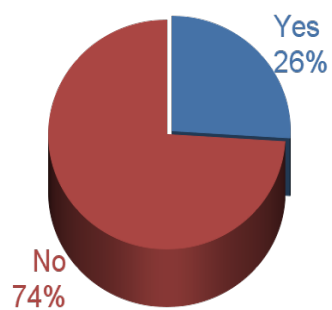


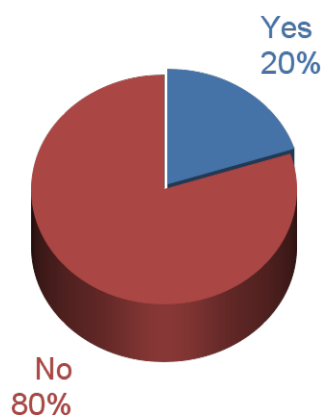
# **BCI Stakeholder consultation report**

## **- First round-**

## 2. Are you an implementing partner?



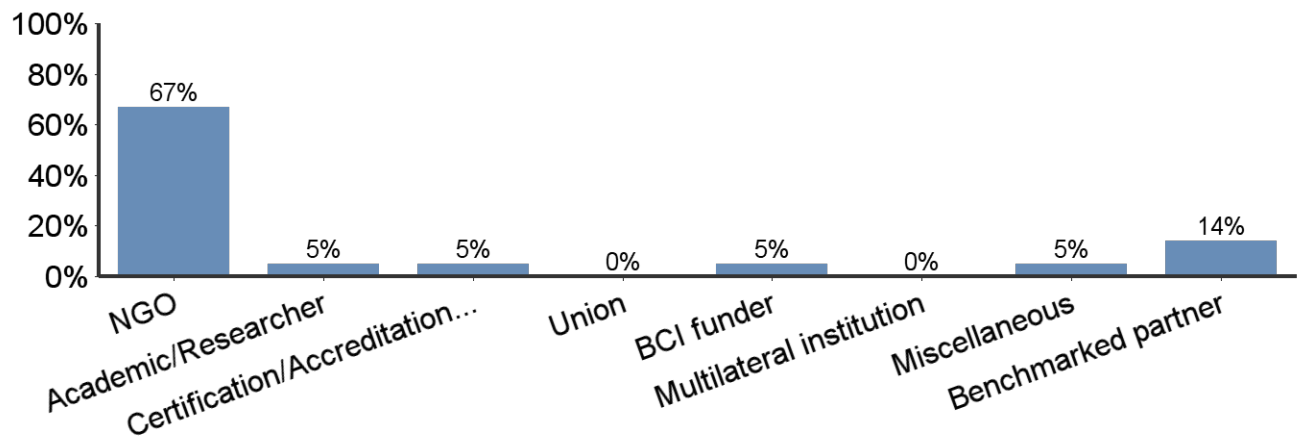
## 3. Are you a BCI staff?



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

#	Answer	Bar	%
1	Producer	<div></div>	11%
2	Ginner	<div></div>	3%
3	Brand		0%
4	Retailer		0%
5	Spinner		0%
6	Trader		0%
	Total		100%

### 4. Other, please specify:

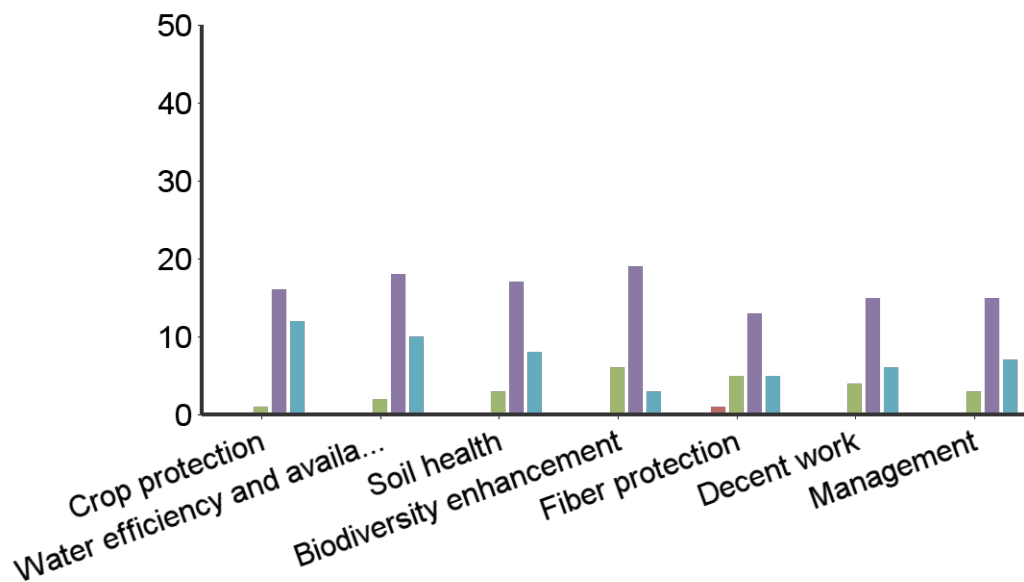


Are you a BCI member?			
#	Answer	Bar	%
1	Yes	<div></div>	47%
2	No	<div></div>	53%
	Total		100%

If you are a BCI member please select your category			
#	Answer	Bar	%
1	Civil Society	<div></div>	44%
2	Retailers and Brands		0%
3	Producers	<div></div>	25%
4	Suppliers and Manufacturers	<div></div>	6%
5	Associate members	<div></div>	25%
	Total		100%

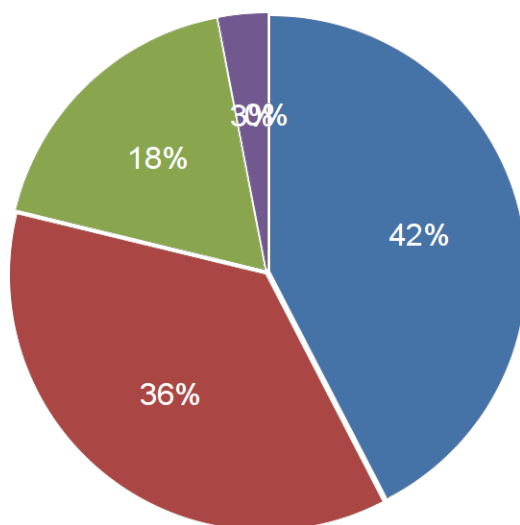
**In your opinion, what sustainability aspects deserve special attention during the standard revision?  
How important are each of them?**

■ Not at all Important    ■ Not so important    ■ Neither Important nor Unimp...  
■ Very Important    ■ Extremely Important



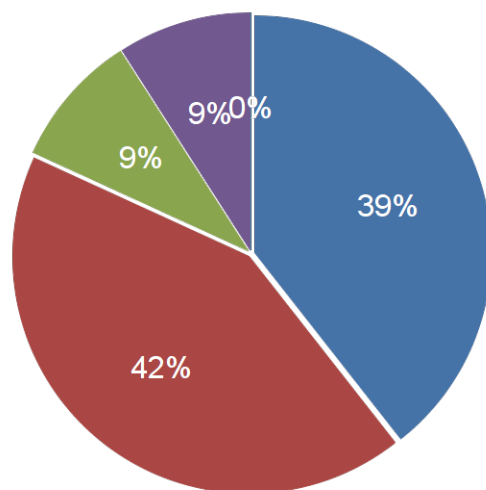
**Please indicate your perception of the knowledge you have about Cotton production practices in general?**

■ 1 Strong knowledge    ■ 2    ■ 3    ■ 4    ■ 5 Weak knowledge





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

■ 1 Strong Knowledge   ■ 2   ■ 3   ■ 4   ■ 5 Weak Knowledge



## **PREAMBLE**

**Question 1 - p. 8****Do you agree with all aspects presented in the “History and objectives” section?**

#	Answer	Bar	Response	%
1	Yes		22	95.65%
2	No		1	4.35%
3	I don't have an opinion		0	0.00%
	Total		23	100.00%

**Please explain your answer**

Name of your organization	Comment
WWF	As mentioned above BCI needs to clearly differentiate certification conditions for small-holders and large farmers. Large farmers need to have a higher number of mandatory requirements but still small-holders also need to have mandatory requirements for the critical principles. BCI also needs to more clearly show how the improvement requirements are monitored towards real improvement.
Israel Cotton Board (ICB)	Methodology adopted makes sense. Baseline Codes of Practice are appropriate; Principle of continuous improvement in standards revision is good practice
Freelance - Certified Better Cotton Trainer	The document is not very easy to read, required me to get back to diverse topics and re-read to understand the logic. The flow of the narrative could be more reader-friendly to avoid the impression of a heavy document... The referenced documents [I see they are back again in the next session] - but at this point I find them confusing... shortly explaining their scope can help the flow...
Sociedade Algodeira do Niassa, JFS - SA	As explain the difference between principles and criteria. For some farmers is difficult to understand.
Better Cotton Initiative	Question: Were the BCI PP&C first published in 2010, or 2009 as indicated in other internal documentation used for presentation purposes?
AFPRO ( Action For Food Production)	The BCI Principles and Criteria were originally published in 2010, and amended in 2013. The present version is a result of a comprehensive review and revision of the Principles and Criteria that commenced in February 2015. All the scenario are covered by BCI since the formation & Objectives are revised base on need. The new principle of Management will be well documented.
COTTONCONNECT	I think it's good to have a introduction of "History and objectives" section before the principles and criteria. But please make sure it's not too redundant



9 **Question 2 - p.10**

**Do you agree with Scope section content?**

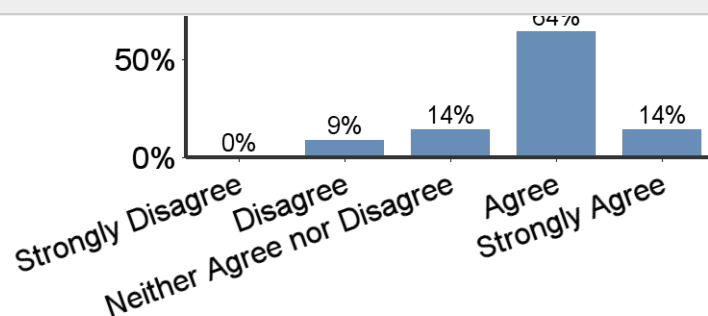
#	Answer	Bar	%
1	Yes	<div></div>	86.36%
2	No	<div></div>	4.55%
3	I don't have an opinion	<div></div>	9.09%
	Total		100.00%

**Please explain your answer**

Name of your organization	Comment
WWF	How to deal with losses of HCVA, illegal activities, lack of social conditions within the unit of production and bad water management within other crops? Conversion of HCVA, illegality, bad water management and minimum social conditions should not be allowed within the whole unit of production and the producer must show compliance to these. These points are key for WWF. BCI must set some minimum requirements, plus legality, for the whole unit of production minimum requirements For WWF at least no HCVA losses, good water management, compliance to the ILO core criteria and legality for the whole unit of production. See our comment related to the limitation of the BCI Principles only of the cotton production system. How to deal with losses of HCVA, bad water management, illegal activities, lack of social conditions within the same unit of production? Other crops will share common resources, such as water. This is very risky for BCI and allows greenwashing besides allowing audits loopholes
IDH The Sustainable Trade Initiative	" However, some of the Principles and Criteria apply beyond the boundary of the Production Unit." - This could be explained with an example "...unless they are covered by prescriptions in the management plan." - Could be rephrased? Unclear what the message is.
Freelance - Certified Better Cotton Trainer	Yes but again the referenced documents at this point hinders the flow of reading...
AFPRO ( Action For Food Production)	Cotton is a long term crop, nutrient balance depending on previously grown as well as inter crop or border crop, So count another season with cotton for long term stainability. Crop seasonal cycle also play major role for IPM practices.

**Question 3 - p.10**

**In the Draft, climate mitigation and adaptation requirements are represented by “themes” scattered in Soil and Water principles. Do you agree with this way of doing?**



**If you do not agree, how do you recommend to address “Climate mitigation and adaptation” aspects in the revised version of the standard?**

Name of your organization	Comment
IDH The Sustainable Trade Initiative	I agree with this because a broad theme like Climate mitigation/ adaptation would need to be driven by a thought leader (perhaps BCI) as most of our current implementing partners may be able to run an efficient extension training but do not have the perspective on climate de-risking. Effective measures could be crop mix planning, sowing patterns and timelines, weather forecast based planning, choosing seed varieties, even additional livelihood plans - however, not all of these come under the BCI mandate. Perhaps, if within our Production Principles, there are 'actions' or 'measures' that can be taken on these themes, these should be highlighted or suggested - and there should be a medium/long term visible benefit that can be demonstrated
Better Cotton Initiative	Climate mitigation and adoption in itself is a broad term, therefore addressing the factor (Soil water etc.) affecting, is a justified approach.
WWF	Besides Soil and Water principles, Biodiversity also matters a lot, when we discuss Climate mitigation and adaptation.
Freelance - Certified Better Cotton Trainer	I think it is definitely better to keep climate change mitigation and adaptation within the content of principles. Some steps to meet the criteria are anyway contributing to climate change mitigation and adaptation. The important aspect though is to ensure that field facilitators create an enabling learning environment to create awareness on how specific activities contribute to climate change mitigation and adaptation as well as awareness on climate change issues.
AFPRO (Action For Food Production)	Yes we agree with this way of doing. Focusing both soil and water from climate change aspect. But it can also be included in Crop protection because climate variation directly affects pest and disease infestation & crop production at the stage of harvest. The word 'Climate Mitigation' can be rewritten as 'Climate Smart' as Intent and indicators address both mitigation and adaptation to climate change
Abrapa	Cultivars, time of sowing, weather and other issues should be addressed.
Shandong Nongxi Cotton Cooperatives	As a farmer, I don't understand what is the linkage between climate mitigation and adaptation requirements.
Cotton Australia (myBMP)	However, climate change adaptation and mitigation does not require that dedicated criteria be added to the principles, rather the issue can be highlighted in guidance material: good agricultural practices are good agricultural practices and need to take into account all relevant circumstances including climate change / climate variability etc. A dedicated criteria as proposed will merely duplicate the

**Question 4 - p.11:**



**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

**The new proposed criteria 6.3 (page 9) is one example of option 1 where a criterion has been split into a higher number of more detailed and descriptive indicators.**

