farmers, to better understand the Better Cotton Production Principles and Criteria;
- Ensure the consistent implementation of the Principle and Criteria at global level;
- Improve and strengthen the credibility of the BCI System;
- Support a more efficient local applicability of standards

Regarding 2015 Revision:

The BCI Principles and Criteria were originally published in 2010, and amended in 2013. This version is a result of a comprehensive review and revision of the Principles and Criteria that commenced in February 2015.

This version of the BCI Principles and Criteria has been developed and revised in accordance with:

- BCI-PRO-01 V2 "BCI Standard Setting and Revision Procedure".

This procedure was, in turn, developed in compliance with:

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- ISEAL Code of Good Practice for Setting Social and Environmental Standards (Public Version 6-0, December 2014).

and under the guidance of:

- ISO/IEC Guide 59 Code of Good Practice for Standardization (February 1994).

Question 1:

Do you agree with all aspects presented in the “History and objectives” sections?

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

Scope

The Principles and Criteria cover all of The Producer's production and management activities that are related to the Production Unit.

In terms of geographical space, the BCI Principles and Criteria apply generally to the entire geographic space inside the boundary of the Production Unit which is being submitted for licencing. However, some of the Principles and Criteria apply beyond the boundary of the Production Unit.

The Principles and Criteria are globally applicable to all types and scales of cotton production types defined in farmer category definition in the BCI assurance document.

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Areas within the geographic boundary of the Production Unit which are not for cotton production systems are not subject to the Principles and Criteria, unless they are covered by prescriptions in the management plan.

In terms of products and services, the BCI Principles and Criteria only cover the production of cotton. In terms of the law, underpinning the Production Principles and Criteria is the fundamental premise that growing Better Cotton respects national and other applicable law. Cotton producers should always abide by national legislation, unless that legislation sets standards which are below the referenced internationally recognised standards and conventions, in which case, the international standards prevail. However, where national legislation sets higher requirements on a specific issue than these standards, then national legislation shall apply.

Referenced publications

The following referenced publications are indispensable for the application of this document.

For references without a version number, the latest edition of the referenced document (including any amendments) applies.

3.1 - ISEAL Code of Good Practice for Setting Social and Environmental Standards (v. 6.0)

3.2 - BCI-ADV-01-V2 "Better Cotton Assurance Program", Nov 2013

3.3 - BCI-STD-01-V1 "Better Cotton Production Principle and Criteria", May 2013

3.4 - BCI-PRO-01-V2 "Better Cotton Standard Setting and Revision Procedure", Jan 2014

3.5 - BCI-PRO-02-V1 "Approval Procedures for verifiers"- Date unknown

Proposed version of P&C is also modelled on former normative verification documents:

3.6 - BCI-STD-02-V1 "Better Cotton Performance Scale for Smallholders, Nov 2013

3.7 - BCI-STD-03-V1 "Better Cotton Performance Scale for Medium Farms, Nov 2013

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3.8 - BCI-STD-04-V1 "Better Cotton Performance Scale for Large Farms, Nov 2013

Question 2:

Do you agree with "Scope" section content?

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

Question 3:

In the Predraft, climate mitigation and adaptation requirements are represented by "themes" scattered in Soil and Water principles. Do you agree with this way of doing, otherwise how do you recommend to address "Climate mitigation and adaptation" aspects in the revised version of the standard?

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

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Question 4:

There has been request from standard users and observers on the need to further describe requirements and provide more guidance on how to correctly implement BCI standards.

There are two ways to deal with this demand:

- Option 1: Develop additional indicators providing more descriptive elements on what is required to comply with the related criterion
- Option 2: Provide more guidance for implementation and give more explanation on what is required

Principle 6 in the Predraft has been used to test option 1 here above, notably with criterion 6.3.

Between both options proposed above which one do you think is the most appropriate to help users to comply with BCI standards?

Option 1 ☐

Option 2 ☐

I don't have an opinion ☐

Please explain your Answer:

Responsibility for compliance

Responsibility for ensuring compliance with the BCI Principles and Criteria lies with entity(ies) that is/are the licence holder. For the purpose of Better Cotton Standard System implementation, these person(s) or entities are referred to as 'The Producer'. The Producer is responsible for decisions and production/management activities related to the Production Unit. The Producer is also responsible for demonstrating that other persons or entities that are permitted or contracted by The Producer to operate in, or for the benefit of the Production Unit, comply with the requirements of the BCI Principles and Criteria.

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Accordingly, The Producer is required to design and implement corrective action plans in case such entities not being in compliance with the Principles and Criteria.

Rationale for change

It is a best practice in internationally recognized best practices for setting standards to introduce the scheme normative framework through a certain number of key elements such as the ones mentioned in this Preamble section.

Question 5:

Do you agree on the decision to group all the management criteria that currently exist in the BCI performance scales into a new 7th Principle entitled "BCI cotton farmers operate a management system"?

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

PREAMBLE

GENERAL COMMENT:

Do you have any other general or specific comment to make on the Preamble?

Yes ☐

No ☐

If yes, please develop:

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PRINCIPLE 1 – CROP PROTECTION

PRINCIPLE 1 - BETTER COTTON IS PRODUCED BY FARMERS WHO MINIMISE THE HARMFUL IMPACT OF CROP PROTECTION PRACTICES

Introduction to the Principle:

Cotton is attractive to a range of pests, and subject to diseases and weed infestations. A range of techniques is available for their control and management: this includes the use of bio-control agents, pheromones and hormones; plant breeding and appropriate cultivar selection; various cultural and mechanical techniques; the application of conventional pesticides (both natural and synthetic) and more recently, the use of genetically modified plants.

However, the use of synthetic pesticides is a dominant form of crop protection. Given this dominance, and that inappropriate or improper use of pesticides can adversely affect human health, contaminate water sources, food crops and the environment generally, the focus of the Criteria under this Principle is two-fold:

1. The adoption of Integrated Pest Management and an emphasis on the use of pest control techniques other than pesticide application, in order to reduce reliance on pesticides. As well as the risks associated with pesticide use, over-reliance has led to pest resistance, disruption to populations of natural pest enemies and secondary pest outbreaks, all of which make crop protection more difficult and expensive;
2. The use of practices that minimise the potential harmful effects of pesticides.

As a mainstream initiative, BCI will work with all farmers, including those who choose to grow transgenic (also GM, biotech) cotton varieties, such as Bt cotton. BCI has adopted a position of being 'technology neutral' with respect to transgenic cotton. This means that BCI will neither encourage farmers to grow it, nor seek to restrict their access to it, provided it is legally available to them. The focus is on enabling farmers to make informed choices about the available technologies to use, and how to use them appropriately. BCI encourages informed decision making at the farm level, to change practices that ensure improved outcomes - environmentally, socially and economically.

PRINCIPLE 1 – CROP PROTECTION

Integrated Pest Management

CRITERIA 1.1

The Producer must **adopt** an Integrated Pest Management Programme ~~is adopted~~ that includes **all of** the following principles:

- i. growing of a healthy crop; and
- ii. prevention of build-up of pest populations and of the spread of disease; and
- iii. preservation and enhancement of populations of beneficial organisms; and
- iv. regular field observations of the crop's health and key pest and beneficial insects; and
- v. management of resistance.

Intent

The objectives and benefits of implementing IPM include:

- Reduced use of pesticides and associated levels of human and environmental toxicity, and the subsequent reduced risk to human health and the environment.
- Use of a wider range of control techniques and reduced reliance on a single method of pest control, leading to a more resilient approach to crop protection and better control of input costs.

INDICATORS

- 1.1.1 The Producer Unit has a locally adapted and time-bound plan based on agro-ecosystem analysis that ~~provides~~ identifies the appropriate specific practices to implement the 5 principles of Integrated Pest Management.



PRINCIPLE 1 – CROP PROTECTION

Integrated Pest Management

1.1.2 An Integrated Pest Management Programme is implemented that includes all of the following principles:

- I. growing of a healthy crop; and
- II. prevention of build-up of pest populations and of the spread of disease; and
- III. preservation and enhancement of populations of beneficial organisms; and
- IV. regular field observations of the crop's health and key pest and beneficial insects; and
- V. management of resistance.



1.1.3 There is no calendar or random spraying.



Rationale for change:

This minimum indicator, previously specific to SH, is extended to MF and LF in order to clarify that there shall be no random or calendar spraying also in MF and LF. This was previously implied with the requirement for MF and LF to adopt of a full IPM program – incompatible with random or calendar spraying - but some stakeholders erroneously interpreted that the criteria was stricter for SH than for LF.

1.1.4 Estimated number of farmers adopting the 5 principles of IPM, in accordance with the list of practices defined in the locally adapted and time-bound plan



1.1.5 Timeline against which 100% adoption on the 5 principles of IPM is expected to be achieved within

PRINCIPLE 1 – CROP PROTECTION

Integrated Pest Management

Guidance for implementation:

Rather than being a specific set of rules, IPM is better considered as the fundamental guiding approach to how cotton farmers should protect their cotton crop from the many and varied pests attracted to it. The principles that underpin an IPM Programme should include:

- *The interests of, and impacts on, producers, society and the environment are taken into account in the choice of crop protection techniques, such as the potential health and environmental impacts of pesticide use, and the need to manage genetically-modified varieties to prevent resistant insect and/or weed populations, and the risk of cross-fertilisation of any neighbouring cotton that is not genetically modified.*
- *A range of pest control strategies should be used in an integrated manner, with no single strategy (particularly pesticide application) being overly relied upon, and that both preventative and curative measures are used.*
- *The presence of pests should not automatically lead to control measures being applied.*
- *When control of pests becomes necessary, non-chemical pest control methods should be considered first; the use of pesticides (especially those with broad-spectrum activity) should be seen as a last resort.*

An IPM program is built, implemented, and improved over time, reflecting the progress that farmers make in their knowledge and performance. This is very much in line with the concept of continuous improvement. BCI expects all Better Cotton farmers to understand the objectives of IPM, and to be knowledgeable about its 5 components. Large and Medium Farms are expected to be able to demonstrate the analysis of issues or the implementation of practices related to all 5 components - all combined under a comprehensive and operational IPM program. Producer Units of smallholders are expected to draft a comprehensive IPM plan that addresses all 5 components, and progressively put in place appropriate practices under a time-bound plan.

Some practices however are incompatible with the IPM approach as a baseline, such as the use of pesticides that are not legally registered for use on cotton, or the spraying of pesticides on a random basis or on a calendar schedule. This implies that every Better Cotton farmers must have the capacity, on an individual basis or through expert support, to trigger their pest management decisions based on a minimum level of field observations and analysis, and based on such concepts as economic thresholds for pest or predator to pest ratio. Pesticides application that does not follow this concept must be considered a non-compliance. In exceptional circumstances, farmers may spray pesticides at a date (relative to the crop cycle) that has been previously scheduled. For example, an early season, scheduled, “prophylactic” insecticide spray can be considered acceptable, as long as this is triggered by an official recommendation from a credible research body. This may occur in case a risk of early pest or disease infestation exist, which can be difficult to address in a timely manner after scouting and threshold assessment, and in the absence of any other effective alternative prevention methods. Furthermore, there are theoretical examples where, following up on an initial treatment triggered by observation, a 2nd spray could be implemented at a set interval (therefore “scheduled”), following a specific recommendation. These exceptional cases are only acceptable if producers are able to refer to official recommendation that builds on credible, recent, and locally-relevant research, and if all other decisions to spray chemical pesticides are effectively based on field observation and in accordance with the producers’ IPM plan or program. Producers should also be able to demonstrate that alternative control methods are being investigated – either by the research body emitting the recommendation, or by themselves.

PRINCIPLE 1 – CROP PROTECTION

Integrated Pest Management

Question 1:

BCI bans the use of pesticides which are not nationally registered to use on cotton, as well as those listed in the Stockholm Convention (POPs). BCI also asks for a phase out of pesticides listed in the Rotterdam Convention (PICs) as well as those classified as Highly or Extremely hazardous (WHO 1a/b toxicity) - but only as an improvement requirement. Is there a need to develop a stricter and/or more sophisticated restriction approach, for example towards the elimination of Highly Hazardous Pesticides (HHP's)?

Your Answer:

PRINCIPLE 1 – CROP PROTECTION

Integrated Pest Management

CRITERIA 1.2

The Producer may only use pesticides that are:

- (i) Registered nationally for the crop being treated; and
- (ii) Correctly labelled in the national language.

Intent

The use of pesticides can pose risks to humans, animals and the environment. Different types of pesticide carry different types and degrees of risk that need to be taken into account. It is therefore important to understand the specific risks associated with each particular type of pesticide so that appropriate precautions can be taken. The labels provided with legally registered pesticides contain important information regarding the properties of the product being used, directions for use and the precautions and measures that should be adopted when using it, all of which need to be followed. The label should contain information on: the type of application equipment and protective equipment that should be used; the appropriate rate and volume of water to be used; any restrictions on use; first aid information; the crop(s) the product is registered for, product compatibility and container disposal requirements. Further information on these matters is available from the product Material Safety Data Sheet (MSDS).

Registration of a particular pesticide for a crop indicates that the relevant regulatory authority has assessed the risks associated with using the pesticide on the crop(s) it has been registered for, and that suitable, crop-specific directions for use have been developed. In particular, the rate (volume per unit area) at which a pesticide is to be applied, and any withholding period (the time that must be allowed to elapse after the application of a pesticide before the crop can be harvested) that must be observed, will be influenced by the crop being treated. Use of a pesticide on a crop for which it is not registered – especially food crops – increases the risk of pesticides entering the food chain, as the appropriate application rates and withholding periods will not have been determined. Lack of registration may be due to a decision that the pesticide should not be registered for the crop.

Furthermore, high application rates may damage the crop or result in unacceptably high residues, while rates that are too low may be ineffective and lead to the development of pest resistance..

PRINCIPLE 1 – CROP PROTECTION

Integrated Pest Management

INDICATORS

- 1.2.1 All pesticides used are registered nationally for the use on cotton.
- 1.2.2 All pesticides used are correctly labelled in the national language.



Guidance for implementation :

For the purpose of this criteria, the term pesticide includes insecticides, herbicides, fungicides and acaricides, growth regulators, defoliants, conditioners and dessicants, as well as bio-pesticides. No distinction is made between synthetic or natural substances that are applied for any of these purposes.

Question 2:

In relation to "No distinction is made between synthetic or natural substances that are applied for any of these purposes" (Guidance for implementation). Is it appropriate to require that any natural substances used as a pesticide (e.g. a pest repellent natural substances) be "registered for use and properly labelled"?

Please explain your answer:

PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

CRITERIA 1.3

The Producer must not use any pesticide listed in

- (i) **annex A and B of the Stockholm Convention or;**
- (ii) **annexes of the Montreal Protocol.**

Intent

Chemicals listed under the Stockholm Convention on Persistent Organic Pollutants (POPs) as well as substances listed in the annexes of Montreal Protocol on Substances that Deplete the Ozone Layer (a protocol of the Vienna Convention for the Protection of the Ozone Layer) poses unacceptable levels of hazards to human health or the environment and are to be eliminated from use in agriculture. From the moment a substance is established to meet the parameters of these conventions and are listed in their respective annexes, Better Cotton farmers shall not use them.