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

#	Answer	Bar	%
1	Option 1		59.09%
2	Option 2		40.91%
4	I don't have an opinion		0.00%
	Total		100.00%

Please explain your answer	
organization	Comments
BCI China Office	The option 1 provides a more clearer guidance on evaluate the performance of PU and LF from practical perspective, whether it is for self-assessment, 2PV and 3PV.
Sociedade Algodeira do Niassa, JFS - SA	Our farmer have low knowledge of cotton technician, also low level of cotton skills and low education. Some of our producers only understands the native language. So the more simples and easier comprehension better to our farmers.
Better Cotton Initiative	Whereas I have selected 'Option 1', I would also advocate for additional guidance on implementation wherever possible (may be difficult if differing local / regional / national conditions necessarily require varying approaches).
AFPRO ( Action For Food Production)	Option 1 is better to draw clear cut indicators which may be supported by guidance for implementation where ever required to give more explanation because general criteria may vary region wise. As in India School Children helping the parents in non hazardous field operations are amended from child labour criteria . Similar changes required for comply with BCI Standards for different regions base on their existing practice.
Abrapa	New indicators will create another crisis in Brazil. I strongly n[believe this report should be abolished after the third year of licensing.
Shandong Nongxi Cotton Cooperatives	Option 1 will be easier for Better Cotton Implementation & Monitoring and Evaluation
BCI	Given the global nature of the standard, and the wide array of contexts, I don't think being more prescriptive is advisable. I think stronger guidance on implementation is best, with discretion given to those verifying compliance, but also strong training and oversight of same.
IDH The Sustainable Trade Initiative	Option 1, but the list should be a checklist but rather an indicative list of indicators. Such principles are vastly subjective to local interpretations and this a combination of the listed indicators.
WWF	Guidance is the best tool to achieve the targets and also helpful in efficiently implementation.
Israel Cotton Board (ICB)	Modification and further requirements will require additional indicators
Better Cotton Initiative	Not only need to develop the additional indicators, more important is to develop very clear indicators to correctly implement and evaluate the criteria.
Freelance - Certified Better Cotton Trainer	Although I checked option two, both are necessary. In terms of implementation guidance examples are crucial! Explanation could include a case on how the criteria was met in the ground. e.g. Measuring the used water can be an issue in different regions where the necessary infrastructure is not available... If a PU managed to find a solution, this should be available to all PUs around the world to learn from - maybe a separate booklet on how criteria are met elsewhere..
Water Footprint Network	For some criteria the indicators are too vague (see our comments in Principles' sections). However guidance for implementations will always be crucial and should never be left out.
BCI	I would consider the 2 options together: begin slightly more prescriptive and in the mean time providing more support and guidance on how to implement the criteria. In general the wording of the indicators is completely unhomenegeous and often does not make sense as it has been taken from the PS. You need to turn it as verifiable indicators and not an open question on result.
COTTONCONNECT	Farmers always want to know what to do and how to do. More guidance on implementation and what is required will be easier for faremers to understand.
<a href="#">View More</a>	

**Question 5 - p.12:**

**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"?**

#	Answer	Bar	%
1	Strongly Disagree		4.55%
2	Disagree		18.18%
3	Neither Agree nor Disagree		13.64%
4	Agree		50.00%
5	Strongly Agree		13.64%
	Total		100.00%

**Please explain your answer**

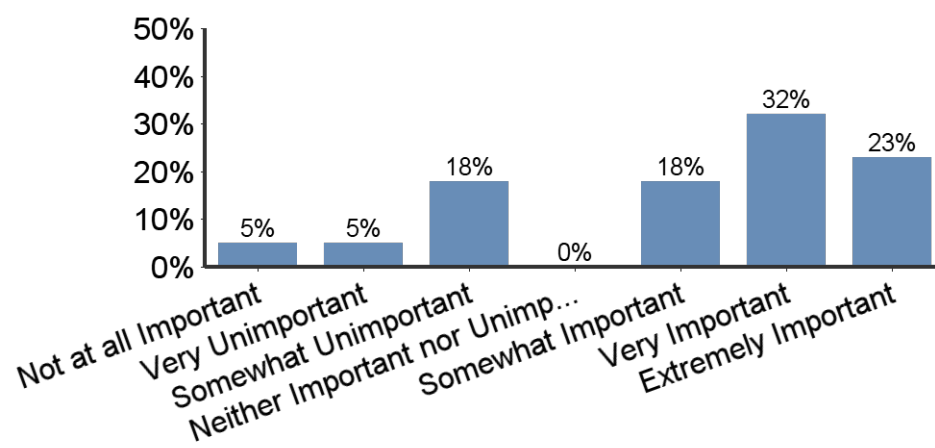
Name of your organization	Comment
BCI China Office	The philosophy of BCI system is continuous improvement. With a management system to be established as the 7th Principle, it is helpful for farmers to improve from implementation perspective. Plus, the management criteria has already been included in the minimum requirement, it will be more streamlined to include it as the 7th principle.
FFPSD/GIZ Tajikistan	A lot of the proposed indicators in 7th Principle has to do with PU management (only identical with farm management in the case of LFs). Although very important for success and credibility of BCI, this touches a different layer in my opinion and should be made clear (different title, not 7th, but other order/sequence).
Better Cotton Initiative	Having a sound Management System in place is the foundation for ensuring that all other production principles and criteria are being followed. In the absence of this being in place, it raises questions of credibility - especially in terms of being able to monitor and report (e.g. Results Indicators).
AFPRO (Action For Food Production)	We agree with the decision to group all the management criteria into new 7th principle. It should be expected to complete in three years scaling partially each year. All LG leader are responsible for implementing BCI system instead of Field Facilitator.
Abrapa	The simpler the better.
Shandong Nongxi Cotton Cooperatives	It will provide clearer direction on implementation as well.
IDH The Sustainable Trade Initiative	I believe the ownership of the management system lies with the project owner. In this case, most of the management system is run by the implementation partners - records of trainings, PUs, activity plans, results indicators, etc. The only management system by producers directly, is their farmer field book. (individual basis). I agree that is a good principle to introduce - but with onus on the project owner, not the producer.

Better Cotton Initiative	Implementation of 6 principles covers the management. If we require more management we address them inside the criteria.
Israel Cotton Board (ICB)	Management is critical to achieve performance and change.
WWF	Many of the Principles also deal with management as you need to manage the water, soil, etc and therefore you need specific management for different principles. We are ok to include a 7th principle on management, as long as it is kept the specific management requirements for the other principles.
Freelance - Certified Better Cotton Trainer	Since farmers operating a management system is crucial for their own development I absolutely agree upon an 7th principle for a management system.
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	Even-though introducing management criteria as the 7th criteria makes the standard system simpler not all the Producers (Farmers) will be able to run an internal management system. Only big farmers and Producer Units (with their PU manager capacity) can run a management system. Farmer should be responsible for the implementation of the PU management system but not running its own.
Water Footprint Network	We are not familiar with BCI implementation and monitoring. We are also not aware of producers' challenges with the implementation of Better Cotton Criteria. They are probably the best contributors to this aspect.
BCI	as long as we do not call them the "production" principles and criteria. I would in that case encourage the use of indicators both on the minimum and improvement requirement side
COTTONCONNECT	Principles mainly go for farmers, while management system go for IPs or PU managers. It will complicate the implementation of project if make the management criteria be the 7th principle.

## **PRINCIPLE 1: CROP PROTECTION**

**Question 1 - p.18 :**

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. How would you rate the need to develop a stricter and/or more sophisticated restriction approach, for example towards the elimination of Highly Hazardous Pesticides (HHP's)?



If relevant, how would you propose to make BCI's approach to pesticide restriction stricter and/or more sophisticated?

Name of your organization	Answer
BCI China Office	I would suggest that the elimination of the WHO 1a/b toxicity as the minimum requirement
FFPSD/GIZ Tajikistan	I don't think so. Given that national legislation is up to date, restriction to only use those registered and correctly labelled seems sufficient. More important it might be to keep a close eye on actual practices with black market products still available in some cases (2PCCs, 3PV).
Oregon Tilth	As many pesticides as possible should be restricted from use, including HHP's. If there are chemicals on the WHO list that are currently used on the cotton crop, they need to be identified by the grower for the verifier and a time line in place to phase out their use. There is a need for clear guidelines around the Continuous Improvement Template and how the Country manager will check in with growers to chart improvement between licensing years.
AFPRO (Action For Food Production)	Yes, More Sophisticated restriction approach need to be developed for elimination of Highly Hazardous Pesticides. More focus required for clear identification of bio product. Scientist are recommending WHO class 1a/b pesticides in their lecture and hand out. So work with central body of government. Strict action required on this aspects. The alternatives of banned pesticides should be explored before implementing sophisticated restriction.

16	Do not use the word "Reduce". Brazil has a lot of problems being short in molecules, ancient legislation, torpical weather, high pressure of pests, deseases and weed infestation. Reduce is very trick here.
Abrapa	
Shandong Nongxi Cotton Cooperatives	No comments. Chinese legislation on pesticides is already quite strict.
Cotton Australia (myBMP)	Note the addition of Annexes of the Montreal Protocol. While the need for coherence is noted, it also needs to be relevant, and not simply included for the sake of 'completeness' In regards to the use of methyl bromide: Since 1 January 2005, all uses of methyl bromide, other than for certified Quarantine and Pre-Shipment, approved feedstock applications, or approved under critical use exemptions, have been prohibited in Australia under the Ozone Protection and Synthetic Greenhouse Gas Management Act 1989 (the Act)
BCI	No opinion. This isn't relevant to the US context, as none of the WHO 1a/b or Rotterdam materials are registered here.
IDH The Sustainable Trade Initiative	However, this also needs some research into available substitutes that are equally effective but less hazardous. Furthermore, it requires some advocacy level work on the policy level nationally or provincially.
AbTF	No need to develop a stricter restriction approach referring to Highly Hazardous Pesticides, but rather need to be stricter on those pesticides already in the scope. Why not ban pesticides in Rotterdam and WHO 1a and 1b directly instead of undefined phasing-out period?
WWF	Indicator 1.1.1: Add "and the plan is revised annually on the basis of pest monitoring during the year by the producer unit". Management of resistance: Management of Resistance against GM varieties and against pesticides groups and the plan is revised annually on the basis of pest monitoring during the year by the producer unit. WWF strongly asks to ban from 2016 on at least all pesticides listed in the Rotterdam convention (besides Stockholm), and for a clear time bound plan to reduce and to phase out WHO 1a/b for large, middle and small holders. The phasing out of WHO 1a/b should start as an improvement requirement but it should contain tangible targets and a clear ban date. Suggestion for a ban date of WHO 1a/b is 2020. For WHO 2, WWF recommends an improvement plan to reduce their use, including tangible targets for reducing and possibly eliminating these by 2023. Banning products listed on Rotterdam and Stockholm conventions plus a tangible phasing out of WHO class I has been the minimum level for sustainability standards.
Israel Cotton Board (ICB)	There might be a need, however: The standard has to be realistic and to enable solutions for growers. Being stricter and eliminating pesticides may become unbalanced and leave growers without solutions. I would stick with international conventions and national programs that are more balanced from a producer standpoint.
SGS-CSTC Standards Technical Services Co., Ltd.	Proposal for compliance criteria: Prevention threshold of pest populations and of the spread of disease shall be listed for farmers. We agree: Review criteria 1.1 in the PS so that either: - Apply prohibition of calendar or random spraying as a minimum compliance criteria to MF and LF or harmonize - Clarify meaning of "IPM programme" and "adapted and time bound plan Proposal for compliance criteria: The spray shall be implemented in accordance with phenophase, field observation and prevention threshold. Calendar and random spraying shall be prohibited. Proposal: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100%
Better Cotton Initiative	Restriction should be to the chemicals banned or phasing out as per national legislations
Freelance - Certified Better Cotton Trainer	Yes as it it will contribute to limit the accessible pesticides to be used and support understanding better each remaining pesticides on the market and their differences! As well as providing an opportunity to clearly explain why these restrictions exist!
Better Cotton Initiative	The PU;s and their teams need to understand the serious issues that are being faced by farmers by using WHO 1a/1b a phase out plan based on its usage has to be made out. The modes of actions of different pesticides need to be understood as well
BCI	the phase out should be at least timebound. Also in favour to be stricter on the class of pesticides we do not authorize by including Rotterdam and who 1a. Same as cmia. that will not impact partners too much. Question mark on toxic load ranking, shall we start introducing a notion of "using the less toxic active ingredient available (as recommended by ??) when a decision has been made/ informed decision by the Producer or the partner? indicators need to be rework, the 1.1.4 does not make any sense for example
Water	Yes, we believe there is a need for further development by providing guidance on the less toxic of pesticides per pest and region. We have undertaken studies that showed that a pesticide that is not only allowed to be used in India, as it is the pesticide recommended by the Indian Ministry of Agriculture to prevent certain cotton pests, is highly toxic to fresh water environment. We believe th-

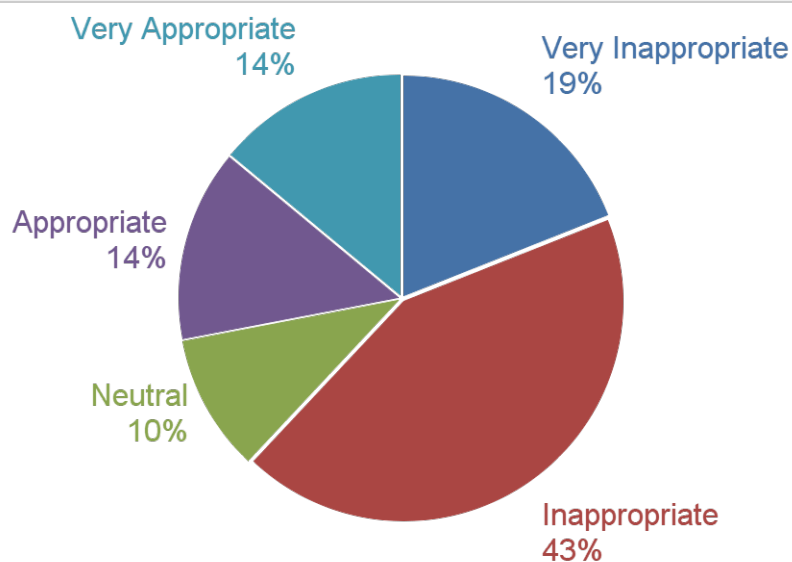




Better Cotton Initiative	The PUs and their teams need to understand the serious issues that are being faced by farmers by using WHO 1a/1b a phase out plan based on its usage has to be made out. The modes of actions of different pesticides need to be understood as well
BCI	the phase out should be at least timebound. Also in favour to be stricter on the class of pesticides we do not authorize by including Rotterdam and who 1a. Same as cmia. that will not impact partners too much. Question mark on toxic load ranking, shall we start introducing a notion of "using the less toxic active ingredient available (as recommended by ??) when a decision has been made/ informed decision by the Producer or the partner? indicators need to be rework, the 1.1.4 does not make any sense for example
Water Footprint Network	Yes, we believe there is a need for further development by providing guidance on the less toxic of pesticides per pest and region. We have undertaken studies that showed that a pesticide that is not only allowed to be used in India, as it is the pesticide recommended by the Indian Ministry of Agriculture to prevent certain cotton pests, is highly toxic to fresh water environment. We believe the best way forward, would be to 1- identify, for each region and each type of disease, the less toxic pesticides and provide the list as the preferred pesticides to be applied 2- identify, amongst the most commonly used pesticides in each region, which are the most toxic ones and provide a list of recommended pesticides. Doing this, may not apply t
Pesticide Action Network UK	BCI should extend the list of prohibited materials to include those listed in the Rotterdam Convention, and those classified as highly/extremely hazardous (WHO/1a/b). This would bring it into line with other cotton standards such as CmiA, and Fairtrade. In particular, the inclusion of PIC pesticides is very important/relevant because the pesticides have been shown to have serious health or environmental impacts in "real life" scenarios and pose a serious threat to farmers. Targetting these pesticides not only benefits farmer health and the environment, but also prepares them for future legal developments. hazardous pesticides are increasingly subject to legal restrictions - PIC listing for example, often triggers restriction at a national level - so supporting farmers to do without these chemicals means they are well prepared for likely future tightening of legal standards. In the longer term BCI should adopt a prohibited list based on the FAO/WHO HHP criteria. IPs should be encouraged to make use of the draft Toxic Load Indicator to help individual PUs identify relevant toxicity/harm issues in their uses and set their own priorities for action on HHPs which are not possible to phase out in short term.

**Question 2 - p.20:**

In relation to "No distinction is made between synthetic or natural substances that are applied for any of these purposes" (Guidance for implementation - page 7) . Is it appropriate that any natural substances used as a pesticide (e.g. a pest repellent natural substances) be "registered for use and properly labelled"?


**Question 3 (part1) - p.27**

Is there a need for more guidance about what constitutes "appropriate" PPE, and/or what constitute "correct use"?



#	Answer	Bar	%
1	Yes	<div style="width: 84%;"></div>	84%
2	No	<div style="width: 16%;"></div>	16%
	Total		100%

**Please explain your answer**

Name of your organization	Comments
BCI China Office	This is one of the examples that farmers confuse and also difficult for 2PV and 3PV to judge. I would suggest we give more specific information on appropriate PPE and minimum requirements on PPE
Oregon Tilth	Appropriate PPE will depend on the chemical being sprayed and how it is applied. It is enough to instruct growers that all instructions for application be followed on the the chemical label. The minimum PPE needed will be stated there and constitutes the appropriate amount.
Sociedade Algodoeira do Niassa, JFS - SA	We can give some examples of what is PPE . We teaches our farmers and help them to use the PPE or in other case how to made this own PPE , as use large clothes and made a homemade cover to the mouse .But we need to adjust the PPE at local condition . Our farmers don't have money to buy PPE and some time is difficult to find a shop to buy . So special attention of define PPE to local condition.
Better Cotton Initiative	Specific reference to checking PPE requirements as per the labels of chemicals seems appropriate.
AFPRO ( Action For Food Production)	Yes , More Guidance on appropriate & locally adoptable PPE required
Abrapa	Not here.
Shandong Nongxi Cotton Cooperatives	Smallholders farmers usually don't take the PPE seriously unless you tell what they should do.
BCI	In general, yes, more guidance is good. Also, the presence or availability does not mean it is used.
IDH The Sustainable Trade Initiative	yes it is beneficial, as indicative - this also helps the PUs understand and plan for the criteria effectively. It will also require local interpretations
Better Cotton Initiative	Appropriate PPE need to explained more. Relaxation at local level also need to be explained if accepted and allowed. I suggest Appropriate Standard PPE as IR and minimum PPE as MR.
Freelance - Certified Better Cotton Trainer	More guidance on "appropriate" PPE is needed and differentiation between "appropriate" and "basic or minimum" PPE should include the explanation of the risks involved in the use of both options
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	There is a need for more guidance about "appropriate" and "correct use". BCI can use "basic or minimum" instead of appropriate. There should be a description of what is basic or minimum with some examples in the guidance.
Better Cotton Initiative	its clear the only thing that needs to be taken into consideration is the general environment of the country or region where the PU is operating.
BCI	on question 2: no not to me, this statement sounds to me that we prevent Producers from using biopesticides if those once are not registered. Many techniques used by BCI farmers are hand-home made and needs to be encouraged. I would rather make a distinction here in btw synthetic and natural question 3> yes for smallholders it would be good to judge what is acceptable or not. I would not necessarily move it to a minimum criteria as suggested in the revision feasibility will be an issue if proper guidance is not developed in order to assess what acceptable local PPE can be.
Pesticide Action Network UK	substandard PPE is often used. this reduces the level of protection. it is essential that growers have access to high quality protection appropriate to the type of pesticides they are using and the delivery methods adopted. Fairtrade has been experimenting with disposable PPE which offer some protection. It would be worthwhile working with them through ISEAL to explore what they are doing. Another thing to consider is expanding the guidance to cover the washing of PPE as this can be a significant route of exposure.

**Question 3 (part 2) - p.27**

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)?

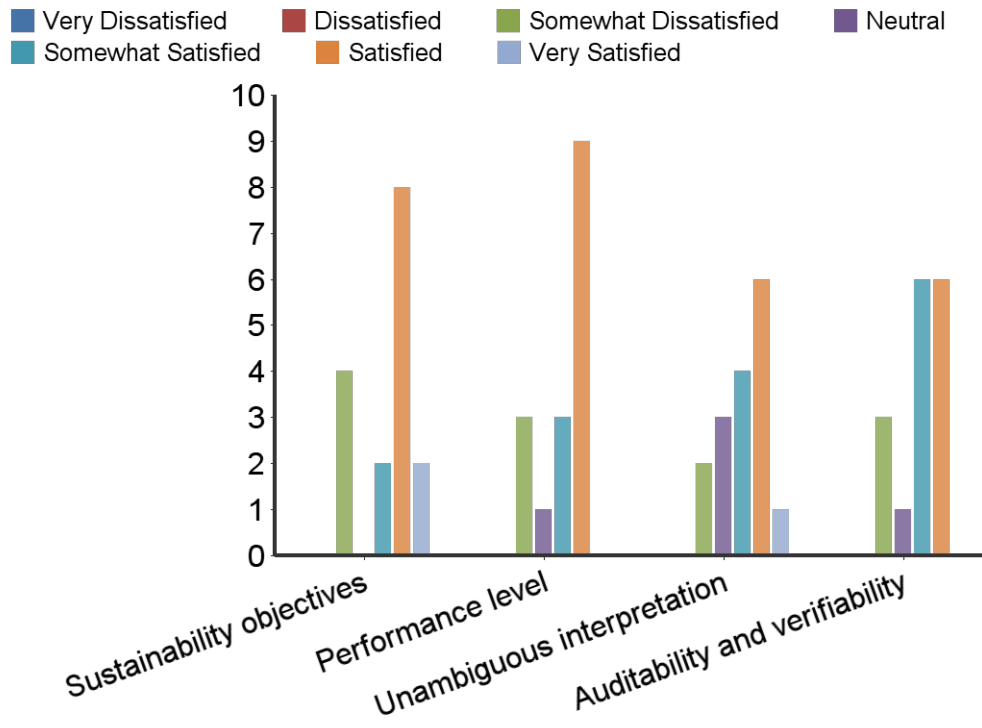
#	Answer	Bar	%
1	Yes		58%
2	No		42%
	Total		100%

Name of your

**If yes, how could BCI define “basic or minimum” PPE?**

BCI China Office	mask, scraf, glove, etc.
FFPSD/GIZ Tajikistan	Actually, some explanation is given in "Intent" and could be transferred to guidance section. I do not see any on "basic or minimum", only "appropriate" above, but do think that "basic or minimum" is the better fitting terminology.
Better Cotton Initiative	I would expect 'appropriate' and 'minimum' to be the same thing in this case.
Shandong Nongxi Cotton Cooperatives	As I understand, mask, hats, gloves, boots are the minimum PPE
Cotton Australia (myBMP)	No. There is plenty of material available to provide guidance in Australia. Cotton Australia also receives good support from the Australian Centre for Agricultural Health and Safety. myBMP provides useful on-line resources for cotton growers to help with PPE. Accredited training is also a requirement for myBMP, and this includes PPE.
IDH The Sustainable Trade Initiative	No, but could give more guidance on why the PPE and the risks of not using, during performing the key activities relate dto storage, disposal and handling. The health repercussions need to be highlighted. - in man days saved, treatment costs saved, ill health avoidance etc
AbTF	Yes, need for more guidance about what constitutes „appropriate“ PPE. It is also not clear (from the formulation of the question) what your requirement is. The question suggests that „basic/minimum PPE“ are required, while Criterion 1.6 uses „appropriate PPE“.
Better Cotton Initiative	Appropriate PPE may be standard approved list of PPE (applicable as MT). Minimum PPE should be minimum safety precautions to be take to replace an appropriate PPE. e.g. a standard mask may be an appropriate PPE and 'covering face/mouth during preparation and application of pesticides', may be a minimum PPE requirement.
SGS-CSTC Standards Technical Services Co., Ltd.	follow the requirement showed in the label of plant protection products
Israel Cotton Board (ICB)	No. This is clear enough.
WWF	In our view appropriate and minimum should be the same. BCI can change the wording to basic or minimum but in any case (be it appropriate, basic or minimum) it should at least contain: gloves, trousers, long shirts, shoes, mask, and eye protection. Still there is a need for interpretation in local context. For places where there is legislation, legislation should be the basis.
Better Cotton Initiative	in India for instance farmers are not willing to spend on PPE and generally make do with alternatives. Again the culture in which the PU is operating needs to be taken into consideration.
BCI	basic: minimum level of accpetability : face hand and feet
COTTONCONNECT	"basic or minimum" PPE means wear long sleeve clothes and mask. make sure no naked skin exposed to pesticides.

Generally, how satisfied are you with the suggested version of Principle 1?



### Do you have any other general or specific comment or suggestion to make on principle 1?

organization	Comment
BCI China Office	We have the concern here in China for Criteria 1.2: The Producer may only use pesticides that are: (i) Registered nationally for the crop being treated; For application of pesticide, it seems a normal practice for the farmers to use pesticide (Aweijunsu (active ingredient: Avermectins) and Miemianling (active ingredient: Emamectin-benzonate) registered for vegetables and fruits. In reality, the registration of pesticide in China requests the payment for different categories of agricultural products, for the cost of the trial which will last for two years normally. The more products that a company would like to register, the more it has to pay and the longer it has to wait for the approval. Hence, some companies only registered the pesticide for one or two agricultural products so as to reduce the time and money for commercialization of the pesticides. Even for pesticides with same ingredients but different brand names, sometimes you may find one can be used for cotton while the other one is applied for vegetable. I will attach a memo fyi.
FFPSD/GIZ Tajikistan	Burn and bury method only second best, rinsing containers and then puncturing before disposal recommended as best practise. -> consider to include in guidance section.
Oregon Tilth	The need to organize recycling facilities in farming communities of Arkansas and other cotton growing counties in the eastern US is great. Without access to recycling options, eastern Arkansas farmers are triple-rinsing pesticide containers and then burning them. BCI could encourage existing recycling facilities in nearby counties to expand their territory and build services in under served areas. Depending on the composition of the plastic being burned, farmers could be releasing dioxins and PCBs in the environment, as well as risking their own health. In other states the recycling of pesticide containers is regulated and farmers must participate in the programs.
AFPRO (Action For Food Production)	Question2: Regarding the Bio tot other pesticide formulation available in market registration is compulsory . But for home preparation like Neem Seed Kernal Extract , 10 leaf extract etc proper labelling and registration is quite difficult. As it does not harm the crop and environment, so registration can be avoided. General comment: The initiative can be taken up by the Implementing partners and raise representative/volunteer farmers which can be encourage to adopt such activity and create awareness among other farmer for the safe disposal of containers. For Integrated pest management ; Irrigation at critical stages and availability of quality seed is very important so it should also be considered under criteria 1.1
Shandong Nongxi Cotton Cooperatives	For principle 1 criteria 1.3 Proposal for production and compliance criteria revision: 1.3 Minimum Requirement: Registered nationally for pests being treated as Minimum Requirement. Improvement Requirement Registered nationally for the crop being treated as Improvement Requirement.
Cotton Australia (myBMP)	Quesion 2: In principle yes, natural is not the same as safe or non-toxic. 'Registration' of home-made natural pesticides would of course be problematic, but the labelled criteria would be important to retain, as this is feasible and appropriate good practice for both human health and quality control.
BCI	California has legislation that requires farms to store clean, used jugs and then take them to established recycling facilities. In the US--outside California--recycling programs for containers are often weak or nonexistent. Thus, farmers store used containers (safely and separately, usually) then burn them. This is obviously not desirable, as it releases noxious gases. A few even bury them. For pesticides used in significant quantities, there is a trend toward "totes", large, 500 gallon plastic containers protected with wire mesh that are delivered to the farm by the supplier, then collected by the supplier when empty for re-use. Totes have the additional advantage of being connected directly to mixing apparatus, creating a closed system in which users are never exposed to the material itself. For pesticides used in smaller quantities, and/or not available in totes, jugs are still used. Ideally, I'd like to see us encourage gins and coops (esp. those with an active role in our group assurance model) take responsibility for creating a recycling system for these. RE non-synthetic pesticides, it's important to bear in mind that, just because they are not synthetic, doesn't mean they are risk-free. IF, however, there are non-commercial (and thus unregistered) materials that experts agree and recommend, it's very challenging to account for the risks inherent in their use, if they aren't registered. Are there such instances? I don't know.

23	<p>Question 2: This could be a discrimination of traditional local knowledge, if the Farmer uses natural substances he should provide the verification about the application of the substance and the harmlessness to environment, water and humans. Criteria 1.3: WWF strongly asks to ban from 2016 on at least all pesticides listed in the Rotterdam convention (besides Stockholm), and for a clear time bound plan to reduce and to phase out WHO 1a/b for large, middle and small holders. The phasing out of WHO 1a/b should start as an improvement requirement but it should contain tangible targets and a clear ban date. Suggestion for a ban date of WHO 1a/b is 2020. For WHO 2, WWF recommends an improvement plan to reduce their use, including tangible targets for reducing and possibly eliminating these by 2023. Banning products listed on Rotterdam and Stockholm conventions plus a tangible phasing out of WHO class I has been the minimum level for sustainability standards. 1.3.1 i: WWF strongly asks to ban from 2016 on at least all pesticides listed in the Rotterdam convention (besides Stockholm), and for a clear time bound plan to reduce and to phase out WHO 1a/b for large, middle and small holders. The phasing out of WHO 1a/b should start as an improvement requirement but it should contain tangible targets and a clear ban date. Suggestion for a ban date of WHO 1a/b is 2020. For WHO 2, WWF recommends an improvement plan to reduce their use, including tangible targets for reducing and possibly eliminating these by 2023. Banning products listed on Rotterdam and Stockholm conventions plus a tangible phasing out of WHO class I has been the minimum level for sustainability standards. Criteria 1.4 : A clear time bound plan to reduce and to phase out WHO 1a/b for large, middle and small holders. The phasing out of WHO 1a/b should start as an improvement requirement but it should contain tangible targets and a clear ban date. Suggestion for a ban date of WHO 1a/b is 2020. Indicator: 1.4.1: The indicator should include the targets for reduction and under which circumstances the targets were not reached (i.e. due to a severe pest, etc). Indicator 1.8.4: [...] workers AND NEIGHBORHOOD GENERAL COMMENT: 1)It needs to be developed a guidance on what means safely disposal, specifically for when there are no collection and recycling available. 2) Also what is the provision for crop pesticide use in tandem with irrigation scheduling? There is a specification for the time period relative to rain, but not to irrigation application or type of irrigation which could affect levels of runoff or groundwater contamination. Also alluded to under the water management section but doesn't seem to be explicit. 3) Is there any recommendation for on-farm practices (e.g. runoff management structures, ditches, etc.) to mitigate the effects of pesticides on water sources? Or aim to understand if this should be a focus in relatively high risk regions e.g. if there is a lot of soil water entering groundwater, whether local populations are at risk due to dependence on nearby groundwater sources etc. Again, implicit but not explicit part of water management plan</p>
WWF	<p>Question 2: All materials should abide to the same criteria. FYI some "natural substances" (and even those approved for organic production) are highly toxic and environmentally unfriendly.</p> <p>1.2 &amp; 1.3 Proposal for production and compliance criteria revision: 1.3 Minimum Requirement: Registered nationally for pests being treated as Minimum Requirement. Improvement Requirement Registered nationally for the crop being treated as Improvement Requirement. Include WHO, Rotterdam and Montreal conventions to 1.3 ; Proposal to be added to the proposed revision by BCI to 1.3 but exclude the pesticides that are in the exemption period according to national legislation.</p> <p>1.6 Proposal: The multichoices could be: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Proposal: The multichoices could be: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Estimated number of farms where pesticides are prepared and applied by persons who correctly use appropriate protective and safety equipment in accordance with the label on the pesticides container. ( ) none ( ) a few ( ) some ( ) most ( ) all Proposal to add one more question to P2 Have all staff who work with pesticides received training on safe work procedures and the maintenance, use and proper storage of PPE in accordance with the label on the pesticides container? ( ) Yes ( ) No 1.7 Proposal on P5. Estimated number of farms with separate and safe storage&amp;cleaning sites available, far away from the water resources,dainage/pipes and human/livestock drinkin water area ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Proposal on P4: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Proposal: Suggest to learn the criteria of storage of pesticides appplication equipment and containers from Sustainable Agriculture Network(SAN) As inspection and cleaning of pesticides application equipement is not happened at the same time, it is suggested to separete the original one question into two questions as follows, — Ensures that all rinsate and run-off is far away from water resouces/drainage/pipes and poses no contamination risk? ( ) Yes ( ) No Is application equipment inspected and cleaned: ( ) At the start of each spray season ( ) At least once every month ( ) Before every use 1.8 Proposal on P6: The multichoices could be: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% 1.9 Question for discussion with HQ: The situation in China is that there is no viable recycling program available. The LF or PU either bury or burn the containers. In addition, no legislation in China indicates the requirements on safe recycling at present. We would like to know how to define the word "safe" in this kind of situation. Proposed revision to P5: Are all pesticide containers(spray tank) rinsed or disposed of safely? rationale: It is not practical for record the triple-</p>
Israel Cotton Board (ICB)	
SGS-CSTC Standards Technical Services Co., Ltd.	