INDICATORS

1.3.1 No Pesticides listed in:

- i. **Annex A and B of the Stockholm Convention or;**
 - ii. **Annexes of the Montreal Protocol;**
- are not used.**



Rationale for Change:

The Montreal protocol entered into force in 1989 in order to protect the ozone layer by phasing out the production of numerous substances that are responsible for ozone depletion. Among these, only one substance is used as a pesticide: Methyl Bromide. It is customary in voluntary standard systems to address the three international conventions which seek the restriction of chemicals that have been assessed to pose particularly high levels of hazards on human health or the environment. Adding the Montreal Protocol (part of the Vienna Convention for the Protection of the Ozone Layer) to the Stockholm and Rotterdam conventions already addressed in version 1 of BCI PPC brings coherence.

PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

Guidance for implementation :

A list of substances ~~currently~~ listed in the Stockholm Convention and the Montreal protocol as of [month of publication] is provided as Annexure 1. However, The Producer is responsible to remain current with the most updated version of the list.

PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

CRITERIA 1.4

The producer must have a plan to phase out the use of any ~~Use of~~ pesticide:

- (i) **listed as WHO ~~list~~ Class 1a (extremely hazardous) and 1b (highly hazardous); or**
- (ii) **~~those~~ listed in Annex III of the Rotterdam Convention,**

with the timeline based on the availability of better alternatives and ability for the risk to be properly managed.

Intent

BCI considers that it is in the interest of both the health of the farmer and the farming community, and of the environment, for there to be a reduction in the total toxicity of the pesticides applied to the crop. One method for reducing the total toxicity is to restrict access to certain types of pesticides, based on their toxicity. As FAO notes, restricting access to certain toxic pesticides, such as WHO Class I “may be desirable if other control measures or good marketing practices are insufficient to ensure that the product can be handled with acceptable risk to the user.”

However, BCI recognises that a blanket restriction on the use of a range of generally available pesticides may not be able to take into account either:

- The specific and immediate local impacts of such a restriction. For example, will a farmer have access to alternative products?
- The degree of risk associated with using the pesticide in different regional contexts, i.e. regions with access to different technologies will have differing abilities to minimise the risks associated with applying pesticides. Again, as noted by FAO: “Pesticides whose handling and application require the use of personal protective equipment that is uncomfortable, expensive or not readily available should be avoided, especially in the case of small-scale users in tropical climates”..

INDICATORS

- 1.4.1** Frequency at which pesticides listed in WHO Class 1a and 1b and Annex III of the Rotterdam Convention are used on the farm or in the Producer Unit. If applicable, under which timeline is the phasing out of these chemicals planned to occur



PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

CRITERIA 1.5

The Producer must ensure that any person who prepare and apply ~~by persons who~~ pesticides are:

- (i) Healthy; and
- (ii) Skilled and trained in the application of pesticides; and
- (iii) 18 or older; and
- (iv) not pregnant or nursing.

Intent

Given the hazards associated with pesticide use, it is important that the people who use them are both healthy and trained. Workers who are not healthy, for example who are fatigued or sick, are more likely to have an accident than workers who are healthy, while workers with illnesses — especially liver or kidney diseases — may be more at risk. Equally, workers with open wounds have an increased risk of pesticides entering their body through the wound.

Farmers and workers need to be provided with the information and training they need to perform their work safely and without risk to their health. This leads to understanding about the extent of the hazard, associated risks, why risk controls are used and how to manage the risks. Training enables people to work more safely in the context of the hazards that are the focus of the training. The specific content of training is situation-specific and should be formulated in view of the local context.

People under the age of 18 should not apply pesticides as pesticide application is work 'which by its nature ... is likely to harm their health' and therefore classified as hazardous child labour ~~(see relevant page in the decent work section for a more complete discussion on Hazardous Child Labour and Child Labour in general)~~. Reasons for restricting the application of pesticides to people aged 18 and older include the physical nature of pesticide application, and the increased risk of fatigue, injury and poisoning for young workers, and also the likelihood that personal protective equipment, being designed for adults, may not fit properly and therefore not work properly — if it is used at all.

Pregnant and nursing women should not be involved in pesticide application, given the greater risks associated in exposing their developing foetus or nursing child to pesticides. Unborn and young children may be especially sensitive to pesticides for a number of reasons: the development of the foetus' nervous system may be adversely affected; young children do not have the same ability to detoxify pesticides, and their lower body

PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

weight makes them more susceptible than adults to the adverse effects of pesticides. As a woman may not be aware that she is pregnant in the early stages of her pregnancy, the ideal situation would be that women of child-bearing age do not apply pesticides at all.

INDICATORS

1.5.1 All persons who prepare and apply pesticides are:

- i. Healthy; and
- ii. Skilled and trained in the application of pesticides; and
- iii. 18 or older; and
- iv. not pregnant or nursing;



PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

CRITERIA 1.6

The Producers must ensure that any person who prepare and apply pesticides always use appropriate protective and safety equipment in a correct manner.

Intent

Pesticides can enter a person's body through a person's mouth (oral), their skin (dermal), or breathing (inhalation). The risk of entry will be affected by the formulation of the pesticide (e.g. liquid or dust), and how it is handled. Oral ingestion can result from eating or smoking while working with pesticides, from mistakenly consuming a pesticide stored in a food or drink container, from not washing hands thoroughly after working with pesticides or through use of a pesticide container for household purposes. Dermal absorption is a major route of poisoning, and can occur during handling, mixing and loading of pesticides, as well as during application, for example as a result of a leaking backpack applicator. Inhalation of pesticide dust and spray droplets can also occur during mixing and application.

The use of personal Protective Equipment (PPE) should be seen as the last resort to protecting applicators from pesticide exposure. The best method is to remove the source of risk: that is, not to use the pesticide in the first place. Adoption of an IPM programme can assist in making use of pesticides a last resort. If a pesticide application is required, consideration then needs to be given to selecting one that poses the least risk to the user. For example, through choice of the less hazardous active ingredient, or choice of the least hazardous formulation for a given active ingredient. Preventing applicators being exposed to pesticides is essential for managing the risks of acute or chronic health injuries. The label should contain information on the appropriate protective and safety equipment to be used, based on the risks posed by the pesticide.

Where PPE is used to control risks associated with pesticides, it is essential that certain conditions be met in order for it to be effective. It should correctly fit each wearer and users need to understand how and why to use it. All PPE should be readily available, functional and correctly maintained and cleaned.

INDICATORS

- 1.6.1 Estimated number of farms where pesticides are prepared and applied by persons who correctly use appropriate protective and safety equipment



PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

- 1.6.2 Pesticide labels are checked regularly (at least every spray season) to ensure that the appropriate PPE is available for the pesticides being used?
- 1.6.3 Frequency at which PPE is checked for wear and tear, and replaced if required.
- 1.6.4 All staff who work with pesticides have received training on safe work procedures and the maintenance, use and proper storage of PPE.
- 1.6.5 Frequency at which refresher training on safe work procedures and the maintenance, use and proper storage of PPE is provided.



Guidance for implementation:

To be completed

Question 3:

Is there a need for more guidance about what constitutes "appropriate" PPE, and/or what constitute "correct use"? Is there a need to differentiate between "appropriate" PPE (which in many circumstances present severe feasibility challenges) and "basic or minimum" PPE (which is proposed in this draft as a minimum requirement)?

Please explain your answer:

PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

CRITERIA 1.7

The Producer must ~~are~~ store, handle and clean Pesticide application equipment and containers so as to avoid environmental harm and human exposure.

Intent

Pesticide containers are a source of risk to the environment and human health, and appropriate storage will help to minimise this risk. What is appropriate will be affected by both the quantity and type of pesticide being stored. The local context will also strongly influence the storage options available to a farmer. Ideally, pesticides would be purchased only in the amounts required for immediate use, and used as soon as they are purchased so that the need for storage by the farmer is eliminated. However, it is recognised that this may not always be possible or practical.

INDICATORS

1.7.1 Estimated number of farms with separate and safe storage & cleaning sites available



1.7.2 The farm has dedicated areas for the storage, mixing and handling of pesticides, and for cleaning of pesticide containers and application equipment that fully complies with the relevant legislation for storage, handling and disposal of pesticides and ensures that all rinsate and run-off is completely captured and poses no contamination risk.



1.7.3 Frequency at which application equipment is inspected and cleaned.

PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

Guidance for implementation:

If pesticides need to be stored, they should be stored separately from all other substances, and the storage should protect the containers from the weather, to minimise the risks of the containers corroding or the pesticide degrading. Storage also needs to be in a secure and well-ventilated area so that they are protected from unauthorised access, and so that fumes do not pose a risk.

Pesticides should never be stored in drink or food containers. If it is necessary to store a pesticide in a container other than its original container, then the container must be clearly and appropriately marked.

Mixing and cleaning of pesticide containers and application equipment should be undertaken only while wearing appropriate personal protective equipment, and away from sensitive areas, especially water bodies and water courses, so that any run-off drains away from water bodies. Applicators should not eat, smoke or drink while applying pesticides, or when handling and cleaning containers and application equipment, and should have access to appropriate facilities for washing hands and changing clothes after handling or spraying pesticides.

PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

CRITERIA 1.8

The Producers must apply pesticides in appropriate weather conditions, according to label directions, and/or manufacturers' directions, with appropriate and well-maintained equipment.

Intent

The risk of off-target movement of pesticides is related to both the prevailing weather conditions, and the suitability of the equipment used to apply the pesticide. Temperature affects the rate of evaporation, and high rates of evaporation may result in a reduced droplet size for water-based formulations, leading to an increased risk of drift (small droplets are more likely to drift off-target than large droplets).

Leaks in application equipment pose a threat to the applicator and the environment, and worn parts may result in incorrect application rates and less effective treatment.

INDICATORS

1.8.1 Estimated number of farms applying pesticides in appropriate weather conditions, according to label directions with appropriate and well-maintained equipment.



1.8.2 The farm has a formal plan for conducting pesticide application that details, at a minimum, the following:

- Requirements for compliance with the label requirements
- The relevant weather conditions under which applications will and will not be undertaken for each field (including wind direction and taking into account the pesticide being applied), spray parameters (e.g. speed, pressure, nozzle size, spray volume, boom height etc.), and all relevant sensitive areas, which are clearly identified on a farm map.



PRINCIPLE 1 – CROP PROTECTION

Pesticides Restriction

- 1.8.3 The farm has weather monitoring equipment that is used to monitor temperature, wind speed and direction and humidity prior to and during the application, with readings recorded.
- 1.8.4 The farm has procedures for ensuring that workers are aware of and observe re-entry periods for any treated areas.



Guidance for implementation :

Weather conditions to take into account are wind speed and direction, temperature and relative humidity, and atmospheric stability. Ideally, wind speed should be between 3 and 15 kilometres per hour (2 and 9 miles per hour), and blowing away from any sensitive areas. The application should be carried out in a crosswind, with the operator working into the wind towards the untreated area.

Application should not take place when rainfall is imminent. If it rains soon after application there is a real risk of off-site contamination (through the rain washing the recently-applied pesticides off the plant), and the efficacy of the application will be adversely affected.

As noted under Criterion 1.2, pesticide labels contain important information regarding the properties of the product being used, directions for use and the precautions and measures that should be adopted when using it, all of which need to be followed. The label should always be consulted for specific advice on appropriate weather conditions and application equipment.

Pesticides can be delivered in a number of forms (e.g. emulsions, wettable powders, granules), and can be applied with a range of equipment. Application equipment is designed and manufactured to be operated under certain parameters, and the equipment used needs to be appropriate to the form of the pesticide being applied. The equipment should also be in good condition, with no leaks or worn parts. Application equipment should be cleaned after each use, to reduce the risk of contamination, and to keep it in good working order.

PRINCIPLE 1 – CROP PROTECTION

Waste Management

CRITERIA 1.9

The Producer must dispose of used pesticide containers safely, or through a collection and recycling programme.

Intent

The focus of this Criterion is to prevent pesticide containers ever being used, either accidentally or intentionally, for any other purpose. Even if it is possible to clean containers to be free from residues, it is impossible to tell whether a container is clean or contaminated. Therefore this Criterion seeks to ensure that no pesticide containers are used for any household or other purposes, so as to reduce the risk of accidental poisoning through use of a contaminated container.

Used pesticide containers are also a potential source for environmental contamination, and proper disposal needs to reduce the risk of environmental contamination.

INDICATORS

1.9.1 Estimated number of farms that dispose of pesticide containers safely

1.9.2 All pesticide containers are triple-rinsed, with the rinsate added to the spray tank, or disposed of safely

1.9.3 Percentage of pesticide containers that are recycled.



PRINCIPLE 1 – CROP PROTECTION

Waste Management

Guidance for implementation :

The best disposal method will depend upon the nature of the packaging. Where possible, options for disposing of the container should be taken into account when making the decision to purchase a pesticide.

The label should contain advice on options for safe disposal. BCI recognises that many farmers may not have access to a container recycling or collection programme, and that external support will be important.

GENERAL COMMENT:

Do you have any other general or specific comment to make on this principle?

Yes ☐

No ☐

If yes, please develop:

PRINCIPLE 2 - WATER EFFICIENCY

BETTER COTTON FARMERS USE WATER EFFICIENTLY AND CARE FOR AVAILABILITY OF WATER

Introduction to the Principle:

Water is a major limiting factor in cotton production. While cotton is a relatively drought tolerant crop, farmers who use water efficiently can grow more crop with the same volume of water than farmers who use water inefficiently. And inefficient water use – such as over-watering and waterlogging – can directly decrease crop yield. Efficient water management helps maximise productivity, and minimise cotton's environmental impact.

Water is also used in the production of crops other than cotton, as well as in livestock watering, for human consumption and for recreation. The growth of the world's population is placing a dual pressure on farmers: at the same time as there is increasing demand for food and fibre, there is also increased competition from other users of water, meaning that farmers will be expected to produce more, from the same or even lesser amount of water. It is therefore incumbent upon cotton farmers to use water – a common and vital resource – responsibly.

Good water use efficiency means the crop uses as much of the water delivered to the farm as possible. It therefore requires that inefficiencies – water losses – be reduced. Inefficiencies include deep drainage, leaks and evaporation during storage and conveyance around the farm, evaporation caused by excessive cultivation, poor infiltration of rainwater and the non-recycling of tailwater.

Besides, it now impossible to overlook water scarcity aspects when it comes to agriculture especially in countries where cotton is grown and in the context of smallholders. This fundamental consequence of climate change is a major chapter of global strategy for adaptation. BCI as a sustainability initiative must embed this ambition within its standards. This can be done through water stewardship notably.