24	<p>1.2 &amp; 1.3 Proposal for production and compliance criteria revision: 1.3 Minimum Requirement: Registered nationally for pests being treated as Minimum Requirement. Improvement Requirement Registered nationally for the crop being treated as Improvement Requirement. Include WHO, Rotterdam and Montreal conventions to 1.3 ; Proposal to be added to the proposed revision by BCI to 1.3 but exclude the pesticides that are in the exemption period according to national legislation. 1.6 Proposal: The multichoices could be: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Proposal: The multichoices could be: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Estimated number of farms where pesticides are prepared and applied by persons who correctly use appropriate protective and safety equipment in accordance with the label on the pesticides container. ( ) none ( ) a few ( ) some ( ) most ( ) all Proposal to add one more question to P2 Have all staff who work with pesticides received training on safe work procedures and the maintenance, use and proper storage of PPE in accordance with the label on the pesticides container? ( ) Yes ( ) No 1.7 Proposal on P5. Estimated number of farms with separate and safe storage&amp;cleaning sites available, far away from the water resources,dainage/pipes and human/livestock drinkin water area ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Proposal on P4: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Proposal: Suggest to learn the criteria of storage of pesticides appplication equipment and containers from Sustainable Agriculture Network(SAN) As inspection and cleaning of pesticides application equipement is not happened at the same time, it is suggested to seperate the original one question into two questions as follows, — Ensures that all rinsate and run-off is far away from water resouces/drainage/pipes and poses no contamination risk? ( ) Yes ( ) No Is application equipment inspected and cleaned: ( ) At the start of each spray season ( ) At least once every month ( ) Before every use 1.8 Proposal on P6: The multichoices could be: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% 1.9 Question for discussion with HQ: The situation in China is that there is no viable recycling program available. The LF or PU either bury or burn the containers. In addition, no legislation in China indicates the requirements on safe recycling at present. We would like to know how to define the word "safe" in this kind of situation. Proposed revision to P5: Are all pesticide containers(spray tank) rinsed or disposed of safely? rationale: It is not practical for record the triple-rinse in the farm</p>
Better Cotton Initiative	<p>For 1.1, there are 5 condition to be implemented to reach to a compliance level what if partial implementation is there. People confuse over healthy crop. Hear healthy mean free from disease or good health/more immune to pest and disease. What are standard to rate, crop is health or not? 1.1 has ambiguity.</p>
Freelance - Certified Better Cotton Trainer	<p>The indicators might need to be elaborated further to ensure common understanding of each of them. For someone concerned and familiar with sustainability issues the linkages of the indicators with the requirements can be easily understood however, one needs to realize that this process is new to most farmers, to avoid a confusion on the definition it would be good to explain what is meant by each indicator. e.g. an agro-ecosystem analysis might not be understood by any regular agricultural engineer as well as a conventional farmer. Growing a healthy crop might have a different meaning to different farmers. A special attention is also required for what means resistance management and why it is necessary! Although there are no clarification in the indicators Indicator 1.1.3: Although I am familiar with the indicator - it took me a while to grasp its meaning - of course no calendar for spraying because of the IPM - This is where change will occur at field level and people will more likely resist to it - explanation is crucial to help create linkages of each different indicators or implementation guidance...The indicator can seem obvious but it is not... Indicator 1.1.5: I am not sure it is clear on what this means for implementation... Criteria 1.2: Based on the feedback from PUs pest resistance requires more explanation Indicator 1.6.1: Shouldn't it be done by all farms? Indicator 1.6.2: ..(at least every spray season).. is this remark necessary? The habit of checking each pesticide label should be present at any time their use is required or when purchased to ensure the availability of the appropriate PPE... As for the natural substances used as pesticides registration or labeling is not critical however creating a pool of natural substances used in different regions of the world (or within the same country) can be beneficial to share. This would also help to define whether any of these substances can be harmful...</p>
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton	<p>Criteria 1.1: Growing of a healthy crop may not be clear for everyone, it needs more explanations Indicator 1.1.1: only having a plan is sufficient to grant a license and license can be granted even if there isn't any single farmer implements. For the following year, what is the level of implementation that is required? It should be clear in the assurance system Indicator 1.1.2: This should be MR for SH also Criteria 1.2: The pesticides that are used may be correctly labeled but farmer may not be using them as it is described in the label (especially in terms of amount-dosage and timing). An addition can be made: (iii) Correctly used as it is mentioned in the label Indicator 1.2.2: The pesticide that are used may be correctly labeled but farmer may not be using it as it is described in the label. An addition can be made: 1.2.3 All pesticides are correctly used as it is mentioned in the label Criteria 1.4: Is t enough to have a plan? What will happen if they have a plan but they don't implement it as in the plan? Indicator 1.6.1: If it is a main requirement it is asking the estimated number of</p>



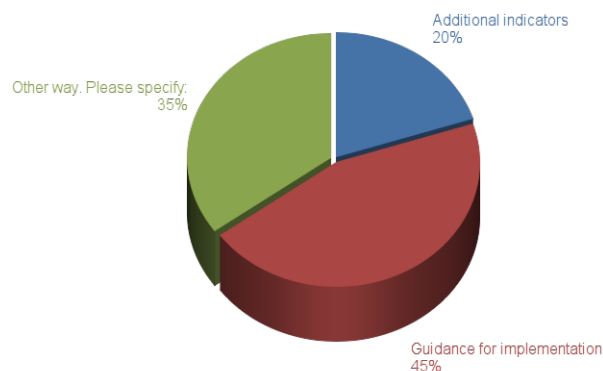
## **PRINCIPLE 2: WATER EFFICIENCY**

**Question 1 - p.38:**

**Should good management practices resulting from water management plan be explicitly worded out?**

1	Yes		75%
2	No		8%
3	I don't have an opinion		17%
	Total		100%

**If worded out, should good management practices be in additional indicators or through guidance for implementation?**



**Other way. Please specify:**

Good management practices should be explicitly worded out, at least in guidance.

We think a good guidance should be sufficient for criteria 2.2.2 - 2.2.4 as long as these are minimum criteria for LF and for MF.

See WFN's specific document about the Water Management plan sent along with this document




Both are actually needed... An indicator showing the farm taking into consideration other users could be beneficial as this will require them to identify potential other users including other species affected [as such can also help creating links with Biodiversity Enhancement Principle]

Both. Good water management practices should be explicitly detailed in additional indicators and in guidance for implementation.

No additional indicators.

**Question 2 - p.38:**

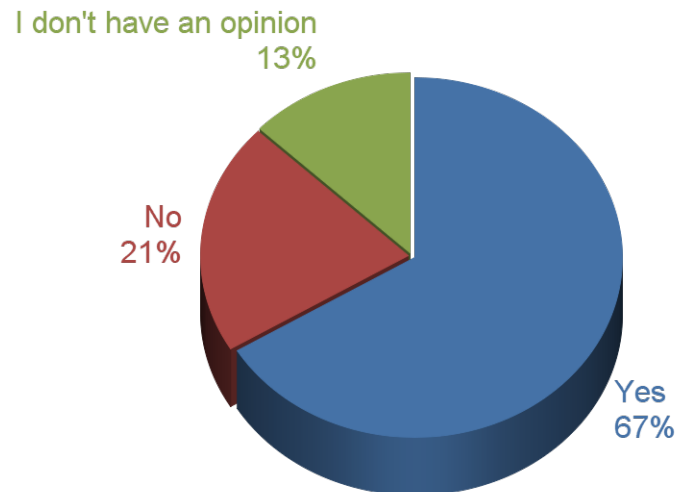
**In your opinion, does indicators 2.2.3 requirement for Large farm on monitoring needs further description and/or guidance?**

#	Answer	Bar	%
1	Yes		43%
2	No		39%
3	I don't have an opinion		17%
	Total		100%

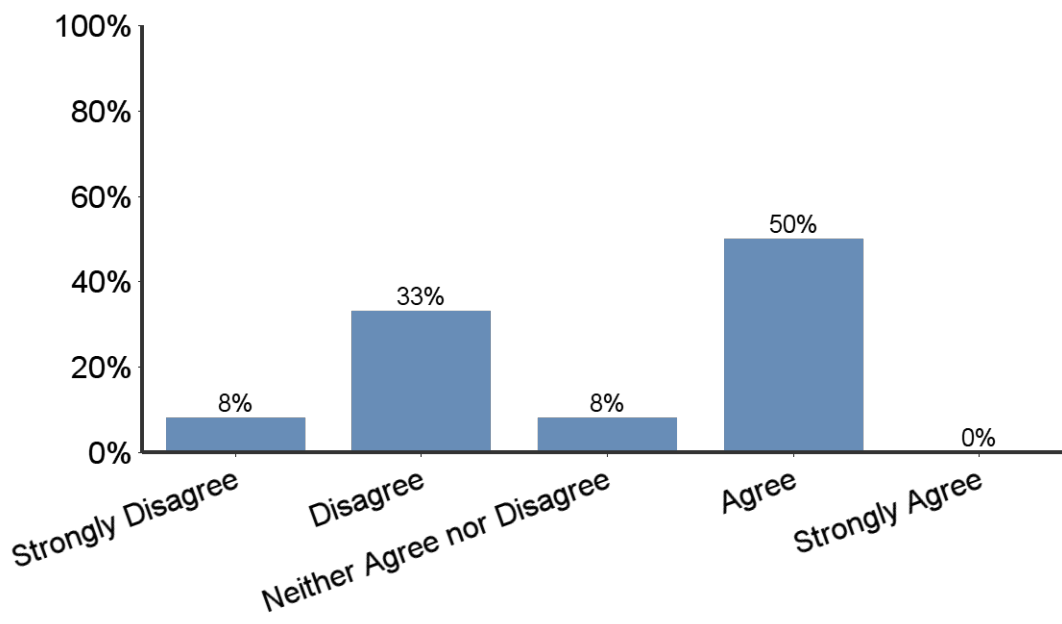
Name of your	
Please explain your answer	
Finance for Water Stewardship	on their water use, plan, implement and evaluate water use. This goes beyond ground water abstraction. This needs to apply to Medium and Small farms too if they need to get AWS certified. Clearly Group Certification could be very helpful for these producers.
BCI China Office	At least I would suggest to add the frequency to record the ground water level such as twice a year and keep the record of ground water level.
Oregon Tilth	There will not be compliance of this indicator without a state regulation in the United States. Farmers are not monitoring groundwater usage in Arkansas or Texas. In California, they will begin monitoring under the new Groundwater Management Plan, signed into law in 2014
FFPSD/GIZ Tajikistan	Documentation should and can be based on above mentioned material (e.g.: groundwater table) plus own documentation on pumped volumes with date.
Abrapa Shandong	Clear short guidance is always welcome.
Nongxi Cotton Cooperatives	Yes, I think so. It should be in more details such as what needs to be recorded(the depth of the water, the PH value of the water, etc.) otherwise, farmer will have no clue.
BCI Cotton Australia (myBMP) AbTF	It seems clear enough. It's either recorded or it's not, and multi-year data is either monitored, or not.
Better Cotton Initiative	Extraction of ground water is regulated in Australia and must be metered and recorded.  And the indicators should be Minimum Requirement!
SGS-CSTC Standards Technical Services Co., Ltd.	Requirement is clear, my question is what is the use of " ... recorded and trends monitored", The criteria indicates that if "groundwater sources is recorded and trends monitored" it is a compliance to the criteria.
Israel Cotton Board (ICB)	It's enough at present.
WWF	Yes, further guidance required. In Israel's case for example extraction of water from groundwater is monitored by a third party. Trends are definitely followed at the national/regional authority level and not by the LF. This needs to be worked out further.
Freelance - Certified Better Cotton Trainer	This should be a minimum requirement and guidance would be necessary for implementation and auditing. Guidance regarding monitoring and gauging the groundwater extraction and also detailed methodology of scaling the groundwater are important.  Yes especially for farms doing wild irrigation... The implementation guidance should provide options on how to measure used water where wild irrigation is practiced. Monitoring water extraction over the years is crucial for all scale farmers! As such it will highly contribute to the awareness on the importance of carefully using water resources. But also to perform as water steward in their own

**Question 3 - p.38:**

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

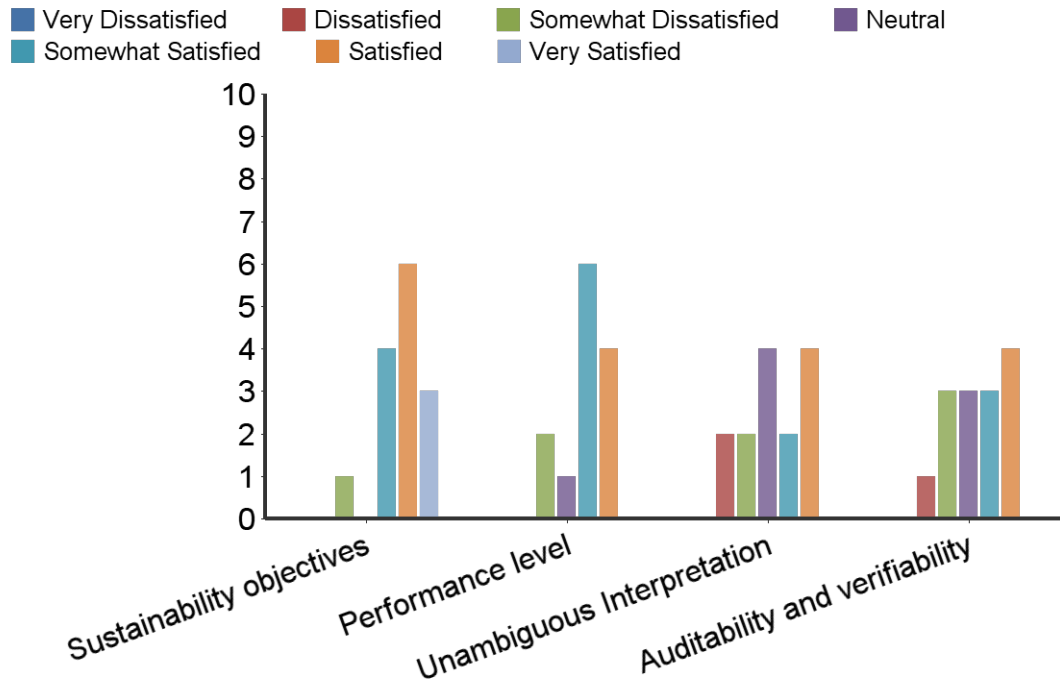
**Question 4 - p.40:**

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



29 Name of your	Comment
<b>Please explain your answer</b>	
Stewardship	
BCI China Office	First of all, the description of Criteria 2.3 is very difficult for farmers, even other stakeholder to understand. There are several terminologies need to be explained first, such as climate change and water management. Second, there should be the further explanation on why climate change is linked with water management.
FFPSD/GIZ Tajikistan	2.3.4 is taking it way to far in my opinion. For example, depending on local situation, it may suggest to not do anything in areas where badly maintained drainage caused water logging and raised water tables, which resulted in habitats ideal for frogs and the like.
Sociedade Algodeira do Niassa, JFS - SA	I don't like Must but " Try " . Somewhere is difficult to our farmer to understand what is climate change and try t adaptation . Almost our cotton is rain season so water management is not often applicable here.
Oregon Tilth	Specific water management practices that encompass the use of rain water collection and storage, reuse of irrigation water from tail ditches, conversion to drip irrigation for cotton and timing of crop irrigation are all part of the survival plan for large US farms in drought stricken regions.
Better Cotton Initiative	Note: 2.3.4 Technologies that conserve water and livestock species are implemented (What is meant by 'Conserve livestock species'?)
Abrapa	Is there a proved climate change? How is it shown and measured in Brazil? How are we going to address it regarding our large farmers? This is polemical. As a start we should raise awareness. This theme is still very controversial here.
Shandong Nongxi Cotton Cooperatives	As a farmer, I don't clearly understand the linkage between the two.
Cotton Australia (myBMP)	See note below (lack of space here for full answer); also, while strongly disagree for the need for this new criteria, as previously noted distinction between adopt and implement not clear
BCI	A farmer experiences changes in water availability in short time scales, and will adapt accordingly. Asking a farmer to understand/predict longer-term trends and develop a plan for adaptation may be asking too much. The principle is a good one; I just don't see a practical way to implement it in the standard.
IDH The Sustainable Trade Initiative	But, with this, can we say the Production Principles address climate change for small holders especially rainfed farms? With this, the cotton farmer is not entirely climate resilient - since we are only addressing one component - water. We are not engaging with the farm beyond the cotton season, nor addressing a suitable crop mix, varieties etc. We need to just be very clear about the premise of the claim we make.
AbTF	Indicators 2.2.3 and 2.2.4. Not a Minimum Requirement for Large Farms to implement some type of water management plan? What does „use of groundwater complies with all formal requirements“ mean? Criteria 2.3: Completely vague. What are the water management practices recommended? Also indicators are not clear. To know (as you write in Guidance) that there is „a considerable amount of guidance“ is not very helpful if you don't get this guidance. Question 4: don't agree if there are no operational key recommendations that are concretely worded out.
Israel Cotton Board (ICB)	Guidance on water management and savings methodology will be required, such as plant monitoring systems, water measurement and control methods and more.
Better Cotton Initiative	who will define the requirements for "adaptation to climate change". In developing countries farmers including LF doesn't have appropriate resources/knowledge on climate change and its requirements.
Freelance - Certified Better Cotton Trainer	Steps towards ensuring water efficiency are already contributing to climate change adaptation - however the concepts of climate change, climate change adaptation and mitigation can be explicitly incorporated within this process e.g. guidance for implementation should include a narrative on how measures for efficiency contribute to climate change adaptation and/or mitigation
Better Cotton Initiative	Cotton is essentially a Xerophytic crop that does not need much water, in India if the Development of the crop especially boll formation can be tuned to the soil moisture regime the yields will go no requirement of irrigation. It would be another thing that the water saved by the farmer would be utilised by him for other crops or by other farmers.
BCI	I Agree but would strongly recommend to make the connection in a more tangible way with more specific indicators. In a rainfed context, this is where this criteria should play a major role in the future due to disturbed rain patterns and an orientation to basic irrigation technique overtime.

### Generally, how satisfied are you with the suggested version of Principle 2?



### Do you have any other general or specific comment or suggestion to make on Principle 2?

Name of your organization	Comment
Alliance for Water Stewardship	AWS is experiencing demand from the cotton sector. If BCI certificate holders want to also achieve AWS certification, then it is suggested that the AWS Standard is reviewed and relevant elements incorporated. Depending on demand, BCI could consider either requiring Large farms to meet the AWS Core Criteria, in order that they may be dual certified, or up the game further by requiring all to be Core certified and Large farms to apply certain of the AWS Advanced Criteria. It is also suggested to analyze the WWF comparison of standards water related requirements: <a href="http://d2ouvy59p0dg6k.cloudfront.net/downloads/wwf_ws_ag_standards.pdf">http://d2ouvy59p0dg6k.cloudfront.net/downloads/wwf_ws_ag_standards.pdf</a> I have discussed these options with Gregory Jean and am happy to elaborate further for the standards development group if needed.
BCI China Office	I suggest to be more specific on what is water management and how the water management is linked to climate change.

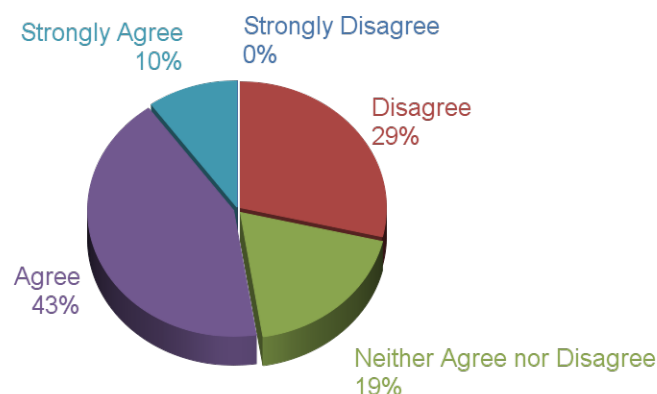


31	
Oregon Tilth	Question 3: In drought affected areas, yes, but with the understanding that water meters for wells are not inexpensive and this could be a barrier to compliance for growers in developing countries. For farms that don't have a large irrigation management system, it is difficult to quantify the exact amount of water used for cotton if the well water is used on other crops at the same time.
Better Cotton Initiative	I find some of the wording a bit vague. What is the difference between 'adopt' and 'implement'? Not sure I understand the difference here.
AFPRO (Action For Food Production)	Question1: Should be through guidance of implementation. Practical drip irrigation system is designed for cotton crop and will be used & control by farmers for wetting of roots as good management practices. Question 3: Equity of water by sharing of water is very essential, in Indian context, majority of farmers are small and owned leased land. It can be adopted for 2.2.2 also General comment: Appropriate water management plan needs to be developed. Irrigation water quality or rain water quality for better production is import. Aspect of irrigation like combination of ground water and surface water or alternate irrigation provide better results on crop. Water budgeting exercise should be implemented in clusters/villages/beneficiaries should be empowered with water budgeting so as to allocate required water for specific crop. Trainings on water budgeting is in practice to all beneficiaries- small, medium and large farmers.
Shandong Nongxi Cotton Cooperatives	No Comments
BCI	I get anxious about requiring farmers to have a formal, written plan for various aspects of the standards. It seems good in concept, but is challenging in practice. Many farmers farm BECAUSE they don't like doing desk work, and we in the 'desk work culture' need to be cautious about imposing our framework on them. I think more important than having a plan is having the management 'habits' of knowing what things to monitor, having the tools to do so, and the capacity to make management changes in response to the 'data'. Again, that comes down to skillful assessment, both in how the SA is designed (and the guidance provided therein) and how the verification is performed.
Cotton Australia (myBMP)	Inroduction to the principle: The importance of climate change adaptation and mitigation does not require that dedicated criteria are required, rather the issue can be highlighted in guidance material: good agricultural practices are good agricultural practices and need to take into account all relevant circumstances including climate change / climate variability. A dedicated criteria as proposed will merely duplicate the good agricultural practices required to be adopted under the other criteria for water management, and thus be redundant. Access to water in limited in Australia, and water and the energy required for pumping are significant costs for growers. There are other effective drivers for continuous improvement in water use efficiency. Criterion 2.2: Not clear why the different wording between 2.2.1 (SH) and 2.2.2 (MF), i.e. what's the difference between adopt and implement? Question 3: Is there an error here? Should it read ...applied to small & medium farms? Small & medium farms should be working towards this, especially where underground water is in short supply. General comment: The importance of climate change adaptation and mitigation does not require that dedicated criteria be added to the principle, rather the issue can be highlighted in guidance material: good agricultural practices are good agricultural practices and need to take into account all relevant circumstances including climate change / climate variability etc. A dedicated criteria as proposed will merely duplicate the good agricultural practices required to be adopted under the other criteria for water management, and thus be redundant

## **PRINCIPLE 3: SOIL HEALTH**

33 Question 1 - p.43:

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



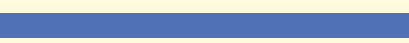


**Please explain your answer**

Name of your organization	Comment
BCI China Office	In China, small farmer usually don't do individual soil test since it is quite expensive. Usually, for a village, local agriculture promotion center will select several spots for collections of soil samples and conduct the test, then the center will share the testing results to the farmers for their reference. But it also depends on the management of local government to the technology promotion center, therefore it is not always the case.
FFPSD/GIZ Tajikistan	I feel it important for any farm/field size to base fertilization on good and scientific knowledge of soil condition. However, it should be possible for Smallholders to do this on Learning Group level rather than on individual farm/field level
Sociedade Algodeira do Niassa, JFS - SA	Our farmers are very poor . They don't have money to make soil test . Also they made rotation between cotton and maize. Maybe we can try to do some analyses but in any case they don't have money to correct the soil or improve the soil .
Oregon Tilth	Dependent on the availability and cost of soil testing for small farmers, I would encourage the use of soil mapping tools and soil tests. Identification of soil types will help farmers determine what amendments, nutrients and cover crops to use to build up soil health before planting cotton.
AFPRO ( Action For Food Production)	In case of small holders to comply the criteria would be affected. However, Soil nutritional status and fertility status vary with cropping pattern, distance, topography etc. Proper nutrient management practices & C:N ratio management required for better sustainable The Indicators may include; 3.1.5 Soil health cards with fertilizer recommendations are provided to farmers 3.1.6 Estimated number of farmers aware about importance of soil sustainability and will capacitate to ensure the same
Better Cotton Initiative	Whereas I agree in principle, I would question how this might realistically be imposed &/or implemented, especially at a Smallholder level. Will testing equipment be available? What exactly should they be testing (at a minimum)? How much will it cost and who will pay for it? Is soil testing to be done on all farms, or on a sampling basis (i.e. similar to assurance methodology, and covering a selection of farms per year)? Note: Indicators 3.1.1. and 3.1.2 have exactly the same wording.
Shandong Nongxi Cotton Cooperatives	smallholders and medium may not want to bear the cost and may not have the resources to do the soil testing. Would suggest to put it as improvement requirements

IDH The Sustainable Trade Initiative	Agree, though I do not have enough information to confirm if this is possible for every smallholder especially in India - facilities for soil testing and receiving almost immediate responses which would enable optimization of inputs application. In principle, this is definitely a recommendation I would put forward wherever possible. I would put it as an improvement requirement - not a minimum requirement without this complete validation
AbTF	Agree for application to Medium Farms. Strongly disagree for application to Smallholders
WWF	In our view - criteria 3.1.3 and 3.1.4 should be minimum requirements for large farms, and improvement requirement for SH and MF as this is the basis for better Practices.
Israel Cotton Board (ICB)	Medium yes. For SH soil management issues may be required at the management PU level.
Better Cotton Initiative	Soil testing should be applicable to all types of farmers, but requirements may be different e.g, for LF and MF at individual/farmer level. For SH t LG/Village level. Similar testing frequency also need to be explained.
Freelance - Certified Better Cotton Trainer	I actually strongly agree but the option is not available above. For farmers to take informed decisions, it is crucial to support the development of habits facilitating data analysis (soil testing results linked with the soil needs) This way options of increasing soil fertility (health) can be shared as this does not necessarily require just fertilizers but also practices like rotation of specific crops to nurture the soil.
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	Soil testing should be required from MF and LF but not from SH
Better Cotton Initiative	this would be mammoth task better that we work with existing programs of the government for instance the soil health card of the Indian government ( may not be perfect) or we look a the village level to identify the key interventions that are needed. In India over use of N is a major problem as this is heavily subsidised and its over use is causing major problems in cotton farming.
COTTONCONNECT	It's a very high cost to test soil for smallholders and medium farmers.
BCI	This indeed VERY critical smallholders but usually requires the contribution of research institutes or IP investment in soil testing. indicator (for not being too prescriptive) could be the contact and partnership signed at PU level with a recognised and competent regional or national body that can provide guidance and capacity on soil testing. one other requirement could be that PU manager has in hands the soil mapping that encompasses recommendations for the area its farmer work in.