PRINCIPLE 2 - WATER EFFICIENCY

Water Use

CRITERIA 2.1

The Producer must adopt Water management practices that optimise water use

Intent

BCI's intention is that this Criterion applies to both irrigated and rain-fed cotton. The range of practices available to a farmer to optimise water use will be influenced by whether they rely on irrigation (and on how the irrigation water is delivered to the farm and the crop), rainfall, or a combination of both.

INDICATORS

- 2.1.1 Water management practices are adopted to optimise water use (applicable to both rain fed and irrigated cotton).



Guidance for implementation:

For rain-fed farms, optimising the use of water revolves around ensuring that water that falls on the farm can be captured on the farm and used by the crop. Use of cover crops, adopting a conservation tillage farming system, retaining crop stubble where possible, slowing the speed at which water flows across the farm (which will also help control erosion) and opportunity cropping are examples of ways to optimise water use. Note that capturing water on farm is subject to any local requirements to allow rainfall runoff to leave the farm.

For irrigation farms, optimising the use of water requires consideration of the range of issues noted above for rain-fed cotton farming, as well as the consideration of every stage of water movement, from the initial extraction of the water, to its application and use by the crop, to the recycling of any water that runs off the crop. Thus optimisation of water use includes good management of storage and delivery systems, as well as of the irrigation of the crop itself. Inefficient water delivery systems and irrigation practices waste water, and can result in salinisation of the soil and rising water tables.

The need to manage salinity should also be considered as part of optimising water use. While cotton is a relatively salt-tolerant crop, cotton grown in soils affected by salinity may suffer reduced yields, and will not use water as efficiently.

Salinity can be caused in two main ways. Irrigation – induced salinity occurs when the irrigation water contains an excess of salts, especially sodium chloride. Where salt levels in the irrigation water are high, salt will be left behind in the top layers of the soil after the water has been used by the crop, and over time will build up. Salinity can also occur when the amount of water entering the groundwater is greater than the amount leaving, and results in a rising water table. The rising water table mobilises salts stored in the soil, and through capillary action they are moved to the soil surface.

PRINCIPLE 2 - WATER EFFICIENCY

Water Use

CRITERIA 2.2

The Producer must adopt Management practices to ensure that water extraction does not cause adverse effects on groundwater or water bodies

Intent:

Although wording of the criterion 2.2 has not been changed, it is now suggested to require water management plan in related indicators. This suggestion stems from the will to increase sustainability ambition embedded in Principle 2 by switching from water efficiency to water stewardship.

Requiring a water management plan instead of simply requiring "good management practices" allows the farmer to adopt a structured approach towards the use of water.

Likewise, it is requiring adoption of a plan to Smallholders is already an important step towards water stewardship. It is expected however that Medium Farms not only designs and adopts this plan but also prove its implementation. For Large Farms, minimum best practices are explicitly spelled out and required.

INDICATORS

2.2.1. ~~Management practices~~ A water management plan is adopted to ensure that water extraction does not cause adverse effects on groundwater or water bodies in accordance with continuous improvement plan



2.2.2. ~~Management practices~~ A water management plan is implemented to ensure that water extraction does not cause adverse effects on groundwater or water bodies in accordance with continuous improvement plan



PRINCIPLE 2 - WATER EFFICIENCY

Water Use

2.2.3. Water extracted from groundwater sources is recorded and trends monitored

2.2.4. Use of groundwater complies with all formal requirements



Guidance for implementation:

The water management plan should be composed of:

- Ensuring that the use of water does not result in adverse impacts on other users.
- Avoiding contamination of surface and ground water through run-off of soil, nutrients or chemicals, or as a result of inadequate disposal of waste

Groundwater withdrawals need to take into account other users, and must be sustainable. That is, they must not exceed the natural recharge of the groundwater system. If recharge rates are exceeded, the use is unsustainable, and may also result in land subsidence, collapse or consolidation of the aquifers (which reduces the storage capacity of the aquifer), salinisation of the aquifer and an increased risk of pollution. Pumping water from deeper levels will also result in increased pumping costs. Surface water extraction needs to take into account other users of the water resource, and also the effect on aquatic eco-systems associated with the water body. Structures built to supply water to the farm need to minimise the disturbance of the surrounding environment (e.g. river and stream

Rationale for change:

Water extraction impacts on natural flow and recharge as well as disturbance on aquatic ecosystems and water bodies in general needs to be correctly identified and monitored. Implementation of management practices have to be required accordingly, notably through the adoption and/or implementation of a water management plan

PRINCIPLE 2 - WATER EFFICIENCY

Water Use

Question 1:

Should good management practices resulting from water management plan be explicitly worded out. If so, should it be in additional indicators or through guidance for implementation?

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

Question 2:

In your opinion, does indicators 2.2.3 requirement for Large farm on monitoring needs further description and/or guidance?

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

Question 3:

In your opinion, does indicators 2.2.3 requirement for Large farm also needs to be applied to Medium and Large farms

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

PRINCIPLE 2 - WATER EFFICIENCY

Climate mitigation

CRITERIA 2.3 (NEW)

The Producer must adopt water management practices to ensure adaptation to climate change

Intent

Water resources are part of complex ecosystems that are not yet fully understood. As climate change adds further risks and uncertainties, a water resources management style is needed that is flexible enough to adjust to ongoing change. Ensuring and monitoring water availability as well as controlling impacts of disturbed rainfall patterns over time is becoming a necessity for any land use activity. That is also part of the definition given to sustainability in agriculture.

INDICATORS

2.3.1 (NEW) Water management practices to ensure adaptation to climate change are adopted



2.3.2 (NEW) Water management practices to ensure adaptation to climate change are implemented



2.3.3 Farm management practices such as irrigation and nutrient application to better match altered phenological cycles are implemented



PRINCIPLE 2 - WATER EFFICIENCY

Climate mitigation

Guidance for implementation:

There is a considerable amount of guidance on developing water management plans encompassing adaptation and resilience to climate change in the context of agriculture.

Integrated water resources management should indeed lead Producers to assess impacts of climate change on water quantity and quality, how to perform risk assessment, including health risk assessment, how to gauge vulnerability, and how to design and implement appropriate adaptation strategies. Those aspects need to be part of the overall water management plan.

2.3.4 Technologies that conserve water and livestock species are implemented

Question 4: Do you agree with this suggestion of addressing climate change adaptation in this principle through specific water management practices?

Yes I agree ☐

No I don't agree ☐

I don't have an opinion ☐

Please explain your Answer:

GENERAL COMMENT:

Do you have any other general or specific comment to make on this principle?

Yes ☐

No ☐

If yes, please develop:



PRINCIPLE 3 - SOIL HEALTH

BETTER COTTON FARMERS CARE FOR THE HEALTH OF SOIL

Introduction to the Principle:

A healthy soil is the fundamental resource required for agricultural production. Soil contains the nutrients and water essential to crop growth. Cotton production by its nature, however, can adversely affect the very properties of a soil that make it valuable to farmers. Poor soil management can lead to large reductions in yield and off-site contamination. Soils need to be properly managed — cared for — to ensure cotton and other crops can continue to be grown.

PRINCIPLE 3 - SOIL HEALTH

Soil structure and fertility

CRITERIA 3.1

The Producer must adopt soil management practices that maintain and enhance the structure and fertility of the soil

Intent

Good soil management practices are required to maintain soil conditions that are optimal for plant growth over the long term. For example, zero or no-tillage, conservation tillage and minimum tillage systems that incorporate the use of cover crops and maintain crop residues help protect soil from erosion and promote good soil structure by protecting the organic matter, reducing the disturbance of soil micro-organisms, reducing soil compaction, increasing water infiltration and encouraging earthworm activity. The use of cover crops may also reduce nutrient leaching and help suppress weeds, while legume rotations can provide an alternative source of nitrogen as well as improving soil structure.

Cultivating the soil stimulates the breakdown of soil organic matter, incorporates crop residues under the soil surface (where it breaks down faster), disrupts soil structure and increases the risk of compaction.

INDICATORS

- 3.1.1 Estimated number of farms adopting recommended soil management practices to maintain and enhance the structure and fertility of the soil in line with continuous improvement plan
- 3.1.2 Estimated number of farms adopting recommended soil management practices to maintain and enhance the structure and fertility of the soil in line with continuous improvement plan
- 3.1.3 Farm maps with soil types identified are available
- 3.1.4 Soil testing is conducted to monitor soil condition and potential problems



PRINCIPLE 3 - SOIL HEALTH

Soil structure and fertility

Guidance for implementation:

Techniques that minimise soil erosion are well-known and should be adopted, wherever appropriate. This may include practices such as ground cover management, biomass recycling, tillage and soil compaction monitoring, soil performance monitoring, diversity increase...etc.

Smallholders should be able to demonstrate that they have an understanding of the techniques required to manage their soils and that they are being implemented.

National interpretation should refer to national guidance material, and identify the best management practices and appropriate techniques for maintaining soil quality in local conditions, including guidance on soil types, and any appropriate performance thresholds.

Question 1:

Would you agree that soil type identification and soil testing required from Large Farms are also applied to Smallholders and Medium Farms too?

Strongly disagree ☐

Disagree ☒

Neither agree or disagree ☐

Agree ☐

Strongly disagree ☐

Please explain your Answer:

PRINCIPLE 3 - SOIL HEALTH

Soil structure and fertility

Question 2:

Do you agree with turning criteria 3.1 into a minimum requirement?

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

PRINCIPLE 3 - SOIL HEALTH

Soil structure and fertility

CRITERIA 3.2

The Producer shall apply Nutrients on the basis of crop and soil needs. Timing, placement and quantity applied are all optimised.

Intent:

Cotton requires a number of nutrients for good crop growth, and deficiencies can reduce crop yields. Deficiencies in nitrogen (N), phosphorous (P), or potassium (K) in particular can significantly reduce yield, and a shortage of N may result in short and / or weak fibres. Each of these nutrients can be supplied in various forms (e.g. commercial fertilisers, compost, animal manure), and both the form they are supplied in and the stage of the crop they are applied at, will dictate the best options for optimal application.

INDICATORS

3.2.1 Estimated number of farms with nutrient application based on soil test results



3.2.2 Estimated number of farms with nutrient application based on soil test results



PRINCIPLE 3 - SOIL HEALTH

Soil structure and fertility

- 3.2.3 An annual nutrition budget that takes into account all nutrient sources (including legume crops) and crops exports of nutrients is developed.
- 3.2.4 Soil tests and leaf tests to assess nutrient levels and fertiliser needs during the season are used.
- 3.2.5 Fertilisers are applied using precision agriculture technologies
- 3.2.6 Long-term nutrition trends are monitored



Guidance for implementation:

The timing, placement and quantity of any fertilisers and soil conditioners applied are important factors that affect the uptake of nutrients by the crop, and the minimisation of nutrient losses to the environment. Timing and quantity need to ensure that the nutrients being supplied match the demands of the crop, while placement will influence the availability of the nutrients to the crop, and how efficiently they can be used. The optimal timing, placement and quantity applied will depend on the stage of crop growth, the nutrient being applied and form it is being applied in. The application of nutrients should match the needs of the crop to ensure that:

- 1) Money is not wasted on purchasing and applying nutrients that are superfluous to the needs of the crop; and*
- 2) That the risk of excess nutrients leaving the farm and causing off-farm pollution (especially eutrophication) is minimised.*

Furthermore, excess nitrogen may cause rank (excessive) growth of the cotton crop, leading to a longer growing season and greater exposure to pests, and weak, immature fibres. Rank growth also makes the crop more difficult to defoliate, and increases the potential for a high trash content in the lint cotton.

Soil nitrogen in particular is vulnerable to being lost to the crop either through leaching or denitrification, while phosphorus quickly becomes fixed in soil, and less available to the cotton crop; proper placement of P is crucial for optimal uptake by the crop. The potential for nitrogen and phosphorous to cause eutrophication, or to contaminate ground or surface water depends to a large extent on the local site and soil conditions. Locally-adapted better management practices need to be implemented to ensure that nutrients are applied effectively, and to mitigate and control the loss of these nutrients from the farm. As nitrous oxide is a greenhouse gas, efficient use of nitrogen will also help reduce the greenhouse gas emissions associated with cotton production.

PRINCIPLE 3 - SOIL HEALTH

Erosion Mitigation

CRITERIA 3.3

The Producer shall adopt management practices that minimise erosion, so that soil movement is minimised and water courses, drinking water sources and other bodies of water are protected from farm run-off

Intent:

Erosion results in the loss of top soil (the portion of the soil that which contains the greatest level of organic matter and nutrients) reduced potential rooting depth and lower soil water holding capacity, all of which reduce soil fertility and productivity. Soil erosion can also have significant off-site affects, such as reduced water quality (through sedimentation and movement of farm chemicals that may be attached to that soil) and the eutrophication of water bodies through the transport of nitrogen and phosphorus. While erosion control is a critical concern for both irrigated and rain-fed farming systems, each system may have different techniques and strategies able to be implemented.

There are various types of erosion, but the most critical – from a farming perspective – is generally that caused by water movement. Controlling how water moves on the farm can reduce erosion and help protect water sources and water bodies from contamination.

Water that has run off from fields treated with pesticides may contain nutrients and traces of those pesticides, either dissolved in the water, or attached to the soil particles being carried by the water. Reducing water flows and erosion (the amount of soil carried by the water) protects soil fertility and helps to minimise the risk of off-site contamination.

One of the prime contributing causes of soil erosion is over-cultivation of the soil, which reduces soil organic matter levels and can also lead to a decreased ability for water to infiltrate the soil, leading to greater surface run-off. The amount of erosion is also linked to the speed with which the water is moving, making it important to manage and reduce the speed that water flows across the farm. Management practices that control water flows – such as strip cropping, maintenance of crop residues and groundcover, growing cover crops and use of earthworks such as contour banks and diversion banks — are therefore important considerations.

PRINCIPLE 3 - SOIL HEALTH

Erosion Mitigation

INDICATORS

3.3.1 Recommended soil management practices to minimise erosion are adopted by



3.3.2 Recommended soil management practices to minimise erosion are adopted by



3.3.3 Eroded areas, and areas at risk of erosion if any are identified

3.3.4 Actions to remedy and mitigate erosion are identified

3.3.5 All actions to remedy and mitigate erosion are implemented

3.3.6 Eroded areas and areas at risk of erosion are regularly monitored (at least annually and after every significant storm events).



PRINCIPLE 3 - SOIL HEALTH

Climate mitigation

Guidance for implementation:

Water movement and erosion can be controlled by ensuring a good ground cover is present whenever possible (especially as cotton stubble does not provide particularly good ground cover over the off-season), and through minimising the number of times the soil is disturbed through tillage. Depending on the availability of suitable climatic conditions and crop options to grow, using crop rotations, strip cropping, inter-cropping and cover crops can provide additional benefits to erosion control: e.g. reducing reliance on added fertiliser; more efficient nutrient uptake; increased biological stability; reduced run-off; and reduced off-site contamination of surface waters.

The specific practices that may need to be implemented on the ground will depend on the prevailing circumstances of the field or farm in question: e.g. is the site at risk of erosion if appropriate management practices and/or structures are not implemented?