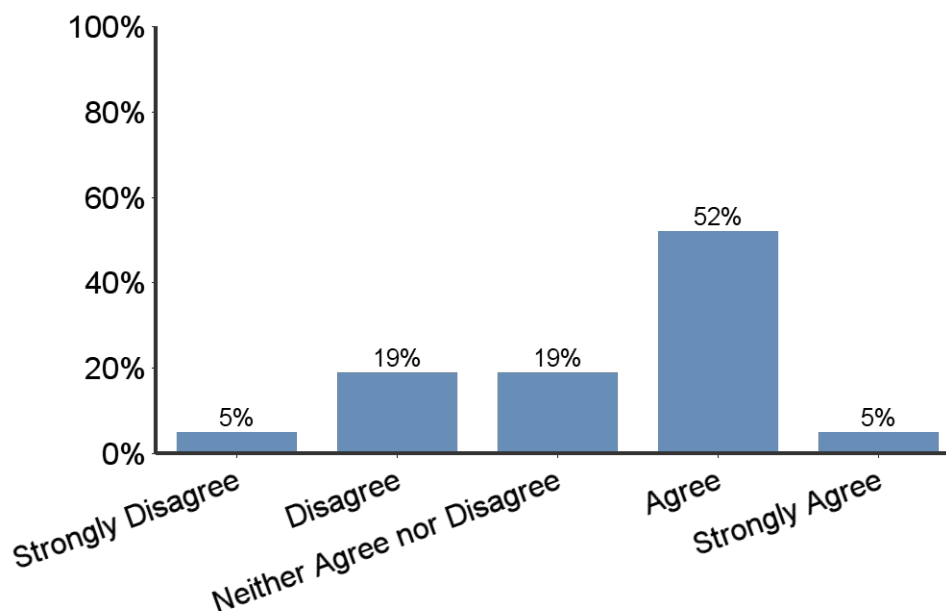
### Question 2 - p.44:

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

#	Answer	Bar	%
1	Yes		73%
2	No		14%
3	I don't have an opinion		14%
	Total		100%

**Question 3 - p.52:**

**Do you agree with the decision to create a new criteria dedicated to good soil management practices ensuring climate change mitigation?**

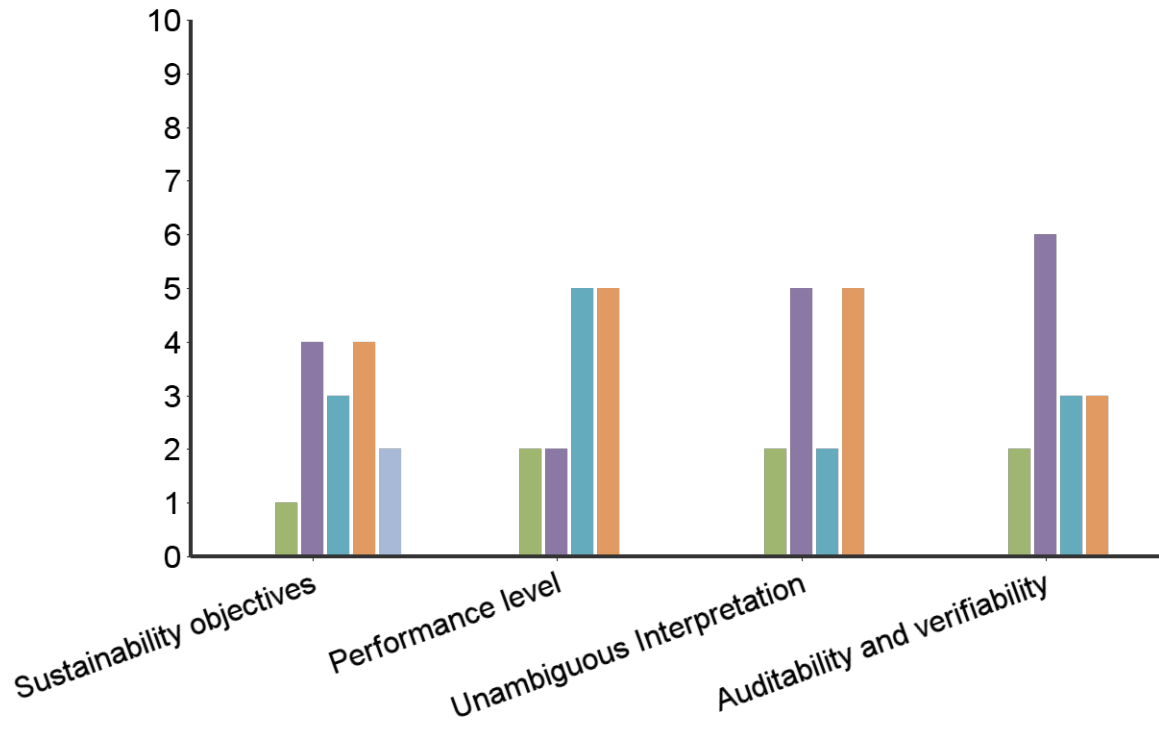
**Please explain your answer**

Name of your organization	Comment
BCI China Office	While I agree with the newly added criteria, I would suggest that explanation to be provided as follows, 1. Good soil management practices 2. What is the linkage between soil management and climate change
FFPSD/GIZ Tajikistan	3.1 - 3.3 implemented properly should actually result in 3.4 . Why not include the 3.4 (wording and guidance for implementation into these?
Oregon Tilth	In the Soil Biology Primer, published by the Soil and Water Conservation Society (US), "Land management practices can be chosen to increase the amount of carbon sequestered as soil organic matter and reduce the amount of CO2 released to the atmosphere."
AFPRO (Action For Food Production)	Yes New Indicator on good soil management practices ensuring climate change mitigation and adaptation
Better Cotton Initiative	Good soil management practices are desired for various reasons: - They can increase crop productivity, which leads to increased profitability; - They can mitigate climate change If you have to choose between two sets of 'good' management practices, one that optimises crop productivity and another that mitigates climate change (with some reduction in profitability), which is most important / has the highest weighting?
Abrapa	The theme needs awareness to be raised first. Increasing criteria and demands are a rproblem. People would think as a start that there's more to deal with. Nobody wants that..

IDH The Sustainable Trade Initiative	If yes, then it needs a lot of guidance to track, measure and report - with very specific guidelines from BCI. From the various sources of emissions related to cotton farming, many areas especially the indirect sources, have been mentioned where the standard specifies no other indicators. There will also be various local factors that will influence the results over a season.
WWF	With the new Paris Agreement carbon emissions out from agriculture activities will be more in the middle of attention in the next decade, therefore it is wise to prepare farmers for this new developments which will affect agriculture production systems in future. Sufficient guidance should be provided.
Israel Cotton Board (ICB)	Important as an indicator and feasible at a producer level
Better Cotton Initiative	Wording "Management practices ensuring climate change mitigation" are strict and may not be applicable in many developing countries as the farmers don't have resources/knowledge/information on climate change. May be applicable only if we clearly define/explain management practices at local level.
Freelance - Certified Better Cotton Trainer	I am reluctant to say yes or no actually - I would say yes for large farms and no for small and medium farms for the reason I added in my notes above. Small/Medium farms should definitely start to get familiar with the concepts and no more for now!
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	The intent the guidance needs to be more clear and detailed. It is difficult and little to technical to understand
Better Cotton Initiative	these are terms that a SH and even our Implementing partners will not understand, I agree that good soil management practices are very very important and indirectly it may minimise soil carbon emission and increase carbon sequestration. Lets stick to the basics.
COTTONCONNECT	it's difficult for farmers to understand what's carbon emission or sequestration. and it's not easy to evaluate the carbon emission and sequestration.
BCI	on 3,2 I do not understand why the term organic fertiliser is never used not even in a indicator? should the optimum formula or the Nutrients (as stated) not be a perfect mix or organic and synthetic fertilisers. I am very concerned BC farmers tend to use more NPK as first fix but then do not tend to decrease it to the profit of organic fertiliser. This aspect should be reflected here. on 3.4, 343 and 344 are not for SH! I would encourage to integrate this notion but why do you restrict it to SOIL carbon emission if you want to integrate the all impact of fertilisers, seems a bit restrictive. the measures in the smallholders context will be challenging or often impossible so the practices will need to be guided once proven that they have an effect on GHG emissions and sequestration. I see sequestration as a closer link to Land use but I may be wrong.

Generally, how satisfied are you with the suggested version of Principle 3?

Very Dissatisfied   Dissatisfied   Somewhat Dissatisfied   Neutral  
Somewhat Satisfied   Satisfied   Very Satisfied



### Do you have any other general or specific comment or suggestion to make on Principle 3?




Name of your organization	Comment
BCI China Office	I suggest to be more specific on "Estimated number". Maybe to use the percentage of the farms will be more reasonable.
FFPSD/GIZ Tajikistan	Question 2: With soils and soil management being the basis for agricultural production, it seems very logical to make 3.1 a minimum criteria. However, change and improvement of soil management practices is a long-term task and a farmer new to the BCI scheme without prior training or knowledge about soil management, will realistically not be able to adopt management practices in year 1. If minimum criteria means preparing in year 1, adopting and implementing in year 2 ff, then my answer will be: Yes. General comment: I do not find the following (3.2 criteria, Intent) well phrased: "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." Since over dosage of nutrients also can have negative effects not only on the environment (e.g. unbalanced N-P-K may result in weak fibre), I would like to suggest: "Cotton .....yields. Unbalanced N-P-K application can negatively influence yield and fibre quality." 3.4.3 and 3.4.4: Are they for MF as well as LF?
Sociedade Algodeira do Niassa, JFS - SA	This will be special difficult here in Mozambique because by cotton rules as Mozambique Cotton Institute demand that all cotton residues must be burn because of the eggs of pests.
Oregon Tilth	Question 2: Soil health is absolutely fundamental to the health and productivity of the cotton crop. In the Soil Biology Primer, published by the Soil and Water Conservation Society (US), speaks to the biological complexity in a soil system and how it "can affect such processes as nutrient cycling, the formation and structure of soil, pest cycles, and decomposition rates." A complex soil food web contains many different organisms that can compete with disease-causing organisms and reduce to need to pesticides over time. General comment: Carbon sequestration is common knowledge in agriculture now and BCI needs to include language in the standards that promote practices for soil health as a part of climate mitigation.
AFPRO (Action For Food Production)	QuesTion 2: Yes, In some cases it would be difficult for small farmers. Provided to small holder farmers are being supported by different Government department and academic institutions General comment: After soil testing fertilizers should be recommended based on soil test. This will reduce the fertilizer consumption and ensure the water consumption. This will assist in climate change mitigation and adaptation approach. Region specific inter-cropping/cover crops should be identified and promoted. For this collaboration with local/regional agricultural universities/KVks is explored.
Abrapa	Take it ease with carbon request. Awareness first.
Shandong Nongxi Cotton Cooperatives	I suggest that the "estimated number" should be explained clearly. How to evaluate whether how many or what percentage of "estimated number" is acceptable?
Cotton Australia (myBMP)	Question 2: The criteria should be changed to: "The Producer must adopt soil management practices that maintain or enhance the structure and fertility of the soil" That is "and enhance" should be replaced with "or enhance". Indicator 3.4.1: not necessarily straight forward as there is tension between these 2 aspects; Land use and management practices that sequester soil carbon can impact on emissions of the greenhouse gases N2O and CH4, and the interactions between these gases and carbon balance can be complex (Tang et al. 2006). For example, if nitrogen-based inorganic fertilizers and/or organic amendments are applied to enhance plant growth, this may lead to carbon sequestration in vegetation and soil, but such benefits could be partially or completely offset by increased emissions of N2O (Dalal et al. 2003). Indicator 3.4.2: While this criteria's inclusion is not supported, not sure what the distinction between GHG emissions are an 'soil carbon emissions' (presumably referring to methane and carbon dioxide), as these are both classified as GHGs Indicator 3.4.3 and 3.4.4: This would be included / captured in 3.4.1 - and in any event, all these practices should be included under 3.1 anyway, and the issue of GHG emissions dealt with in guidance material / importance etc. Rationale for change 3.4: Agree, but that doesn't necessarily require a dedicated criteria



39	BCI	1) I think the Principle should be renamed Soil Conservation, Soil Health, and Carbon Sequestration. Management to minimize erosion has very little to do with soil health, but is about conserving soil. 2) The current language about Intent talks a lot about the benefits to the environment of soil management, but says little about the importance of protecting soil as a fundamental, long-term resource/asset to productive farming. That language should be added. 3) There seems to be some missing text in 3.3.1 and 3.3.2
	IDH The Sustainable Trade Initiative	This principle has always been broad - if there is any minimum criteria, it needs be specific and very relevant to local adaptation.
	WWF	Principle title: BETTER COTTON FARMERS CARE FOR THE HEALTH OF SOIL Suggestion : [...] care and IMPROVE Principle Intent: - [...] zero or no-tillage,[...]: on the other side no-tillage production systems increase the use of BT-Cotton, Glyphosat, Round up Ready e.g. better is to promote conservation or minimum tillage systems - [...]soil structure by protecting the organic matter[...]: INCREASING and protecting - [...] The use of cover crops may also reduce nutrient leaching [...] The use of cover crops promotes an increase of the soil biomass, increase nutrient cycling, reduces leaching, help suppress weeds, while legume..... The use of organic fertilizer like compost or manure, or even husks and leaves will also promote the benefits just mentioned. - Cultivating the soil stimulates [...] Replace "cultivation" by "ploughing". Indicator 3.1.2: Mandatory for MF and LF Indicator 3.1.3 and 3.1.4: Both 3.1.3 and 3.1.4 should be mandatory for LF. What should these soil tests monitor? Are we referring to fertility which will be the basis for 3.2? Are we referring to soil compaction? Are we referring to soil carbon only? Question 2: For large farmers yes. For SH and MF this could still be an improvement criteria which at least includes a soil quality management plan. Indicator 3.2.3, 3.2.4 and 3.2.6: Mandatory for LF and improvement for MF. Indicators 3.3.3 to 3.3.6: should be minimum for LF
	Israel Cotton Board (ICB)	Question 2: 1/ It is important for sustainability 2/ It is feasible for farmers to adopt and abide by such a requirement
	SGS-CSTC Standards Technical Services Co., Ltd.	3.1 Proposal: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% 3.2 Proposal: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% 3.2 Proposal: P8: Please explain the precision agriculture technologies for fertilizer clearly We agree : Implement soil testing as a minimum requirement through indicators under current principle or under EIA principle if created. 3.3 Proposal: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Proposal: Please explain clearly what the eroded area means and add one more choice followed by Yes and No, ( ) not applicable
	Freelance - Certified Better Cotton Trainer	Criteria 3.4: These new additions are somehow worrying - although I can understand the reasons behind it I have the feeling it is too early [I am only looking from the perspective of the countries I work with - Turkey directly Better Cotton - Different regions of Africa at producers level not necessarily Cotton Producers] What we do not know is scary and can have an impact on motivation - Maybe an option is to keep these criteria only for large farms but introduce other criteria for SF/MF aiming at creating awareness on climate change, climate change adaptation and mitigation [as I said earlier a starting point is to link existing practices within BC production contribution to climate change adaptation and/or mitigation]
	IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	Criteria 3.1: In the criteria "health" can be added : 'The Producer must adopt soil management practices that maintain and enhance the structure, HEALTH and fertility of the soil' Indicator 3.1.2: and 3.1.1 are the same : 3.1.2 should be not "adopting" but maybe "implementing" Indicator 3.1.3 and 3.1.4 should be IR also for LF In Guidance for Implementation in P:43 for Criteria 3.1, first part of the criteria should be in 3.3 but not here, because it talks about erosion Criteria 3.2: If the criteria 3.1 turned into MR. there is a need for clarification about what exactly require from farmers as MR only soil testing or application based on soil testing. Indicator 3.3.2 and 3.3.1 are the same : Maybe 3.3.2 means 'implementing' but not 'adopting' P:49 It is marked as 'Climate Mitigation' but it should be 'Erosion Mitigation' Indicator 3.4.1 and 3.4.2 one talks about carbon emission the other GHG emission. This needs clear description. Also carbon sequestration needs clear description Indicator 3.4.3 and 3.4.4 should be marked as LF not SH
	Better Cotton Initiative	The caring of soil health is the key, in India and especially for cotton the right doses are very essential and the timing of the same relating to the crop development is really the key. The handling of Farm Yard Manure needs to be improved. So the whole gambit of intercrops, rotations, green manuring are extremely essential.
	Water Footprint Network	Question 2: Adequate soil management is not only critical for the yield and the long term sustainability of land use, as it is crucial for water use efficiency increase and sustainable water use. Therefore, small and medium farmers should adopt the required management practices that lead to adequate soil management.