It is also important that extant erosion problems, such as gullies, be managed and repaired. Significant erosion problems may require immediate and drastic remedial work, as well as the long-term adoption of management practices designed to minimise erosion so that the problem can be stabilised and prevented from getting worse.

PRINCIPLE 3 - SOIL HEALTH

Climate mitigation

CRITERIA 3.4

The Producer must adopt management practices to minimize soil carbon emission and increase carbon sequestration

Intent:

The principal areas of GHG emission in cotton production are crop management practices, field energy use and transport of fertilisers. Sources of emissions include direct emissions from N-based fertiliser application, decomposition of organic matter, combustion of fuel in watering and field preparation; and indirect emissions from production of fertilisers and pesticides, and transport of nutrients. Carbon sequestration from applying organic matter and managing crop residues are also considered in the GHG emission estimation.

INDICATORS

3.4.1 Management practices to minimize soil GHG emission and increase carbon sequestration are adopted



3.4.2 Management practices to minimize soil carbon emission are implemented



3.4.3 Proxy measures are undertaken to measure carbon emission resulting from management practices



3.4.4 Crop residue management practices are implemented.

PRINCIPLE 3 - SOIL HEALTH

Climate mitigation

Guidance for implementation:

Generally, there are three areas of farm management that can affect soil carbon sequestration: tillage, cropping intensity and fertilization.

Tillage and soil carbon are negatively related. The greater the tillage, the less soil carbon. Different no-till systems result in varying soil disturbance, but any system that reduces tillage substantially can increase soil carbon.

Cropping intensity and soil carbon are positively related. The more frequent the cropping and greater the biomass inputs, the more soil carbon.

Fallow reduces cropping intensity. Reducing fallow typically increases soil carbon through greater annualized biomass inputs, but may be economically difficult.

Fertilization affects soil carbon mainly through crop biomass. However the carbon:nitrogen ratio of soil organic matter results in stable organic matter. If insufficient nitrogen is present to permit stable formation of soil organic matter via soil microbial degradation of crop residues, then little carbon may be sequestered.

Rationale for change:

Agricultural activities serve as both sources and sinks for greenhouse gases, so specific agricultural practices definitely slow the pace of global warming. Carbon dioxide dynamics are related to energy use cycles on farms and more importantly, to soil management. A significant effort is therefore needed from sustainable agriculture initiatives such as BCI.

PRINCIPLE 3 - SOIL HEALTH

Climate mitigation

Question 3:

Do you approve the decision to create a new indicator dedicated to good soil management practices ensuring climate change mitigation?

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

GENERAL COMMENT:

Do you have any other general or specific comment to make on this principle?

Yes ☐

No ☐

Please explain your Answer:

PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT

BETTER COTTON FARMERS ENHANCE BIODIVERSITY

Introduction to the Principle:

Habitat extent and quality has a direct and significant impact on biodiversity. Land used for the production of crops has typically been cleared of vegetation and natural habitats, and this clearing of habitat has a direct and significant negative impact on biodiversity. **Biodiversity can be of utilitarian, aesthetic, recreational, intrinsic or ethical value to people, and is also linked to ecosystem resilience.** The need to conserve natural habitats, and therefore biodiversity, is important for a number of reasons. A reduction in habitat reduces or eliminates the breeding, foraging or migratory routes of many species. The cultivation of single crops over a large area reduces the total number of species able to live within that area, and promotes the establishment of dominant populations that may become a pest. A more diverse habitat will provide for a more diverse range of species able to live there, and therefore allow for more potential competitors for potential pests.

To lessen their impact on biodiversity, cotton farmers can conserve or restore areas of natural habitat on their land, and adopt practices that minimise the negative impact on the habitat that surrounds their farm. **Implementation of Integrated Pest Management techniques for example will indirectly increase insects, mammals and vegetal populations and overall biodiversity will then be enhanced compared to under conventional production.**

PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT *Land Use Change*

CRITERIA 4.1

Practices are adopted that enhance biodiversity on and surrounding the farm

Intent

Enhancing farm biodiversity is important for a number of reasons, including:

- It can provide a refuge for beneficial insects;
- It may act as a trap crop for crop pests;
- Crop rotation is also an important means for improving and maintaining soil health, for example through breaking disease cycles, fixing nitrogen and biological ripping of the soil.

The protection of riparian land — the land surrounding water bodies — is particularly important, as it is often the most fertile and productive part of the landscape. As riparian land is associated with water, it generally supports a greater diversity of plant and animal life than non-riparian land, and provides a refuge for animals during times of stress, such as drought or fire or hunting. It is important that riparian land is protected from farm run-off and that it is not cleared of vegetation. Removal of riparian vegetation can lead to the destabilisation of stream and river banks, and increased erosion. Practices implemented to address Criterion 3.3 to minimise erosion will also help protect riparian zones, but given its special importance in the landscape, riparian land may require special attention to ensure it is protected from farm run-off. For example, it may be possible to direct water that leaves the farm away from riparian land, or to have well-vegetated buffer strips placed between riparian land and the crop.

PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT *Land Use Change*

INDICATORS

- 4.1.1 Good Management practices (validated locally) to enhance biodiversity on and surrounding the farm are shared with farmers through appropriate dissemination material in local language



Guidance for implementation:

Management practices adopted to help achieve other Criteria, such as IPM, pesticide choice (using the least disruptive option), soil fertility, and erosion control, will all contribute to enhancing biodiversity both on and off the farm. Opportunities to provide or enhance off-farm biodiversity through local/national producer collaboration may be possible, and should be explored.

Good management practices are available through learning tools put in place by BCI with notably National Guidance Material and Online Library.

Question 1:

Should Principle 4 be:

Option 1: “Better Cotton is produced by farmers who conserve natural habitats” or

Option 2: “Better Cotton is produced by farmers who enhance biodiversity”?

Option 1 ☐

Option 2: ☐

I don’t have an opinion ☐

Please explain your Answer:

PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT *Land Use Change*

CRITERIA 4.2

For the use and conversion of land primarily used to grow cotton, the Producer must follow a rigorous, independent evaluation and consultation process

Intent:

Substantial contribution that cotton production can make to livelihoods and food security in developing countries is widely recognized. This new criterion is intended to provide a framework to ensure that the rights of local communities and indigenous peoples are respected, and that environmental concerns are understood prior to conversion of land from its natural state to farmland for cotton, so that No Net Loss of High Conservation Values is realized.

INDICATORS

4.2.1 The use and conversion of land to grow cotton conforms with national legislation related to agricultural land use.



4.2.2 A Social and Environmental Impact Assessment (SEIA) is conducted on any land planned for conversion from its natural state after January 1, 2016. The Assessment should be undertaken by an independent expert and published for public review and comment prior to commencement of any new Land Use Change from its natural state.



4.2.3 Where the SEIA identifies the presence of areas of High Conservation Value, a management plan is established to preserve those Values, for all such conversion after January 1, 2016



PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT *Land Use Change*

Guidance for implementation:

A Social and Environmental Impact Assessment is the core process which ensures these key issues are given appropriate consideration is the commissioning of an expert Social and Environmental Impact Assessment (SEIA) (including a HCV assessment). The assessment(s) should be conducted by an independent body widely recognized for its subject matter expertise. It is recommended to utilize assessors licensed by an accreditation scheme such as that provided by the High Conservation Value Resource Network. The assessment should, of course, ensure compliance of the conversion project with applicable local legislation, but also internationally recognized standards where such practice exceeds the requirements of local law.

Besides, BCI recognises that there are areas that have such intrinsic or extrinsic value attached to social, environmental or wildlife conservation purposes that these values must not be lost in the process of accommodating the production of cotton. A useful reference source is the High Conservation Value Resource Network which categorises HCV as follows:

- HCV1: Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.
E.g. the presence of several globally threatened bird species.*
- HCV2: Large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.
E.g. a large tract of Mesoamerican flooded grasslands and gallery forests with healthy populations of Hyacinth Macaw, Jaguar, Maned Wolf, and Giant Otter, as well as smaller species.*
- HCV3: Rare, threatened, or endangered ecosystems, habitats or refugia.
E.g. patches of a regionally rare type of freshwater swamp.*
- HCV4: Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.
E.g. forest on steep slopes with avalanche risk above a town.*
- HCV5: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples.
E.g. key hunting areas for communities living at subsistence level.*
- HCV6: Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples. E.g. sacred burial grounds within a forest management area or new agricultural plantation.*

PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT *Land Use Change*

Guidance for implementation (continued):

While all conversion of natural landscapes will involve some impact on biodiversity and ecosystems, it is essential that projects seeking the BCI license be able to demonstrate No Net Loss of High Conservation Value(s). No Net Loss in the BCI context is defined as the point at which project-related impacts on biodiversity are balanced by measures taken to avoid and minimize the project's impacts. Note that it is the High Conservation Value that must be protected, not necessarily a defined parcel of land.

For planned conversion of areas greater than 200 Ha, a complete SEIA shall be conducted. For areas under 200 Ha a complete SEIA is required only if the conversion is taking place in a region of significant social or environmental sensitivity. In areas of conversion under 200 Ha without particular environmental or social sensitivities, the terms of reference for the SEIA may limit the scope of the assessment to national requirements.

- 4.2.4** Where set-asides for existing rights of local communities and or areas of High Conservation Value are established, there are evidence of an agreement reached in compliance with the principles of free, prior and informed consent (FPIC)



PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT *Land Use Change*

Guidance for implementation:

FPIC concept is widely recognized and used by voluntary standards to ensure that no licence holder get engaged in project development causing violation of local communities or indigenous people.

In the event of delegation of control over Project development or set aside areas establishment, a binding agreement between The Producer and the local communities shall be concluded through Free, Prior and Informed Consent. The agreement shall define its duration, provisions for renegotiation, renewal, termination, economic conditions and other terms and conditions. The agreement shall make provision for monitoring by Local communities of The Producer compliance with its terms and conditions.

'Binding agreements' may be but are not limited to written agreements. They may also be based on oral and honour systems, to be applied in cases where written agreements are not favoured by indigenous peoples, either for practical reasons or on principle. The Producer must maintain appropriate records of these agreements which may include written accounts, audio or film records, etc.

Any agreements reached should be considered part of a continuous process, based on dialogue and negotiation.

The process of Free, Prior and Informed Consent applies not only in the case of legally recognized rights, but may also include cases where rights of indigenous peoples are unclear or under negotiation.

Question 2: Are you in favour of a cut-off date set on 1 January 2016?

Yes ☐

No ☐

I don't have an opinion ☐

Please explain your Answer:

PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT *Land Use Change*

- 4.2.5** Lists of stakeholders are compiled, a record of communications established, as well as a record of actions taken in response to input received from potentially affected parties.



Guidance for implementation:

A proof of broad and inclusive consultation is available according to a pre-defined protocol. Evidence of stakeholder outreach needs to be kept and made available under request.

- 4.2.6** Where compensation (monetary or otherwise) is proposed to local communities or indigenous people for the loss of legal, customary or user rights, a process shall be established to enable such people, local communities, and other potentially affected parties to select their own representation in such negotiations.



Guidance for implementation:

It is paramount to identify right holders and their representative institutions as well as their respective claims and rights. Once this is done, Local Communities and Indigenous People should select their own representatives. For further guidance, refer to ILO 169 and UNDRIP conventions.

Rationale for change:

In the current version of the Production principle and Criteria, Land Use requirement is to abide by applicable national and other applicable laws. However it has been flagged by stakeholders that National legislation governing land use as a way to directly and indirectly protect natural habitats and biodiversity is not enough in countries with poor governance.

The proposed version is an alternative to go beyond national legislation.

PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT *Land Use Change*

Question 3:

Do you agree to leave the choice to select the Social and Environmental Impact Assessment methodology for the independent evaluation?

Strongly disagree ☐

Disagree ☐

Neither agree or disagree ☐

Agree ☐

Strongly agree ☐

Please explain your Answer:

Question 4:

Should BCI apply new criterion 4.2 only to Medium Farms and Large Farms and exonerate Smallholders who will stick to current version on national legislation?

Yes ☐

No ☐

I don't have an opinion ☒

Please explain your Answer:

PRINCIPLE 4 - BIODIVERSITY ENHANCEMENT *Land Use Change*

Question 5:

Would you recommend to undertake a HCV assessment in lieu or in complement to the Social and Environmental Impact Assessment?

Strongly disagree ☐

Disagree ☐

Neither agree or disagree ☐

Agree ☐

Strongly agree ☐

Please explain your Answer:

GENERAL COMMENT:

Do you have any other general or specific comment to make on this principle?

Yes ☐

No ☐

If yes, please develop:

PRINCIPLE 5 – FIBRE QUALITY

BETTER COTTON FARMERS CARE FOR AND PRESERVE THE QUALITY OF FIBRE

Introduction to the Principle:

As cotton is grown first and foremost for its fibre, the quality of the fibre grown by the farmer is fundamental to its marketability and value. The efficiency of the gin will be affected by the level of trash and contamination of the seed cotton, and the quality and therefore value of yarn that can be spun is directly related to the quality of the lint cotton delivered to the spinning mill (the cost of the cotton can represent up to 65 % of the total operating costs for a spinning mill). Continuing advances in spinning technology are placing greater and greater pressure on cotton farmers to supply cotton that is generally longer, stronger, finer, more uniform and free from contaminants. These characteristics of the cotton are of particular importance to the spinning mills, to maximise the speed and efficiency at which they operate.

Three broad characteristics of the cotton are important: the inherent fibre characteristics, the level of trash (i.e. waste), and the level of contamination. The seed cotton delivered to gins should be as low in trash as possible, free of contaminants, and not too wet or dry. The value of cotton lint is related to both the quality of yarn that can be produced from it, and the efficiency with which this yarn can be produced. It is therefore essential that farmers consider the needs and requirements of these users of the cotton that they grow. It is also generally the case that the higher the quality of the cotton, the higher its value, which should lead to a better price for the farmer.

The glossary details the major fibre attributes either measured by or of importance to the spinning mill and includes a brief indication as to why the attribute is important.

PRINCIPLE 5 – FIBRE QUALITY

Fibre features

CRITERIA 5.1

The Producer must adopt management practices that maximise the fibre quality.

Intent

Cotton cultivars vary in their fibre quality attributes, and the choice of cultivar is a significant factor in determining fibre quality. Also, the characteristics of the lint actually grown by a farmer will vary according to seasonal conditions.

BCI recognises that the ability of a farmer to influence the characteristics of the fibre they produce will vary according to the characteristic in question (some are more sensitive to farm management than others), and the geographic and seasonal conditions, such as rainfall, daytime and night time temperatures, soil type and pest pressure. Nevertheless, there is a range of management practices that are within the control of the farmer, which if implemented, will help ensure (in the absence of unseasonal weather conditions) that the full potential of the fibre attributes of the cultivar can be reached.

Crop management practices that can significantly affect fibre quality include:

- Choice of cultivar: is it appropriate for the local climatic conditions and the planting date?
- Planting date: does it take into account likely seasonal conditions and pest pressures?
- Planting rate and row spacing: are they appropriate for the variety, soil type and seasonal conditions?
- Nutrition management: poor nutrition can result in lower quality lint, while excess nitrogen can lead to excess growth, delayed harvest and excess levels of trash
- Irrigation management: for irrigated farms, it is important to ensure that the crop is not water-stressed during the critical stages of fibre development
- Disease management: diseases can stunt crop growth and lead to reduced cotton fibre quality

PRINCIPLE 5 – FIBRE QUALITY

Fibre features

- Insect management: damage to bolls needs to be controlled, and late-season aphids and whiteflies need to be controlled to avoid 'sticky' cotton
- Weed management: weeds in the cotton crop may lead to contamination of the seed cotton and lint.

Generally, good management of these issues for their own sake will result in good fibre quality; thus proper irrigation scheduling to avoid stress and maximise yield will also maximise the quality of the fibre, and good insect management, as well as ensuring a crop yield, will avoid the risk of fibre damage or sticky cotton.

INDICATORS

5.1.1 Estimated number of best practices (validated locally) to maximise fibre quality shared with farmers through appropriate dissemination material in local language



5.1.2 Estimated number of farms adopting recommended practices to maximise fibre quality in line with continuous improvement plan



PRINCIPLE 5 – FIBRE QUALITY

Fibre features

- 5.1.3 A plan for managing fibre quality that includes the following elements: varietal selection, planting date, planting rate, row spacing, crop growth and weed management is developed.
- 5.1.4 Overall results for the quality of the crop at the end of the last season is reviewed.
- 5.1.5 When problems with fibre quality are identified, attempt to understand the reasons for the problems (eg. discuss these with other relevant people such as consultants, agronomists, researchers, merchants) is undertaken and actions to remedy the problems are implemented.



Guidance for implementation:

This diverse range of quality characteristics includes both aspects that are directly influenced by genetic and seasonal considerations and conditions – and which can nevertheless also be influenced by farm management decisions —and aspects under the direct control of the farmer, such as the level of contamination. The focus on quality therefore includes the need to manage intrinsic fibre characteristics to the extent possible (Criterion 5.1), as well as man-made contamination and trash content (Criterion 5.2).

BCI is not establishing a base quality grade that has to be achieved to meet this Production Principle. Rather the focus is on promoting the adoption of practices that are aimed at producing the best quality cotton possible under the prevailing circumstances – taking into account the market that the cotton is being produced for.

BCI is focused on the farm and therefore on those aspects of cotton production that are under the control of the farmer. When it comes to transporting cotton from the farm, and managing the contamination risks associated with transport – given the importance of this stage of the cotton production system for maintaining this aspect of quality — BCI recognises that responsibility and therefore the ability to manage contamination risks will vary. However, as it is possible that the farmer may be directly responsible for transporting cotton from the farm to the gin, this situation is included within the scope of this Principle, under Criterion 5.2.

PRINCIPLE 5 – FIBRE QUALITY

Seed management

CRITERIA 5.2

The Producer must harvest, manage and store seed cotton to minimise trash, contamination and damage.

Intent:

Trash refers to the degree of cotton leaf remaining in the lint cotton after it has been ginned. Contamination refers to anything found in the lint cotton that is not cotton fibre, or cotton leaf. It includes weeds, bark from the cotton plant, and any man-made substances. Damage refers to degradation of the fibre, and can result from fire, or microbial activity. For example, if cotton is stored when it is too moist, or in conditions that are too moist, damage from microbes is likely.

INDICATORS

5.2.1 Seed cotton good management practices in term of harvest and storage are adopted



PRINCIPLE 5 – FIBRE QUALITY

Seed management

Guidance for implementation:

While many of the characteristics of the fibre, such as length and strength, will already have been determined by the time the crop is ready to harvest, good management of the harvest – including of defoliation (where this practice is used), and of storage and transport of the seed cotton is essential to maintain the quality of the fibre, and to ensure that the cotton is not contaminated or damaged. Harvest timing and management will affect the level of trash, and as soon as people start handling the cotton, a contamination risk arises.

Contaminants can be very difficult to remove from cotton, and contamination can result in a significant downgrading – or outright rejection – of a lot of yarn, fabric or garments. Contamination is most likely to occur as a result of poor management practices during harvest, storage and transport, and ginning and baling (pressing). Care needs to be taken therefore to ensure that practices are adopted that reduce the risk of contamination. For example, choosing appropriate materials and methods for wrapping and storing cotton, and observing hygiene ‘rules’ during storage and handling.

Issues to consider therefore are: harvest management and general hygiene, choice of materials in which to pick and carry/move cotton, how and where cotton is stored, and how cotton is transported.

As noted above, cotton may be at risk of microbial damage if it is stored at too high a moisture content. Further, high moisture can increase the risk of fire. The choice of location for storing cotton is therefore important to minimise these risks.

PRINCIPLE 5 – FIBRE QUALITY

Seed management

GENERAL COMMENT:

Do you have any other general or specific comment to make on this principle?

Yes ☐

No ☐

If yes, please develop:

PRINCIPLE 6 – DECENT WORK

PRINCIPLE 6 – BETTER COTTON IS PRODUCED BY FARMERS WHO PROMOTE DECENT WORK

Introduction to the Principle:

Decent Work is understood by the BCI as the concept originated by the International Labour Organisation (ILO) to describe work that provides opportunities for women and men to work productively in conditions of freedom, equity, security and human dignity. For the ILO, Decent Work encompasses four 'pillars': fundamental principles and rights at work and international labour standards; employment and income opportunities; social protection and social security; and social dialogue.

~~Decent Work has been endorsed by a wide range of international actors including the UN family, the G8 and the European Commission. The Millennium Development Goals were amended in 2008 so that MDG1 – to eradicate extreme poverty and hunger – includes a new target 'To achieve full and productive employment and decent work for all, including women and young people'.~~

As a means of describing how work contributes to equitable, inclusive and sustainable development, the concept of Decent Work enables BCI to develop a broad-based and consistent approach to the diversity of contexts in which cotton is grown, from family smallholdings to large-scale farms.

Evidently, not all four 'pillars' of the Decent Work Agenda are 'normative' – that is, giving rise to standards. The part of the Decent Work Agenda most relevant to the ~~standards encapsulated in the BCI Production Principles and Criteria~~ is the respect of labour rights, expressed in international labour standards and in national labour legislation.

International labour standards

BCI considers the ILO, the UN specialised agency on work and employment, to be the international authority on labour matters. The ILO has developed a system of international labour standards. These standards primarily take the form of Conventions. In 1998, the ILO issued its Declaration on Fundamental Principles and Rights at Work which identified eight of

PRINCIPLE 6 – DECENT WORK

these Conventions as ‘fundamental’. These Conventions cover the four so-called ‘core labour standards’: freedom of association and the right to collective bargaining; the elimination of forced labour; the abolition of child labour and the elimination of discrimination in respect of employment and occupation. The 1998 Declaration commits all 183 ILO Member States to respect and promote principles and rights in these four areas, whether or not they have ratified the relevant Conventions.

In determining the content of its Decent Work Production Principle, BCI has referred to both other private voluntary standards bearing on primary agriculture and, primarily, the Conventions of the ILO which form the basis for these voluntary standards. While the BCI Decent Work Criteria are worded in their own terms, references are given to the key international standards (ILO Conventions) that BCI follows.

National labour and occupation health and safety legislation

The fundamental premise that growing Better Cotton respects national law underpins all the BCI Production Principles and Criteria. This is particularly relevant to the Decent Work Principle. Many, and in some cases all, of the areas covered in the Principle are regulated by national law in cotton-producing countries. BCI therefore requires that all cotton producers abide by national labour and occupation health and safety legislation, unless that legislation sets standards which are below the referenced internationally recognised standards and conventions, in which case the international standards prevail. (This may, for instance, be the case in countries where agriculture is excluded from the scope of labour and occupation health and safety legislation.) However, where national legislation sets higher requirements on a specific issue than these standards, then national legislation shall apply.

Intent of the Principle:

The sustainability of global cotton production entails not only environmental but also social considerations. For BCI, Better Cotton is ‘Better’ only to the extent that it entails improvements for farming communities and farm workers, as well as the environment.

BCI understands that downward economic pressures bearing on cotton producers, particularly in developing countries, are an effective bar on improving both the environmental and social performance of cotton farming. In seeking to support the development of skills and institutions – particularly producer organisation – alongside facilitating access to information, BCI’s commitment is to seek to change the circumstances which perpetuate and entrench

PRINCIPLE 6 – DECENT WORK

unsustainable labour practices in many cotton-growing regions, and to enable investment in improvements for community, environment and workforce.

The meaningful application of 'labour standards' to global cotton cultivation is by no means straightforward. Within the sector, there are fluid boundaries between self-employment, family/community labour and waged labour. It is also important to note that agricultural waged workers do not form a homogeneous group of people: they may be full-time, seasonal, temporary, migrants, child labourers, indigenous workers, piece-rate workers or a combination of these. Moreover, the distinction between farmer and worker may be blurred, as many small farmers also work regularly for other farmers to supplement their income.

The numerical majority of cotton farmers worldwide are small-scale producers whose capacity to modify employment practices is closely related to farm economics. This is why BCI has adopted the broad perspective of Decent Work, in order to **position** the promotion of labour rights within the broader context of BCI's commitment to farm-level capacity building on the basis of need. It also serves to explain why BCI has developed, in close consultation with stakeholders worldwide, a differential series of Decent Work Criteria, reflecting the different working realities of varying scales of cotton cultivation.

PRINCIPLE 6 – DECENT WORK

Child Labour

CRITERIA 6.1

The Producer must ensure ~~there is no child labour in accordance with ILO convention 138.~~

Exceptionally, ~~In the case of family smallholdings, children may help on their family's farm provided that the work is not liable to damage their health, safety, well-being, education or development, and that they are supervised by adults and given appropriate training.~~

Rationale for change:

The previous use of 'Exceptionally' was misleading, as this provision is not an exception to ILO 138. It is more of an interpretation of the ILO allowance for light work, specifically in the context of smallholder agriculture.

Intent

Child labour is work that is mentally, physically, socially or morally dangerous and harmful to children. It interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or to combine school attendance with excessively long and heavy work.

The issue of child labour is usually at the forefront of discussions when dealing with labour concerns in the cotton sector and is reported in many cotton-producing countries, mostly though not exclusively those characterised by high levels of smallholder production. Children contribute labour to cotton growing in these countries, primarily in cotton picking and to a lesser degree in weeding activities.

BCI considers that child labour is both a symptom and cause of poverty. Given the importance, and complexity, of the issue, BCI has given considerable thought to its approach, and consulted a broad range of parties, including the Regional Working Groups. This process brings to light the following key issues.

Contracted child labour is employed in some cotton-producing regions, including those regions where children's contributions are commonly described as 'family-based' work. There is agreement that national and international standards should apply to the employment of children, governed by C138, or where national legislation sets a higher minimum age, by the law of the country in question. This minimum age of employment is at least 15 years of age,

PRINCIPLE 6 – DECENT WORK

Child Labour

except in those developing countries which have temporarily set a lower threshold at 14 years, in accordance with ILO C138.

BCI's approach to child labour in family smallholdings seeks to foreground the basic issues at stake – the child's right to education, children's health and developmental well-being according to age and activity – while recognising the context of family smallholder agriculture in many developing country settings. For this reason, an allowance is made for smallholders to help on their family's farm under certain defined, cumulative conditions. ~~following exception for smallholders: children aged under the national minimum age for access to employment may help on their family's farm in certain defined conditions, and these conditions are cumulative (that is, all of them must apply at the same time):~~

- » ~~children may only work on family smallholdings if their work is structured so as to enable them to attend school~~
- » ~~this work should not be so demanding as to undermine their education~~
- » ~~they should not perform tasks that are hazardous for them because of their age – that is, the hazardous work Criterion 6.2 described above also applies to family smallholding~~
- » ~~they must be guided – both in terms of learning skills and supervision of tasks – by a family member. A family smallholding is understood as a small-scale cotton farm which is not structurally dependent on external hired labour.~~

This ~~exemption~~ follows the logic of both the ILO Convention 138 and with other social sustainability standards in smallholder agriculture, including the recommendations of the ISEAL Alliance SASA harmonisation project. (The provisions of ILO C138 exclude 'family and small-scale holdings producing for local consumption and not regularly employing hired workers' (Art.5).)

INDICATORS

- .1. There are no workers below the age of 15 (14 in certain specified countries), or below the minimum age for employment defined by local law (whichever is higher).



PRINCIPLE 6 – DECENT WORK

Child Labour

Rationale for change:

Previously, there were no indicators distinct from the generic criterion for MFs and LF, and for smallholders, the minimum indicator was to have a time-bound plan on the progressive eradication of child labour. 6.1 needs to be fully observed by smallholders to prevent systemic cases of child labour within a PU. BCI acknowledges the unfeasibility of guaranteeing immediate and total eradication of child labour in the context of smallholder Producer Units. BCI's Assurance Program allows for PU compliance even where isolated, non-systemic breaches of criteria have occurred, through its concept of "incidental noncompliance". Therefore, implementation of this indicator is relevant for smallholders too.. Because of the elevated risk of child labour in the smallholder context, and potentially high frequency of incidental noncompliance, the indicator on the time-bound plan should be retained for smallholders as an additional safeguard (see 6.1.2).

- .1. The PU has a time-bound plan for the prevention and progressive eradication of child labour in accordance with ILO convention 138



- .1. — ~~Exceptionally in the case of family smallholdings, children aged under the national minimum age for access to employment~~ Children who are under 15 (14 in certain specified countries), or under the legal minimum age for access to employment (whichever is higher), may **only** work on their family's farm under ~~certain defined~~ , these cumulative conditions are:



- (i) children may only work on family smallholdings if their work is structured so as to enable them to attend school;
- (ii) this work should not be so demanding as to undermine their education;
- (iii) they should not perform tasks that are hazardous for them because of their age;
- (iv) they must be guided – both in terms of learning skills and supervision of tasks – by a family member;
- (v) they have attended appropriate training.

- 6.1.4 A written code of conduct/child labour policy, making explicit under which circumstances children can or cannot work and why, has been communicated to farmers/worker



PRINCIPLE 6 – DECENT WORK

Child Labour

Rationale for change:

This indicator is proposed to get promoted from an improvement to a minimum requirement, as this is considered an essential component of the mandatory child labour elimination plan, and essential basis for farmer awareness raising and training activities on Child Labour..

6.1.5 Procedures are in place for checking the age of workers including record keeping at farm level

6.1.5 Child protection/monitoring committees are established

6.1.6 The complete elimination of child labour in accordance with ILO convention 138

~~Estimated number of child labourers appropriately transferred to education~~

~~Estimated number of family of child labourers provided with alternative sources of income (through local partnerships initiatives)~~



Rationale for change:

These indicators are proposed to be removed as they only apply in certain circumstances (where incidence of child labour has been identified). As a general rule, compliance indicators should be applicable to all. Issues of child labour remediation activities (such as transfer to education and alternative source of income) are better addressed through corrective action plans and training activities under the capacity building component of the Better Cotton Standard System.