## **~~PRINCIPLE 4: BIODIVERSITY ENHANCEMENT~~**

**Question 1 - p.55:****How would you like to call Principle 4?**

#	Answer	Bar	%
1	"Better Cotton is produced by farmers who conserve natural habitats"		35%
2	"Better Cotton is produced by farmers who enhance biodiversity"		52%
3	I don't have an opinion		13%
	Total		100%




**Please explain your choice**

Name of your organization	Comment
BCI China Office	Enhance biodiversity seems to be a higher requirement in reality.
FFPSD/GIZ Tajikistan	Option 2 seems better suited to a holistic approach towards on farm practices. Small holders and medium farms might not have much scope to influence natural habitats in surrounding areas.
Oregon Tilth	For US farmers who might not have land with existing natural habitats, Principal 4 is more attainable if they are verified on the premise that they use farming practices that enhance biodiversity.
AFPRO (Action For Food Production)	Option 2 is revised and better one as it covers first conservation aspects itself.
Better Cotton Initiative	Can we not have '... conserve and/or enhance natural habitats and biodiversity.'?
Abrapa	This is the best way to enhance biodiversity in Brazil.
HCV Resource Network	This option seems to include more possible activities or actions by the farmer. Option 1 is just about habitat conservation, but option 2 can include the enhancement of biodiversity through habitat conservation, soil conservation, crop rotation, water protection, prevention of erosion, etc.

Shandong Nongxi Cotton Cooperatives	"enhance biodiversity" seems to be a higher criteria than "conserve natural habitats". In reality, it is more practical to "conserve natural habitats".
Cotton Australia (myBMP)	Measuring and monitoring biodiversity enhancement is difficult, time-consuming and expensive to do properly, so not a feasible basis for the principle; better done via long term M&E of impact. Suggest changing to "Better Cotton is produced by farmers who conserve or enhance biodiversity". Either is a good outcome for biodiversity.
BCI	BC is produced by farmers who PROTECT and enhance biodiversity on and surrounding the farm. Protecting what's already there is important; making management decisions that increase biodiversity is also important. Let's include both in the language.
IDH The Sustainable Trade Initiative	If they conserve the natural habitats, it will maintain the biodiversity. If this is not already being done with strong intent, then starting with conserving the natural habitat as is , is the first step.
WWF	In our view it should be "protect and enhance" or "conserve and enhance" as this shows the potential for biodiversity gains due to BCI implementation.
Israel Cotton Board (ICB)	Option 1 because this is language clearer to producers and linked to related practices they may undertake. Enhancement of biodiversity is less clear to producers and definitely not measured by them. They should not be asked to declare about something they have no idea if and how much they are impacting like biodiversity
SGS-CSTC Standards Technical Services Co., Ltd.	biodiversity used in agricultural practice is more appropriate
Freelance - Certified Better Cotton Trainer	At least in Turkey, BCI farmers already cannot farm in lands that are not designated as farmlands - However, farmers aiming at enhancing biodiversity will need to (re)learn how biodiversity and agriculture can support each other... An indicator that could be added would be farmers cooperating with Biodiversity protection institutions (Government and/or NGOs) to understand/learn the existing species in their land and develop species enhancing activities
Better Cotton Initiative	its very important that farmers realise the importance of this. The point of intercropping with legumes, borders to prevent pest built up are related to this and link up well with the Principle 1 and Principle 3. Mono coping is slowly becoming the order of the day and we need to focus on the same.
COTTONCONNECT	it's much easier to understand the meaning of the principle.
BCI	very different notion which now puts the farmers in an proactive dynamic ! 4.1 sees a big change it is now a minimum requirement for SH. .I do agree with this change but indicators will need to be defined for auditing pruposes. should have been definitely a minimum requirement for LF long time ago....

### Question 2 - p.59:

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

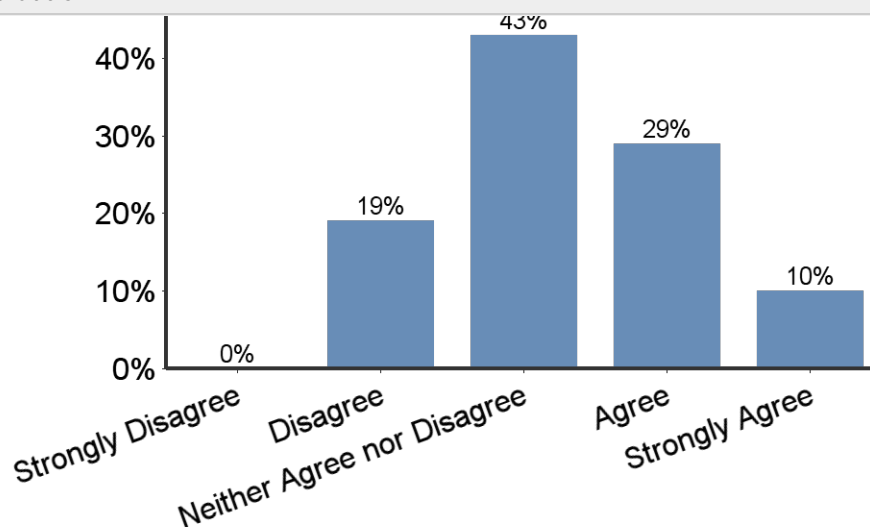
1	Yes		32%
2	No		18%
3	I don't have an opinion		50%
	Total		100%

**Please explain your answer**

Name of your organization	Comment
BCI China Office	Still needs to understand whether the subject SEIA is in line with Chinese legislation. In China, the use and conversion of the land should abide by the law and receive the evaluation from local environment bureau.
WWF	Yes if this is a zero conversion of any native vegetation.
Israel Cotton Board (ICB)	It is hard for me to know if this cut-off date is feasible and realistic for the relevant geographies
SGS-CSTC Standards Technical Services Co., Ltd.	longer conversion period, e.g. on 1 January 2017
Oregon Tilth	The sooner the better to address indigenous land rights in Brazil.
Better Cotton Initiative	I assume this revised Standard will come into effect not before the end of 2016, therefore January 2017 seems more applicable.
Abrapa	Cotton, in Brazil, might be sowed until midfebruary. Is that the question? It is not clear to me.
HCV Resource Network	Will it be clear in the guidance what the minimum farm size is which would trigger this requirement?
Shandong Nongxi Cotton Cooperatives	I think it is as early as possible.
BCI	no so sure about the impact of it but to make it simple I would go for this. I would add that there shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since 1st January 2016. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced. Cotton crops are removed at the end of current rotations from sites on identified HCV where assessments show that further crop is restricted and such sites shall be restored to natural vegetation and hydrological processes
BCI	I don't have enough knowledge of this topic to comment.

**Question 3 - p.61:**

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






## Please explain your answer

Name of your organization	Comment
HCV Resource Networ IDH The Sustainable Trade Initiative	Not clear who is left with choice for SEIA methodology: the SEIA consultant? the farmer? What if BCI recommends/requires certain minimum requirement of content in the SEIA report e.g. like IFC.  Yes, I don't believe our current implementing partners have the capacity or the knowledge to lead this exercise.
BCI China Office	In China, the land ownership belongs to the government instead of the individual farmer. As indicated above, the SEIA usually is conducted by the local environment bureau or research institute. <a href="http://www.china-eia.com/en/">http://www.china-eia.com/en/</a> My concern is the cost and time associated with the independent SEIA and how it will influence the MF and LF.
WWF	Also an Independent HCV - Assessment could be accepted as one methodology. If we go for Zero conversion of any native vegetaion from 2016 on, the need for a SEIA assessment is reduced and it will be much easier to monitor and to communicate to stake-holders how BCI deals with conversion.
Israel Cotton Board (ICB)	This should be an extremely unbiased assessment
Better Cotton Initiative	In general agree with the criteria, have one question: who will responsible to organize/manage the Social and Environmental Impact Assessment.
Better Cotton Initiative	Not sure that I understand this question ... :-(
Abrapa	On the other hand, Brazilain laws are very strict about both subjects.
HCV Resource Network	Does this mean leaving the choice for SEIA methodology to an independent consultant/consulting company? Or is the methodology the choice of the farmer? Question not 100% clear. It may also be that there are national requirements on SEIA report contents (if not methodology).
Shandong Nongxi Cotton Cooperatives	It is crucial that SEA should be conducted before any actities is carried out to the Better Cotton area.
BCI	OK as long as it is from accredited body with a transparent methodology, including stakeholder s consultation. What about Restoration? shall we have an indicator on : returning degraded or converted areas within the plantation to a semi-natural state.
BCI	I don't have enough knowledge of this topic to comment.

## Question 4 - p.61:

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?

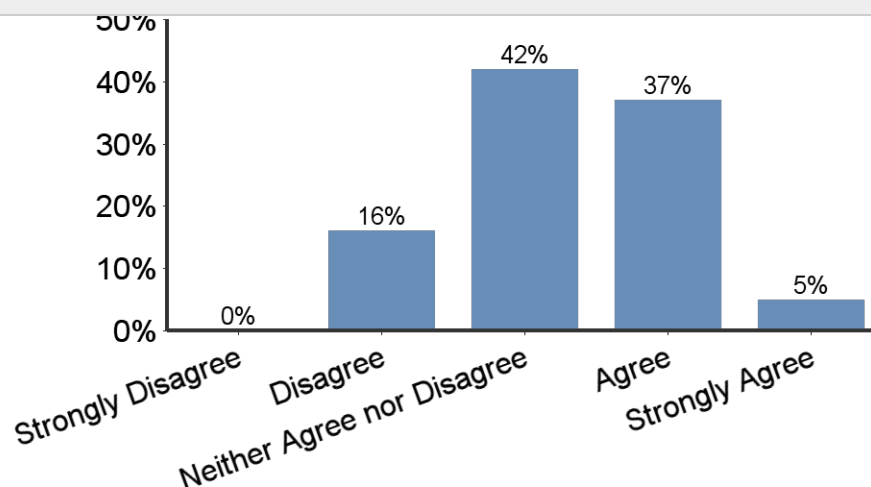
#	Answer	Bar	%
1	Yes		55%
2	No		40%
3	I don't have an opinion		5%
	Total		100%

### Please explain your answer

Name of your organization	Comment
HCV Resource Network	It depends on how much conversion of natural habitat is expected to be caused by smallholders. Maybe smallholders could have a simplified approach to SEIA and HCV?
BCI China Office	I think it will be more practical as the legislation in China about the land conversion is quite strict.
WWF	If we go for Zero conversion of any native vegetation from 2016 on, the need for a SEIA assessment is reduced and it will be much easier to monitor and to communicate to stake-holders how BCI deals with conversion.
Israel Cotton Board (ICB)	For the time being. A mechanism whereby PU's act on behalf of SH's needs consideration. Presently this is beyond the power and capabilities of SH's
Better Cotton Initiative	Should be applicable to all. In many cases all 3 categories of farmers are in the same locality. Same land useable for one type of farmers and not for the others, doesn't look justified.
FFPSD/GIZ Tajikistan	Provided, there is the necessary support and financial means for independent evaluation, this might actually strengthen smallholder communities.
Oregon Tilth	The threat to HCV areas seems to be mostly from medium and large farms with access to capital but in Latin America, slash and burn practices are used in some areas to convert primal forest to agricultural land and it can be in quantities as small as 20 ha. The burning of tropical rain forest is a contributor to climate change and a threat to the life of indigenous people. Smallholders should be included in this criteria.
Better Cotton Initiative	If the threshold is 200 Ha, then it won't apply to smallholders by default. Is the stated 'Area of conversion' applicable to within a 12-month period? If a farm converts 199 Ha in 2017 and 199 Ha. in 2018 do they need to complete an SEIA?
Abrapa	The criteria should be the same to everybody! SH, MF and LF should follow the same requirements. This could cause another problem here.
HCV Resource Network	It depends on how much conversion of natural habitat is likely to be caused by small holders. Perhaps smallholders can have a simplified approach for enhancing biodiversity.
Shandong Nongxi Cotton Cooperatives	It's reasonable. Maybe to MF it is also a bit difficult to apply 4.2

### Question 5 - p.62:

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

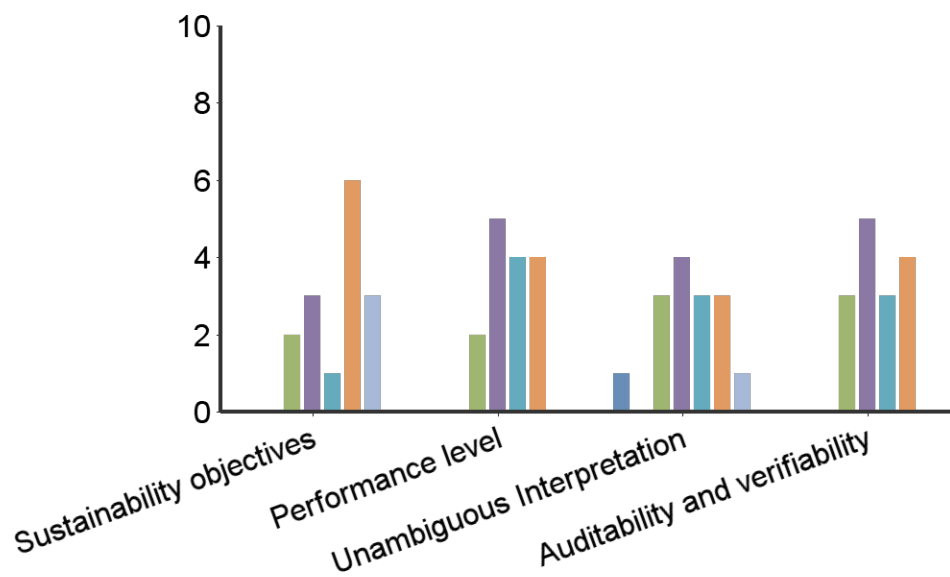


**Please explain your answer**

Name of your organization	Comment
HCV Resource Network	in order to ensure that HCVs are properly identified - there needs to be an HCV assessment. The SEIA report is a useful input to the HCV assessment.
BCI China Office	It seems to be too much for the principle of biodiversity enhancement
WWF	This depends on the local situation, we would recommend to open the possibility for both ways, included in a SEIA but also possibly to do this separate. If we go for Zero conversion of any native vegetation from 2016 on, the need for a SEIA assessment is reduced and it will be much easier to monitor and communicate
Israel Cotton Board (ICB)	One assessment should be undertaken. SEIA should be accredited to undertake HCV. Keep it simple and affordable, and not cumbersome and expensive.
Better Cotton Initiative	In principle this seems like a sensible recommendation, but reluctant to 'Agree' or 'Disagree' without understanding how these are conducted in practice. Availability of expertise in all countries, time-frame to implement, cost, etc. are all important to be aware of if we want this to be something which can reasonably be implemented.
Abrapa	What?! One the first requests I made to the "new BCI" (the one which is less of a NGO, birds and bees) is to stop using initials! Most of us speak another language as a mother language and it is very hard to translate and understand initials. It may sound obvious to you HCV, but not for me.
HCV Resource Network	SEIAs do not include identification of HCVs. It is only possible to combine SEIA and HCV assessments if the assessors are competent in both kinds of assessments. Since SEIAs do not normally include HCV identification, there would need to be an HCV assessment requirement added.
Shandong Nongxi Cotton Cooperatives	It will be a more complete evaluation for BC implementation
BCI	in Lieu for LF.