PRINCIPLE 6 – DECENT WORK

Child Labour

Guidance for implementation:

Not all work done by children is classified by the ILO as child labour that should be eliminated. Work that does not affect children's health and personal development or schooling can be a good thing, such as helping around the home or in a family business or earning pocket money outside school time. Whether a job is classified as 'child labour' depends on the child's age and the type and hours of work performed.

ILO Conventions and national legislation

In reality, there is no clear line separating 'good' children's work from 'bad' child labour. It is more practical to refer to two approaches to defining child labour, as does the ILO in its Conventions on child labour (C138 on minimum age and C182 on Worst Forms of Child Labour). These approaches focus on age and activity respectively.

- *Age: according to the first approach, children under a certain age should not work. ILO Convention 138 sets this at 15 (14 in developing countries), or statutory school-leaving age, whichever is higher. The two main exceptions are: a lower minimum age of 13 (12) for 'light work' – which neither harms a young person's development nor prejudices school attendance – and a higher minimum age of 18 for hazardous work, defined below.*
- *Activity: according to the second approach, child labour is defined according to its negative effects on children. While 'light work' may be undertaken by younger workers from age 13, 'hazardous work' should not be performed by anyone aged under 18. 'Hazardous work' is work which jeopardises children's physical or psychological well-being, due to the nature or conditions of the work. This aspect is key in understanding the concept of child labour in cotton, because several activities relating to cotton cultivation may be deemed hazardous, including pesticide application and harvesting. Convention 182 calls upon ILO member countries to determine through national legislation the list of activities which would give rise to Hazardous Child Labour if performed by a worker aged under 18.*

PRINCIPLE 6 – DECENT WORK

Child Labour

Guidance for implementation (continued):

The combination of age and activity in defining what constitutes child labour is summarised below:

<i>Source: International Labour Organisation</i>	<i>The minimum age at which children can start work</i>	<i>Possible exceptions for developing countries</i>
Hazardous work Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18.	18 (16 under strict conditions)	18 (16 under strict conditions)
Basic Minimum Age The minimum age for work should not be below the age for finishing compulsory schooling, which is generally 15.	15	14
Light work Children between the ages of 13 and 15 years old may do light work, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training.	13	12

PRINCIPLE 6 – DECENT WORK

Child Labour

CRITERIA 6.2

The Producer must ensure that for hazardous work, the minimum age is 18 years.

Intent

While 'light work' may be undertaken by younger workers from age 13, 'hazardous work' should not be performed by anyone under 18. 'Hazardous work' is work which jeopardises children's physical or psychological well-being, due to the nature or conditions of the work.

INDICATOR

- 6.2.1 The Producer is aware of the activities that constitute hazardous work in the country of operation, and ensures that workers under 18 are not exposed to these activities.



Rationale for change:

Previously, there was no specific indicator for the hazardous work criterion. ILO Convention 182 stipulates the list of activities constituting hazardous work is determined at the national level.

For Guidance on Implementation, please refer to 6.1

PRINCIPLE 6 – DECENT WORK

Forced Labour

CRITERIA 6.3

The Producer must ensure there is ~~Employment is freely chosen~~; no forced or compulsory labour, including bonded or trafficked labour.

Intent

Forced labour is a documented phenomenon in different cotton growing regions. It is a concern in some countries in the form of debt bondage. There are also reports of forced child labour in cotton cultivation in several cotton growing regions.

BCI considers that forced labour is for the most part rooted in poverty, inequality and discrimination, and most often affects vulnerable and unprotected workers. Children, young workers, migrant workers and tribal or ethnic minorities are often among the least protected of workers, and at most risk of forms of coercion tantamount to forced labour. The BCI Criterion on forced labour is therefore closely linked to the Criteria on child labour and non-discrimination.

~~Moreover, it is important to understand the forced labour Criterion in the light of the BCI Enabling Mechanisms, particularly on access to finance. Bonded labour as it occurs in cotton-producing regions reflects a deficient interlocking of labour and credit markets. Workers are indebted to their employer as this in any cases represents the sole source of advance credit available to them. While promoting access to finance by no means represents a simple solution to the multiple challenges around bonded labour, it is commonly viewed as part of an effective package to change the dynamics whereby workers' debts — or indeed those of their parents — restrict their freedom of employment.~~

PRINCIPLE 6 – DECENT WORK

Forced Labour

INDICATORS

6.3.1 Workers' wages are not withheld, and workers are not required to make financial deposits

6.3.2 Workers' identity documents, or valuable personal possessions, are not retained

6.3.3 The movement of workers is not restricted

6.3.4 If loans are made to workers, the terms and conditions of repayment are just and reasonable, a loan agreement is signed by both parties, and any loan repayments are clearly noted in pay records.



Rationale for change:

Previously, no specific indicators existed for Forced Labour. These new indicators are defined based on some of the ILO's indicators of forced

PRINCIPLE 6 – DECENT WORK

Forced Labour

Guidance for implementation:

Forced labour is work exacted under the threat of penalty and for which the person has not offered himself or herself voluntarily. In essence, persons are in a forced labour situation if they enter work or service against their freedom of choice, and cannot leave it without penalty or the threat of penalty. Penalties can be extreme, such as beatings, torture, sexual assault or threats of physical violence, but can also include the withholding of identity documents or wages and threats of deportation.

Another penalty may involve imposing debt on workers (for instance, through large pay advances or transportation fees) that is difficult or impossible to repay on low wages: this is debt bondage, or bonded labour.

The underlying factors that contribute to forced labour and bonded labour include:

- » The use of labour agencies with unreasonable service fees which can be repaid only by continued work
- » Social exclusion, often connected to caste or tribe
- » Asymmetric information, whereby illiterate workers are not aware of their rights and can be taken advantage of
- » Labour migration – particularly the situation of (irregular) migrant workers, who are commonly unaware but also unable to assert their legal labour rights
- » Financial and labour market monopolies, which limits the workers' employment and credit options; inequitable loan or credit schemes managed by the employer
- » In-kind remuneration, which allows employers to exacerbate dependent relations and hide low wage
- » Coercion on the part of state authorities (in a defined number of countries)
- » There may also be situations whereby guards are present on the farm for protection: these guards may protect the farm, but not intimidate or prevent a worker from leaving.

The most important safeguard for all cotton farm employers is to fully disclose terms and conditions of employment prior to workers' recruitment, and to ensure that workers understand these terms.

ILO Conventions and national legislation

The ILO has adopted two conventions on forced labour: The Forced Labour Convention, 1930 (No. 29), and the Abolition of Forced Labour Convention, 1957 (No. 105). These two conventions are among the most widely ratified of the ILO and they are considered as 'fundamental' conventions. The ILO Forced Labour Convention (No. 29) defines forced or compulsory labour as 'all work or service, which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily'. Additionally, forced or compulsory labour performed by under-18s is considered as one of the worst forms of child labour in the Worst Forms of Child Labour Convention, 1999 (No. 182). Forced labour is normally unlawful under national legislation.

PRINCIPLE 6 – DECENT WORK

Non-discrimination

CRITERIA 6.4

The Producer must not practice ~~There is no~~ discrimination (distinction, exclusion, or preference) that denies or impairs equality of opportunity, conditions, or treatment based on individual characteristics and group membership or association.

Intent

Freedom from discrimination is widely recognised as a basic human right. Discrimination at work is harmful to both employers and employees, preventing workers from making their fullest possible contribution to the workplace and impeding the creation of a harmonious, motivated and productive working environment. More broadly, employment discrimination generates socio-economic inequalities that undermine social cohesion and solidarity and slow poverty reduction. Given its fundamental importance, the BCI Criterion on non-discrimination applies to all farms, large and small. BCI also considers the principle of non-discrimination key outside the employment sphere, for instance in the formation and operation of producer groups.

Combating discrimination is an essential part of promoting Decent Work and BCI seeks to ensure equal and respectful treatment in all matters for all workers engaged in cotton cultivation.

INDICATORS

6.4.1 There is no discrimination on the basis of age, ethnicity, nationality, social origin, religion, or any other characteristics that are not related to merit or the inherent requirements of the job

OR

6.4.1 A system is in place to detect and remediate any incidence of discrimination on the basis of age, ethnicity, nationality, social origin, religion, or any other characteristics that are not related to merit or the inherent requirements of the job



PRINCIPLE 6 – DECENT WORK

Non-discrimination

Rationale for change:

Previously, no indicator existed for this criterion except for the 'time-bound plan' indicator for smallholders. The time-bound plan indicator can be retained for smallholders as an additional safeguard, but a more robust indicator is required to ensure fulfilment of the criterion. As the Assurance Program allows for incidental noncompliance, the more robust indicator is still feasible in the smallholder context.

Question 1:

Which option is preferable for the indicator? Is it better to require the absence of discrimination or a system to demonstrate controls against it?

Your Answer:

PRINCIPLE 6 – DECENT WORK

Non-discrimination

6.4.2 The PU has a time-bound plan to improve the position of disadvantaged groups.



6.4.3 A written code of conduct/non-discrimination policy has been communicated to farmers/workers

6.4.4 ~~Existence of women facilitators for specific~~ Specific outreach to women farmers and workers is conducted by women facilitators



6.4.5 Women have access to training

6.4.6 There is no gender-based wage discrimination

~~Inexistence of other form of discrimination (based on age, ethnicity, nationality or social origin, religion, etc.)~~

PRINCIPLE 6 – DECENT WORK

Non-discrimination

Guidance for implementation:

Gender discrimination remains one of the greatest challenges to workplace equality in the cotton sector, partly as a result of pre-existing social attitudes and beliefs about gender roles. Women are frequently paid less than their male equivalents, despite the crucial role that they play in the labour force. Rural women in several smallholder contexts (such as in West Africa or South Asia) provide substantial labour input to the cotton cultivation cycle as ‘unpaid’ family labour or low-paid day labourers. They commonly perform some of the most arduous tasks, with over-representation in manual work such as picking and weeding. In addition, women workers often face significant difficulties in gaining access to credit and their views are often overlooked in decision-making processes as a result of entrenched gender bias in farming families.

Discrimination against indigenous, tribal or migrant workers is another important issue in the cotton sector. Migrant workers and members of ethnic minorities make up a large part of the cotton cultivation labour force in some regions and often face discrimination in relation to wages, working conditions and health and safety (e.g. performing more difficult tasks over longer working hours for less pay). These groups are particularly vulnerable to discrimination for a number of reasons. They may not have a strong awareness of their employment rights and may not even be eligible for the same protection under national legislation as citizens or permanent residents. Poverty, lack of proficiency in the local language and cultural misunderstanding may also invite prejudice and unfair treatment.

PRINCIPLE 6 – DECENT WORK

Freedom of Association and Collective Bargaining

CRITERIA 6.5

The Producer must guarantee all workers and employers the right to set up and join organisations of their own choosing, and to draw up their own constitutions and rules, elect representatives, and formulate programmes.

Rationale for change:

Proposal to remove "employers" as it does not make sense to require employers to guarantee their own rights. Although the freedom of association of "employers" is also referenced in the relevant ILO Conventions, in this case the Employer effectively is "The producer" on which the responsibility of compliance lies.

Intent

BCI recognises the fundamental importance of the right of association in order to represent and defend interests, and considers this right to enable to effective realisation of other labour rights. Freedom of association paves the way for improvements in social and labour conditions, for example through collective bargaining.

~~Within the global cotton context, however, this right takes on different inflections, given that in many producer countries in the developing world, cotton work is performed by smallholders who are neither exclusively 'employers' or 'employees'.~~

INDICATORS

6.5.1 A policy is available stating workers right to set up and join organisations of their choosing, and to draw up their own constitutions and rules, elect representatives, and formulate programmes

OR



PRINCIPLE 6 – DECENT WORK

Freedom of Association and Collective Bargaining

6.5.1 There is no evidence of interference with the establishment and growth of workers' organisations or their activities.

Rationale for change:

Previously, there was no specific indicator for this freedom of association criterion, and the criterion was not applicable to smallholders. This criterion/indicator should be applicable to all farmer categories, as smallholders also employ workers in many cases, and these workers lack visibility.

Question 2:

It is commonly considered that the best indicator that there is genuine freedom of association is that a significant proportion of the workforce are members of an appropriate independent trade union, however, this does not make sense as a minimum requirement as not all contexts will have a relevant trade unions, and the cotton sector has many informal workers. Which of the indicator options is preferred?

- » Should the Producer be required to have a policy, or
- » Should this be more of a passive indicator based on the absence of obstacles? Or,
- » Should the Producer be required to take a more proactive approach than is presented in either option (measures are taken to facilitate the establishment...etc., based on language of ILO Recommendation 163)?

Your Answer:

PRINCIPLE 6 – DECENT WORK

Freedom of Association and Collective Bargaining

Guidance for implementation:

Freedom of association refers to the right of workers and employers to freely form or join organisations that promote and defend their interests at work, without interference. The right to organise applies to all workers and employers, including persons in the informal economy.

Collective bargaining is a voluntary process through which employers (or their organisations), and trade unions (or in their absence, workers' representatives) discuss and negotiate their relations and interaction at the workplace.

The term 'workers' organisation' as used in the Decent Work Principle refers to any organisation of workers with the aims of furthering and defending the rights and interests of workers. BCI considers independent trade unions the best means for achieving this. The recognition of a workers' organisation for the purposes of representation and negotiation would typically take the form of the employer recognising in writing – and in practice – the right of all workers to establish and to join workers' organisations of their own choosing and to collectively negotiate their working conditions.

The key reference points in this area are ILO Conventions No. 87(Freedom of Association and Protection of the Right to Organise Convention, 1948) and No.98 (Right to Organise and Collective Bargaining Convention 1949). A more specific Convention (No. 141) relating to rural workers was adopted by the ILO in 1975. This convention provides that all categories of rural workers, whether they are wage earners or self-employed, shall have the right to establish and to join organisations of their own choosing.

~~BCI follows ILO Conventions 87 and 98. This entails that 'workers and employers, without distinction whatsoever, shall have the right to establish and, subject only to the rules of the organization concerned, to join organisations of their own choosing without previous authorisation. Workers' and employers' organisations shall have the right to draw up their constitutions and rules, to elect their representatives in full freedom, to organize their administration and activities and to formulate their programmes'.~~

PRINCIPLE 6 – DECENT WORK

Freedom of Association and Collective Bargaining

CRITERIA 6.6

The Producer must guarantee all ~~Smallholders (including tenants and sharecroppers and other categories)~~ tenants and sharecroppers the right on a voluntary basis to establish and develop organisations representing their interests

Rationale for change:

Smallholders are a distinct farmer category, and the granting of rights to smallholders is not under the purview of medium farms or large farms. It also does not make sense to require smallholders to guarantee their own rights. The relevant categories for this criterion are therefore tenants and sharecroppers..

Question 3:

Does it make sense to devote a criterion to freedom of association for tenants and sharecroppers (are there risks around this issue)? Would it be sufficient to just have 6.5 on freedom of association for “workers”, as long as BCI’s worker definition clearly included sharecroppers and tenants?

Your Answer:

Intent

~~In the context of family smallholdings where the majority of labour inputs derive from family members, organisation logically relates in the first instance to producer organisation. For this reason, the first Criterion on the right to association under the Decent Work Principle – and the only Criterion which applies to self-employed smallholders, as well as tenants and sharecroppers – refers to the right of smallholders to form and join organisations. This in no way contradicts the vital importance of worker organisation – captured in the following Criteria – but rather reflects the structure of the Principle, in which the initial Criterion applies to all production systems, including those where there are no external hired labour inputs.~~

Intent to be revised following consultation.

PRINCIPLE 6 – DECENT WORK

Freedom of Association and Collective Bargaining

INDICATORS

6.6.1 A policy is available stating the right of tenants and sharecroppers to establish and develop organisations representing their interests.

OR

6.6.1 There is no evidence of interference with the establishment and growth of organisations representing the interests of tenants and sharecroppers.



Rationale for change:

No previous indicator for this criterion

For Guidance on Implementation, please refer to 6.5

PRINCIPLE 6 – DECENT WORK

Freedom of Association and Collective Bargaining

CRITERIA 6.7

The Producer must guarantee all workers ~~and employers~~ the right to bargain collectively.

Intent

~~This~~ The process of **collective** bargaining aims to reach mutually acceptable agreements on issues including wages, contracts of employment, hours of work, leave, occupational health and safety, and so on. The ability for workers to bargain collectively with their employers is a major factor influencing workers' terms and conditions of employment.

INDICATORS

6.7.1 A policy guaranteeing workers the right to bargain collectively is available, and has been communicated to workers

OR

6.7.1 There is no evidence of interference with the right of workers to bargain collectively.



Rationale for change:

No previous indicator for this criterion.

For Guidance on Implementation, please refer to 6.5

PRINCIPLE 6 – DECENT WORK

Freedom of Association and Collective Bargaining

Question 4:

Please refer to the questions for 6.5.1 as they also apply here.

Since the criterion is only applicable to MFs and LFs, in this case option 1 also includes a requirement that the policy is communicated to workers. Does the inclusion of a requirement on communication of the policy pose any obstacles for implementation?

Your Answer:

PRINCIPLE 6 – DECENT WORK

Freedom of Association and Collective Bargaining

CRITERIA 6.8

The Producer must guarantee all workers ~~have~~ the right to belong to a trade union and carry out lawful union activities without any fear of anti-union discrimination.

Intent

Given the low rates of union density in any cotton production setting other than large-scale plantations, BCI has opted to iterate the fundamental right for workers to enjoy adequate protection against acts of anti-union discrimination solely in the context of medium and large farms. This in no way reflects a belief on the part of BCI that such discrimination is acceptable in other settings, but rather a desire to formulate standards which speak most directly and concisely to the particular context of farming to which they apply. It is also important that producer employer allows trade unions not based at the farm to meet and share information with the workforce at an agreed time and place without the interference of farm management

INDICATORS

6.8.1 Estimated number of farms with workers members of a trade union

6.8.2 Estimated number of farms with providing access and reasonable facilities for workers' representatives.

6.8.3 The % employees that are members of a Trade Union

6.8.4 Frequency at which-The Producer, or a senior staff member,-meets regularly with employees?



PRINCIPLE 6 – DECENT WORK

Freedom of Association and Collective Bargaining

6.8.5 ~~Do~~ Union representatives visit the farm.

6.8.6 Union representatives have dedicated facilities available to them



For Guidance on Implementation, please refer to 6.5

Rationale for change:

Indicators 6.8.2, 6.8.5 and 6.8.6 were previously related to a separate criteria (related to access to facilities). It is proposed to merge all under this criteria 6.8

PRINCIPLE 6 – DECENT WORK

Producer Empowerment

CRITERIA 6.9

The Producer must promote the development and strengthening of relevant forms of producer organization.

Rationale for change:

The existing performance scale indicators on producer organisation do not correspond to any generic criteria. It was necessary to create a new generic criterion for these indicators.

Intent

To be drafted following public consultation

INDICATORS

6.9.1 The Producer Unit has a program in place (or is part of a program) to develop effective producer organisation and/or strengthen existing ones

6.9.2 Estimated number of farms in the Producer Unit members of producer organisation

6.9.3 Number of basic services provided by the producer organisation to their members (e.g. marketing, inputs, extension, storage, credit, market information, processing, etc.)

6.9.4 Estimated number of Producer organisations with women holding a position of responsibility (e.g. decision making position, board membership, etc.)



PRINCIPLE 6 – DECENT WORK

Producer Empowerment

6.9.5 The Producer is member of a local producer (grower) organisation

6.9.6. Number of meetings of the local producer (grower) organisation attended in the last 12 months?



~~The Producer is member of the management of the organisation~~

Rationale for change:

Proposal to remove this improvement indicator since by definition, all producers cannot be part of their Producer Organisation management.

Guidance for implementation: *(to be drafted following public consultation)*

PRINCIPLE 6 – DECENT WORK

Health and Safety

CRITERIA 6.10

The Producer must provide access to potable and washing water.

Intent

Health and Safety constitutes another key component of Decent Work central to a productive and sustainable agriculture.

INDICATORS

6.10.1 Estimated number of farms with drinking and washing water facilities placed within reasonable proximity to the workplace and accessible to all



6.10.2 All ~~employees-workers-~~ have access to potable and washing water



6.10.3 ~~Do you regularly test~~ The quality of the drinking water is tested regularly



Guidance for implementation: (to be drafted following public consultation)

PRINCIPLE 6 – DECENT WORK

Health and Safety

CRITERIA 6.11

The Producer must provide workers with ~~receive~~ regular health and safety training appropriate to the work that they perform.

Intent

Most work related accidents and illness are preventable. Given the nature of activities in the cotton cultivation cycle, worker and farmer health and safety is a critical issue in cotton farming.

The key risks for worker health and safety are that workers – family or hired, depending on regional context – are exposed to harmful toxins. This has grave implications for women farmers/workers, in particular, in terms of the impact of pesticides on women's reproductive health. Training enables workers to work more safely in the context of the hazards that they are presented with. The appropriate level of training to be made available to ~~employees of smallholders, medium farms, and large farms workers~~ will depend largely on context and is most likely to be provided as part of an Integrated Pest Management Programme, described under the Crop Protection Principle above. In the case of certain key hazardous tasks, including spraying, working with hazardous chemicals, substances and materials and other potentially hazardous tasks such as operating vehicles and other machinery, good practice entails that workers' participation in training is formally recorded and regularly reviewed.

INDICATORS

6.11.1 Estimated number of farms with health and safety policy available and communicated to workers?

6.11.2 Estimated number of farms with formal workers training program that covers all relevant workplace health and safety requirements



PRINCIPLE 6 – DECENT WORK

Health and Safety

6.11.3 A written occupational health and safety policy is available at the farm and has been communicated to workers

6.11.4 ~~Do you have~~ The Producer has formal staff induction and training program for new employees that covers all relevant workplace health and safety requirements



Guidance for implementation:

BCI follows ILO Convention 155 which aims 'to prevent accidents and injury to health arising out of, linked with or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment'.

The other key international reference points for labour standards in this area are the Safety and Health in Agriculture Convention 2001 (No.184), and the Plantations Convention, 1958 (No. 110). In particular, Convention 184 covers preventive and protective measures regarding machinery safety, handling and transport of materials, chemicals management, animal handling, and the construction and maintenance of agricultural facilities. Other provisions address the specific needs of young workers, temporary and seasonal workers, and of women workers before and after childbirth.

National legislation will typically establish minimum standards for policies and practices on health and safety in agriculture which will apply to the cotton sector, although this is not the case in all cotton producer countries. Where national legal requirements on occupational health and safety are more comprehensive than the Criteria above, as is the case in many producer states, these statutory standards must be met.

PRINCIPLE 6 – DECENT WORK

Health and Safety

CRITERIA 6.12

The Producer must ~~Employers meet their workers' basic requirements, as specific above, and including~~ provide all workers with safe and hygienic sanitation facilities, a clean place to eat, and access to adequate medical care at no charge.

Intent

To be drafted following public consultation

INDICATORS

6.12.1 Estimated number of farms providing to workers a clean place to eat, clean toilets, potable drinking water, adequate living quarters (if they reside on the farms) and access to adequate medical care at no charge

6.12.2 All ~~employees~~ workers have access to a clean place to eat, clean toilets, potable drinking water, adequate living quarters (if they reside on the farms) and access to adequate medical care

6.12.3 All employees receive regular (at least annual) medical examinations at the employer's expense, or are provided with benefits covering medical examinations.

SH
✓ M:
LF

SH
M:
✓ LF

Rationale for change:

Feedback from certain contexts has highlighted the fact that there is no precedent for farms providing employees with medical examinations, but there is a precedent for medical benefits to be provided as part of the employee contract.

For Guidance for Implementation, refer to 6.13

PRINCIPLE 6 – DECENT WORK

Health and Safety

CRITERIA 6.13

The Producer must ~~Employers~~ identify work hazards, inform workers of safe work practices, and adopt preventive measures to minimise hazards in the workplace. The Producer must ~~Employers~~ maintain records of any accidents and occupational diseases

Intent

Work processes, workplaces, machinery and equipment on the farm should be as safe as reasonably practicable. Medium and large farms are expected to carry out a formal risk assessment of health and safety issues to identify risk areas and potential hazards.

INDICATORS

6.13.1 Estimated number of farms who have conducted a formal assessment of all potential workplace hazards that has led to safe work practices procedures being established for all hazards



6.13.2 A formal assessment of all potential workplace hazards, involving ~~workers~~ **employees**, has been conducted and has led to the establishment of safe work practice procedures for all hazards.



6.13.3 Records are maintained of any accidents and occupational diseases

For Guidance for Implementation, refer to 6.13

PRINCIPLE 6 – DECENT WORK

Health and Safety

CRITERIA 6.14

The Producer must ~~Employers~~ ensure that measures are in place to deal with accidents and emergencies, including first aid and access to appropriate transportation to medical facilities

Intent

To be drafted

INDICATORS

6.14.1 Estimated number of farms with accident and emergencies procedures including first aid and access to appropriate transportation to medical facilities

SH
✓ M:
LF

6.14.2 ~~Do you have~~ The Producer has an accident and emergency procedure including first aid and access to appropriate transportation to medical facilities

SH
M:
✓ LF

For Guidance for Implementation, refer to 6.13

PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.15

The Producer must ensure that waged workers are paid wages at least equivalent to the applicable legal national minimum wage or regional norm, whichever is higher

Intent

In general, wages in the agricultural sector are low and many agricultural workers live below the poverty line. Wages may be affected by conditions beyond workers' control, such as adverse weather conditions, which mean that workers are not paid for unproductive time. Many workers may need to work long hours to earn a basic wage, especially where they rely on piece work rates. To protect these workers, national labour legislation and collective agreement may establish a minimum wage, a minimum monetary rate that employers may pay employees for their labour. It is often expressed as an hourly rate and may vary across sectors or regions. However, the agricultural sector is often exempted from the requirement to pay a minimum wage, or may be subject to a lower rate. Alternatively, certain categories of workers that are common in agriculture may be excluded from minimum wage protection, such as casual, piece-rate and seasonal workers. Regional wage norms may exceed the legal minimum wage, particularly where minimum wage rates are low and insufficient to meet basic needs, and workers should be paid whichever is higher. Where workers rely on piece work rates, it is important that this rate permits them to earn at least the minimum wage or regional norm.

INDICATORS

6.15.1 The Producer is aware of the legally applicable minimum wage/s (statutory national or regional minimum wage applicable to agriculture, collectively agreed wage, industry minimum)

6.15.2 The wage rate paid to workers by the Producer relative to the applicable minimum wage



PRINCIPLE 6 – DECENT WORK

Employment Conditions

Rationale for change:

The previous indicator needed to be converted to a statement for the standard. The multiple choice question can still be retained for the self assessment. Use of employees in the indicator was not consistent with the use of workers in the criterion

Guidance for implementation:

Wages are undoubtedly among the most important working conditions, with an obvious and critical link to the living standards of workers and their families. The term ‘wages’ refers to the total remuneration paid to workers for their labour, including monetary compensation provided on an hourly, daily, weekly or monthly basis, piece work rates, bonuses and in-kind payments, such as food and housing. Piece work rates are wage payments on the basis of a fixed rate according to units or actions completed, such as a certain amount of cotton picked, rather than on the basis of time worked.

BCI does not consider it appropriate to determine ‘cash standards’ for cotton production, such as wages and working hours. Collective and individual agreement establishes these in national legislation, collective bargaining agreements and individual contracts of employment. BCI requires producer-employers to comply with national employment legislation and that national legislation prevails where it sets higher standards on particular issues than the BCI Criteria.

A number of ILO conventions set standards relating to working conditions; these are directed towards legislating governments. Agricultural workers are not covered by the two main conventions on hours of work (ILO C1 and C30) or weekly rest (C14 and C106). In terms of wages, Convention C 99 requires states to establish minimum wages for the agricultural sector; the Equal Remuneration Convention, 1951 (No. 100) lays down the principle of equal remuneration for men and women workers for work of equal value (see ‘Discrimination’ above). The Plantations Convention, 1958 (No. 110) deals with conditions of employment of plantation workers. It covers conditions of work, contracts of employment, collective bargaining, methods of wage payment, paid leave, weekly rest, maternity protection, accident compensation, freedom of association, labour inspection, housing and medical care. It also covers the recruitment and engagement of migrant workers.

PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.16

The Producer must ensure that where workers are paid at a piece rate, this rate permits the worker to earn the applicable national minimum wage or regional norm (whichever is higher) during normal working hours and under normal operating conditions

Intent

To be drafted

INDICATORS

6.16.1 Estimated number of farms providing piece rate adequate for workers to earn the applicable national minimum wage or regional norm (whichever is higher) during normal working hours and under normal operating conditions?

SH
✓ M:
LF

6.16.2 If any employees are paid on a piece rate basis, the rate is adequate for workers to earn the applicable national minimum wage or regional norm (whichever is higher) during normal working hours and under normal operating conditions

SH
✓ M:
LF

For guidance on implementation, see 6.17

PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.17

The Producer must that workers are paid regularly ~~in cash or in a form that is convenient to them~~ in the form requested by them (cash, bank transfer, or cheque).

Rationale for change:

It has been highlighted that in some contexts, eg USA, paying workers in cash is a method of avoiding formal employment for tax purposes, and therefore should not be the favoured form of payment. The proposed change prioritises the request of the worker.

Intent

Wages should be paid regularly and on time. In extreme situations, debt bondage or forced labour can arise where wages are not paid for long periods of time. This can also be a problem if a large component of wages consists of in-kind payment rather than cash, as reduces workers' discretionary income and their freedom to decide on how to meet their own needs. Consequently, the provision of in-kind payment is often strictly regulated by national legislation or collective agreement and restricted to a percentage of the overall wage.

INDICATORS

6.17.1 Estimated number of farms with wage records showing that workers are paid regularly in the form requested by them

6.17.2 Wage records show that workers are paid regularly in the form requested by them



For guidance on implementation, see 6.17

PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.18

The Producer must observe the principle of equal pay for equal work ~~is observed.~~

Intent

To be drafted

INDICATORS

6.18.1 Estimated number of farms providing equal wages to people who perform the same job, irrespective of gender

6.18.2 Equal wages are paid to people who perform the same job, irrespective of gender.



Guidance for implementation:

The principle of equal pay for work of equal value means that men and women are paid the same rate for performing work that is the same, broadly similar or of comparable value. Determining whether jobs are of comparable value can be complex, but rates should be established without reference to gender. 'Pay' should be understood as a broad concept that includes all payments, including basic wages, bonuses and non-monetary benefits.

Guidance for implementation: to be drafted

PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.19

The Producer must obtain the worker's consent ~~is obtained~~ in advance regarding all working conditions

Intent

To be drafted

INDICATORS

6.19.1 Estimated number of farms ~~aware of minimum legal requirements on working conditions for farm workers~~ that consult with workers about working conditions (including requirements relating to working hours and overtime) as part of the hiring process



6.19.2 Workers are consulted about working conditions (including requirements related to working hours and overtime) as part of the hiring process. ~~The Producer is aware of the minimum legal requirements on working conditions for farm workers (including requirements relating to working hours and overtime).~~



Rationale for change:

The exact same indicator P26/P32 (Awareness of the minimum legal requirements on working conditions for farm workers) is listed for criterion 6.23 (now 6.24)

The indicator for 6.21 should focus on worker consultation

PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.20

The Producer must employ workers ~~are employed~~ under legally binding (preferably written) contracts of employment.

Intent

An employment contract is an agreement between the employer and the employee on the employee's basic terms and conditions of employment. In general, contractual arrangements in the agricultural sector tend to be concluded verbally rather than in writing.

INDICATORS

6.20.1 Estimated number of farms with workers employed with written contract



6.20.2 The % of employees with a written contract



PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.21

The Producer must keep adequate records ~~are kept~~ which are in accordance with national law and sufficient to enable monitoring. ~~but in any event sufficient to enable monitoring~~

Intent

To be drafted

INDICATORS

6.21.1 Estimated number of farms keeping records on the following:

- i) details on legal requirements for wages, including rates, working hours and overtime requirements
- ii) information on wages (including form of payment)
- iii) date of birth (age),
- iv) gender,
- v) working times (working hours and overtime)
- vi) date of entry and period of employment
- vii) number of permanent/seasonal workers.



6.21.2 Records are kept on the following:

- i) details on legal requirements for wages, including rates, working hours and overtime requirements
- ii) information on wages (including form of payment)
- iii) date of birth (age),
- iv) gender,
- v) working times (working hours and overtime)
- vi) date of entry and period of employment



PRINCIPLE 6 – DECENT WORK

Employment Conditions

vii) number of permanent/seasonal workers.

Guidance to be drafted



PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.22

The Producer must ensure that temporary, seasonal, and (sub-) contracted workers receive equivalent benefits and employment conditions to permanent workers in relation to their period of employment

Intent

The content of contracts in the agricultural sector varies hugely, as a result of the wide variety of employment and other working relationships; for example, seasonal, daily and permanent employment; task or piece rate work; sharecropping or contract farming. Temporary working arrangements, such as seasonal, casual, daily, and contract labour, are prevalent in the agricultural sector. Workers under these arrangements do not enjoy the length of tenure or employment security as permanent workers, but should receive equivalent benefits and employment conditions relative to their period of employment, such as wages, overtime payments, rest times and health and safety protection.

INDICATORS

6.22.1 Estimated number of farms with a policy on the treatment of ~~that deals with how~~ temporary, seasonal and (sub-)contracted workers ~~are treated~~



6.22.2 A policy ~~that deals with~~ on the treatment of temporary, seasonal and (sub-) contracted workers is available



PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.23

The Producer must ensure that working hours comply with national laws or relevant collective agreements, whichever is more favourable to the worker

Intent

Working hours are another basic working condition with a strong impact on workers' health and quality of life. Maximum limits for daily and weekly working hours, rest times, shift time and overtime are often set by national legislation, although the agricultural sector is commonly exempted from these laws. This is an important gap in the protection of agricultural workers, as many workers regularly perform arduous manual labour for long hours, which can be extended further during peak periods such as planting and harvesting. Despite health risks, workers may request these longer hours and even forego rest days in order to raise their income. Overtime hours must always be carried out with due regard for requirements in national legislation and collective agreements, including wage rates and health and safety.

INDICATORS

6.23.1 Estimated number of farms aware of minimum legal requirements and relevant collective agreements on working hours and overtime. ~~conditions for farm workers (including requirements relating to working hours and overtime)~~

6.23.2 Estimated number of farms with records documenting the number of hours of normal time and overtime for each worker



PRINCIPLE 6 – DECENT WORK

Employment Conditions

Rationale for change:

Relevant collective agreements is included in the criterion, so should also be mentioned in the indicator. Indicator should be specific to working hour

Proposal to create additional indicators requiring tangible evidence of implementation

6.23.3 The Producer is aware of the minimum legal requirements and relevant collective agreements on working hours and overtime

6.23.4 Normal working hours are displayed clearly in a place accessible to all workers

6.23.5 Records documenting the number of hours of normal time and overtime for each worker are available

Rationale for change: see above

Guidance for implementation: to be drafted

SH
M:
LF



PRINCIPLE 6 – DECENT WORK

Employment Conditions

CRITERIA 6.24

The Producer must ensure that overtime work is voluntary and remunerated in accordance with the law or applicable collective agreements

Intent

To be drafted

INDICATORS

~~6.24.1 Estimated number of farms aware of the legally applicable minimum wage/s (statutory national or regional minimum wage applicable to agriculture, collectively agreed wage, industry minimum)?~~

~~Estimated number of farms with employees paid more than 15% higher than the applicable minimum wage?~~

~~Are you aware of the legally applicable minimum wage/s (statutory national or regional minimum wage applicable to agriculture, collectively agreed wage, industry minimum)?~~

6.24.1 Estimated number of farms maintaining records documenting each worker's willingness to work overtime

6.24.2 Estimated number of farms paying overtime hours at a premium, in line with legal requirements



PRINCIPLE 6 – DECENT WORK

Employment Conditions

6.24.3 Records documenting each worker's willingness to work overtime are maintained

6.24.4 Overtime hours are paid at a premium, in line with legal requirements



Rationale for change:

Previous indicators are used for 6.16 (previously 6.15) on minimum wage. Indicators specific to overtime should be introduced.

PRINCIPLE 6 – DECENT WORK

Basic treatment and disciplinary practices

CRITERIA 6.25

The Producer must not ~~Employers do not~~ engage in or tolerate the use of corporal punishment, mental or physical coercion, sexual or other harassment or physical or verbal abuse of any kind

Intent

It is essential that every employee is treated with respect and dignity. While this may be self-evident, BCI considers it important to explicitly address this issue within the Decent Work Principle in order to reflect the importance of fairness and transparency in disciplinary practices.

Disciplinary practices are often regulated by national legislation, although the degree and nature of coverage varies considerably by country. In particular, many countries have specific national legislation making abuse in the workplace a criminal offence, as well as requirements that must be complied with where disciplinary measures lead to dismissal. It should also be noted that collective agreements often contain clauses on disciplinary procedures. The ILO does not have a specific convention addressing disciplinary practices. However, different UN agreements are relevant, such as the Universal Declaration of Human Rights, and most voluntary initiatives for managing working conditions in supply chains contain standards on disciplinary procedures.

INDICATORS

6.25.1 A policy prohibiting corporal punishment, mental or physical coercion, sexual or other harassment or physical or verbal abuse of any kind, is in place and has been communicated to the workforce.



Guidance for implementation to be drafted

PRINCIPLE 6 – DECENT WORK

Basic treatment and disciplinary practices

CRITERIA 6.26

The Producer must have a transparent ~~and clear~~ policy and system for disciplinary measures, and must ~~and this is~~ communicate this to workers

Intent

Fair disciplinary procedures not only help to eliminate inhumane treatment of workers: they are a basic tool for sound people management that help to create a productive and harmonious workplace. In the case of medium and large farms, policies on disciplinary practices should provide a clear statement of what constitutes acceptable behaviour in the workplace and establish a fair and transparent framework to follow where there are allegations of misconduct. This ensures that all workers are aware of their rights and receive fair and consistent treatment.

INDICATORS

6.26.1 A policy for disciplinary measures is available, and the system in place for disciplinary measures includes fair warning principles

6.26.2 Any disciplinary actions are proportionate to the conduct in question

6.26.3 Workers are aware of the policy and system for disciplinary measures



PRINCIPLE 6 – DECENT WORK

Basic treatment and disciplinary practices

Rationale for change:

Previously, no indicators defined for this criterion.

GENERAL COMMENT:

Do you have any other general or specific comment to make on this principle?

Yes ☐

No ☐

If yes, please develop:

PRINCIPLE 7 - MANAGEMENT

BETTER COTTON FARMERS OPERATE A MANAGEMENT SYSTEM

Introduction to the Principle:

The management system functions as the backbone of the standard—it supports the achievement of the other 6 principles and criteria. BCI's standard system places special emphasis on driving change through continuous improvement, and on demonstrating results through the annual collection of field level data. The Standard System also utilises self-assessment as the most fundamental assurance mechanism, shifting the primary responsibility for assessing and reporting on performance to the Producer. These unique features of BCI's approach depend upon effective management at the Large Farm or Producer Unit level. Management activities are essential to ensuring that farmers are trained to adopt improved practices, that risks to noncompliance are identified and remediated, that progress against production criteria is monitored and assessed, and that field level data is accurately maintained and systematically reported.

The management system also plays a vital role in safeguarding the credibility of the group assurance model used for smallholders and medium farms. Smallholders and medium farms are organised into Producer Units and receive licences at the Producer Unit level. The internal management system coordinated by the Producer Unit Manager instils confidence that the individual farmers in the unit are adopting the practices promoted through training and fulfilling the requirements of the standard. Internal monitoring maintains the integrity of the self-assessment process by reflecting the consistency of farmer performance across the group. Management activities require ongoing farmer engagement and the promotion of self-regulation, creating a sense of ownership amongst Producer Unit members.

While it is the responsibility of the Producer to determine and structure management activities in a way that fits their needs, BCI has defined a set of common criteria considered to be the essential components of a quality management system.

PRINCIPLE 7 - MANAGEMENT

NOTE : Principle 7 has not been entirely reviewed by the BCI Standard Setting committee and is therefore incomplete. Besides, further guidance documents on critical parts of the Principle (e.g. Continuous improvement plan” are still in development. “Intent” and “guidance” sections will be therefore further developed soon and open to review for the second round of public consultation. In the meantime, you are of course very much welcome to provide suggestion on how this new Management principle should be designed.

PRINCIPLE 7 - MANAGEMENT

Capacity building

CRITERIA 7.1

The Producer must strengthen staff capacity through training.

Intent

To be completed

INDICATORS

7.1.1 The PU Manager has been trained by BCI and completed any subsequent training (as required by BCI).

7.1.2 The skills and competencies of Field Facilitators are developed through ongoing training



PRINCIPLE 7 - MANAGEMENT

Training the trainer

CRITERIA 7.2

The Producer must ensure that farmers and workers receive regular training on practices to achieve the minimum production criteria and relevant Continuous Improvement Plan targets

Intent:

To be completed

- 7.2.1 A training plan identifying production criteria, PU/LG Codes, target groups, name of training provider(s), and scheduling, is available
- 7.2.2 The PU Manager operates a system to ensure workers (family or hired) are identified and trained on all relevant aspects of Decent Work
- 7.2.3 Training materials for farmers are available to cover all of the Minimum Production Criteria and aspects of the Continuous Improvement Plan relevant to the current season



Guidance for implementation:

To be completed

PRINCIPLE 7 - MANAGEMENT

Continuous Improvement Plan

CRITERIA 7.3

The Producer must develop and implement a Continuous Improvement Plan

Intent:

This Criteria and its indicators indicate that the management plan must be prepared and approved prior to the start of new management activities.

It covers the whole process of management planning. That is the setting of policies (visions and values) and corresponding objectives, development and implementation of corresponding management plan, evaluation of success in achieving defined objectives and revision of management plans and information.

The design of the management planning depends on the farmer category and objectives of The Producer. This ensures that every type of farmers has planning and a management system, but provides flexibility to adapt these to the type and situation of management area and the objectives of The Producer.

The amount of documentation needs to be sufficient to guide staff in the implementation of the management plan, to provide justification of management decisions to internal and external verification.

‘Continuous improvement’ is defined as a systematic process of continually improving management policies and practices by learning from the outcomes of existing measures (see Terms and definition).

- 7.3.1 A documented plan identifying time-bound objectives and measures of success for selected production criteria is available and kept up to date based on monitoring
- 7.3.2 The Continuous Improvement Plan is reviewed annually to integrate lessons learnt from the past year and corrective actions and/or recommendations identified during external assessment



PRINCIPLE 7 - MANAGEMENT

Review and Monitoring

CRITERIA 7.4

The Producer must monitor and review levels of adoption, risks of noncompliance, and implementation of corrective actions at the Learning Group [farm for MFs] level

Intent:

To be completed

INDICATORS

- 7.4.1 The Producer Unit Manager operates a system to:
- assess the level of adoption of practices promoted in training; and
 - identify and address risks associated with implementation or potential noncompliance; and
 - Plan/Enforce implementation of Corrective Actions resulting from monitoring activities



Guidance for implementation:

PRINCIPLE 7 - MANAGEMENT

Data management

CRITERIA 7.5

The Producer must coordinate a data management system

Intent:

To be completed

INDICATORS

- 7.5.1 PU data (name and contact information of PU Manager, number of farmers (M/F), list of Learning Groups, number of workers (M/F), expected seed cotton production, name of gins, etc.) is updated annually at the latest one month after sowing.
- 7.5.2 The PU Manager operates a system to ensure that farmers can maintain a farmer field book and learn from it.
- 7.5.3 The PU Manager operates a system to collect, compile and report accurate Results Indicator data from farmer to Learning Group, from LG to PU, and from PU to BCI
- 7.5.4 Annual data on number of farmers and workers trained in the PU by gender / topic/ methodology is reported to BCI.



Guidance for implementation:

To be completed

PRINCIPLE 7 - MANAGEMENT

Data management

GENERAL COMMENT:

Do you have any other general or specific comment to make on this principle?

Yes ☐

No ☐

If yes, please develop:

DRAFT