**Generally, how satisfied are you with the suggested version of Principle 4?**

Very Dissatisfied    Dissatisfied    Somewhat Dissatisfied    Neutral  
 Somewhat Satisfied    Satisfied    Very Satisfied





**Do you have any general or specific comment or suggestion to make on Principle 4?**

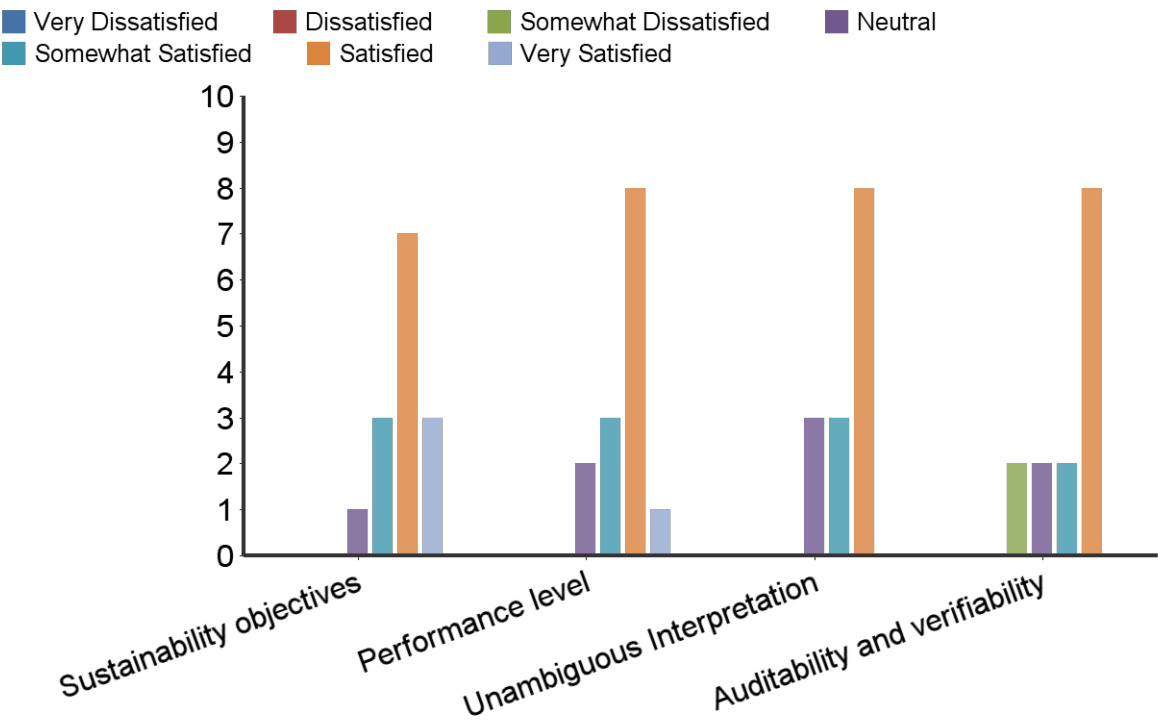
Name of your organization	Comment
BCI China Office	No at this moment
Oregon Tilth	BCI verifiers of large farms in the US have to make sure land in the Conservation Reserve Program administered by the USDA is not taken out of the program to grow any crops prior to completion of the contract.
FFPSD/GIZ Tajikistan	I find the wording of 4.2 a bit unclear and would like to suggest instead: "For the conversion of non-agricultural land to be used primarily to grow cotton, the Producer must follow a....
AFPRO ( Action For Food Production)	Can district authority and forest authority be in participatory approach with BCI for biodiversity enhancement. (e.g. Plantation of trees and fodder species at forest land area)

42	Abrapa	HCV?!
	HCV Resource Network	<p>I have some very specific comments which might be better sent to you by commenting directly on the draft - but will include a summary of concerns here: 1. the wording should not be "no net loss of HCVs". The problem is with "NET" loss. Instead, there should be no loss of HCVs. When NET is introduced it makes it difficult to interpret and verify. 2. SEIAs do not include identification of HCVs, therefore we cannot expect normal SEIAs to pick up on HCV presence on farms. 3. It is "recommended to use licensed assessors" - this is also problematic. Is it only ever recommended or are there cases where it would be required. If ALS licensed assessors are not necessarily appropriate for most BCI farms - then perhaps a different requirement like HCV assessors must be recognized by the HCV Resource Network....leaves it open for the HCV approach we're currently developing. 4. There is mention of following national regulations, but also internationally recognized standards. Which internationally recognized standards? It seems too vague and open to interpretation.</p>
	BCI	<p>1) While I understand the importance of land conversion issues to biodiversity, it dominates the larger Principle as currently written. Conversely, there is very scant description or guidance about the different types (invertebrate, mammal, microbial) of biological diversity on a farm and the variety of means to protect and enhance each. The latter should be improved in the Principle. 2) Disagree with 4.1.1. It's not a 'criterion' for a producer; it's an aspiration that BCI will provide appropriate info to producers about how to manage for biodiversity. Not appropriate here. And do we really want to take on that role/ responsibility? In the US, a more appropriate criterion is whether the producers has identified biodiversity challenges, and consulted locally appropriate authorities and source when formulating a response? Similar to the current language. 3) In the United States, the prevailing regulatory guidance comes from the Endangered Species Act, a mechanism for identifying species at particular risks, and prescribing means to avoid further threats to same.</p>
	Cotton Australia (myBMP)	<p>Indicator 4.2.3: Vegetation clearing for agricultural purposes is strictly controlled by government vegetation laws in Australia (see below). Approvals are not granted unless environmental outcomes are either maintained or improved. Cotton Australia does not see the need for, nor does it support additional requirements for land conversion. New South Wales · In 2005, the NSW Government introduced the Native Vegetation Act 2003, (NV Act) to end broadscale land clearing across the state. · all clearing of remnant native vegetation or protected regrowth requires landholders to seek approval to a property vegetation plan (PVP) from their Local Land Service (LLS) · A PVP that proposes broadscale clearing cannot be approved unless the clearing will improve or maintain environmental outcomes. <a href="http://www.environment.nsw.gov.au/vegetation/approval.htm">http://www.environment.nsw.gov.au/vegetation/approval.htm</a> Queensland · Clearing of native vegetation for high-value and irrigated high-value agriculture is controlled by vegetation management laws. · Involves an application and approval process · Applications for development are assessed on 1. Economic viability 2. State Development Assessment Provisions (SDAP) · The SDAP requires assessment against the Performance Outcomes for: 1. Wetlands 2. Watercourses 3. connectivity area 4. soil erosion 5. salinity 6. conserving endangered and of concern regional ecosystems 7. essential habitat 8. acid sulphate soils</p>
	HCV Resource Network	<p>Criteria 4.1: [...] surrounding the farm. will a radius be specified? may be difficult to implement and verify this 4.1 Intent: - [...] It may act as a trap crop for crop pests: It is not clear to me what this means. What may act as a trap crop? Biodiversity? Do you mean cover crops? - [...] most fertile and productive part of the landscape[...]: Do you want to say that riparian land is the most productive? Is that potentially confusing because production is not allowed in those areas? Indicator 4.2.2: Regardless of size? Indicator 4.2.3: SEIAs do not typically include HCV identification. If you are concerned about HCV identification and preventing the loss of HCVs during conversion, it would be necessary to require some form of HCV assessment. Guidance for implementation for 4.2: - [...] it is recommended to utilize assessors [...]: Not required? - [...] licensed by an accreditation scheme such as that provided by the High Conservation Value Resource Network: perhaps better to require that assessors are recognized by the HCV resource network? - [...] but also internationally recognized standards where such practice exceeds the requirements of local law: which standards? will it be specified in an annex? - [...] 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 [...]: It is not feasible to talk about no "net loss" of HCVs. There should be no loss of HCVs because HCVs are by definition environmental or social values of outstanding value or critical importance. You can't destroy an HCV and then do some other kind of conservation measure to try and compensate. It would be good to discuss this fundamental point. - [...] For planned conversion of areas greater than 200 Ha, a complete SEIA shall be conducted [...]: who determines this? - [...] 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 [...]: would that mean no requirement for HCV assessment?</p>



## **PRINCIPLE 5: FIBRE PROTECTION**

Generally, how satisfied are you with the suggested version of Principle 5?





**Do you have any general or specific comment or suggestion to make on Principle 5?**

Name of your organization	Text Entry
BCI China Office	I would suggest the "estimated number of farms" to be changed to "percentage of the farms". Otherwise, it is quite difficult to evaluate during 2PV and 3PV
AbTF	General Comment: What about defoliation? Are there any requirements / rules that have to be observed? This aspect is missing in this chapter.
SGS-CSTC Standards Technical Services Co., Ltd.	5.1 Proposal: ( ) 0; ( ) 1-19%; ( ) 20-59% ; ( ) 60%-95%;( ) 100% Proposal: One more questions to be added before all listed questions: If you were advised of or identify problems with fibre quality, do you attempt to understand the reasons for the problems (eg. discuss these with other relevant people such as consultants, agronomists, researchers, merchants), and implement actions to remedy the problems? ( ) Yes ( ) No ( ) not applicable 5.2 Proposal: This criteria needs to be more specific, especially on how to define "minimise" Rationale: It is ambiguous for 3PV and IP to evaluate what is the correct understanding on "minimise"
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	The guidance for Criteria 5.1 is very clear and other 6 criteria guidance should be also as clear as it 5.1 and there should be a list as it is given in 'Crop management practices' in other criteria guidances.
FFPSD/GIZ Tajikistan	Is seed management the correct terminology? Or better use seed/raw cotton management?
Better Cotton Initiative	its too long and there are parameters that the farmer will not be able to influence at all. Moreover the single most important factor in India is the issue of Foreign Fibre and the rest of the fibre properties are related to seed and the genotypes that are available. Often measuring Foreign Fibre Contamination is a difficult task as unless the Ginners take care at the ginning level this cannot be measured at all. Often the level of contamination can only be measured precisely at the Spinning Mills and not at the ginning factories. I feel that there are too many statements of the obvious.
Oregon Tilth	Add language to the Fiber Quality criteria stating that GMO seed cultivators should be prohibited to use by BCI cotton producers. It is incongruous to promote farm biodiversity, habitat restoration, and soil health and still be "GMO neutral."
AFPRO ( Action For Food Production)	Ginner and their agent are purchasing cotton on the basis of that day rate (Gujarat). Not on the basis of quality. So, good quality growers discourage due to this policy
Better Cotton Initiative	Some specific reference to the risk posed by contamination from polypropylene fibres (usually under smallholder hand-picking scenarios) would be worth including in the explanatory text.
Shandong Nongxi Cotton Cooperatives	The "estimated number" should be more specific
Cotton Australia (myBMP)	the two themes applied to the two criteria should be reconsidered; 5.1 relates to the agronomic aspects of managing fibre quality (fibre features does not add anything) while 5.2 relates to harvest management (seed management is incorrect, this refers to the planting seed, correct term is seed cotton, but harvest management is a better description than seed cotton management)

## **PRINCIPLE 6: DECENT WORK**

**Question 1 - p.84:**

**Which option would you go for regarding the indicator's level of prescription?**

#	Answer	Bar	%
1	Require the absence of discrimination: "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"		39%
2	Require a system to demonstrate the absence of discrimination: "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"		61%
Total			100%

**Please explain your answer:**




Name of your organization	Text Entry
Fair Labor Association	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. In criteria concerning discrimination, harassment or abuse, the existence of a grievance system is necessary. An organization cannot guarantee the non existence of discrimination but through this indicator, proper handling of cases would be ensured.
BCI China Office	The description of " the system to detect and remdiate " as the indicator will be more helpful for the farmer to make improvement.
Oregon Tilth	The better of the two options reads: "6.4.1 A system is in place to detect and re-mediate 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." Discrimination is the result of human interactions in a society dominated by white supremacy, violence, poverty and war. BCI can not require an agricultural operation to be free of discrimination because our societies are not free of it. Education and tools to resolve conflicts, promote diversity, workers rights and adequate pay will help to relieve the undercurrents of discrimination and create a healthy working environment more then a blanket - no discrimination statement.
FFPSD/GIZ Tajikistan	A system to demonstrate controls against it makes more sense to me and seems well in line with the continuous improvement methodology
Better Cotton Initiative	I'm sure there are arguments for both of these options, but on balance I believe that the first one is adequate. For the second option, we might be required to be more prescriptive in terms of what such a system actually looks like &/or is comprised of.



Shandong Nongxi Cotton Cooperatives	The first one is in line with Chinese Labor Law so that I prefer the 1st one.
BCI	I WANT the latter, but it's very difficult to audit. What constitutes a "system"? Even in the US, a large farm may have 1 employee, or 30. What's a "system" in either situation?
Cotton Australia (myBMP)	Option 1 as a policy is adequate. Suggest the following option: "workers are treated on their merits at every stage of their employment - from the recruitment and interview process through to their daily duties, promotion, training and development opportunities, and their resignation, retrenchment or redundancy". <a href="https://www.business.qld.gov.au/business/employing/employee-rights-awards-entitlements/anti-discrimination-eeo">https://www.business.qld.gov.au/business/employing/employee-rights-awards-entitlements/anti-discrimination-eeo</a>
IDH The Sustainable Trade Initiative	A system to detect is preferred - this way corrective actions are prescribed based on evidence, not just by enforcing a policy change but also be engaging and involving the participants in the change process,
Israel Cotton Board (ICB)	Demonstrate controls against it. This will be more convincing and should be required from producers
WWF	Both options are necessary, as the system will guarantee (or try to guarantee) the absence of discrimination. You need to require the absence of discrimination and to ask for a system to show compliance to the requirement. Indicator 6.4.2: It is MR for smallholders and it should be IR for MF & LF Criteria 6.5: this also includes migrant workers? if yes this should be mentioned.
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	In a PU farmers change every season, in a farm workers change within the season and every year so it is always necessary to have a system in place to detect and remediate any incidence of discrimination. An indicator merging both will be more preferable: 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 and There is a system in place to detect and remediate any incidence of discrimination

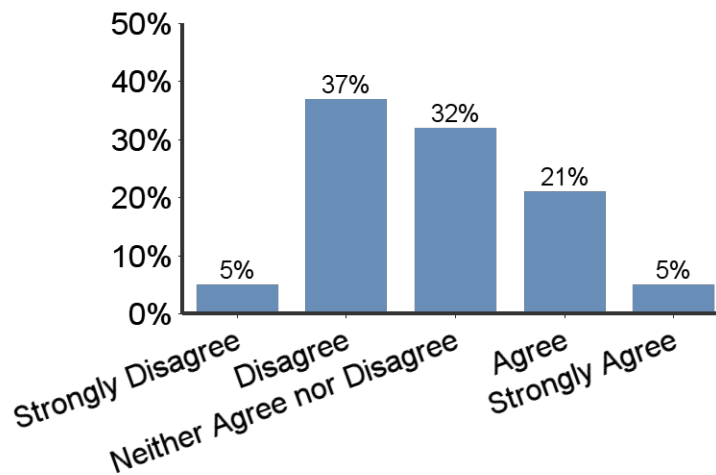
**Question 2 - p.88:**

**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?**

#	Answer	Bar	%
1	The Producer should have a policy: "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"		25%
2	The Producer should take a more proactive approach (measures are taken to facilitate the establishment...etc., based on language of ILO Recommendation 163)		19%
3	The indicator should be more of a passive indicator based on the absence of obstacles: "There is no evidence of interference with the establishment and growth of workers' organisations or their activities. "		56%
	Total		100%

**Question 3 - p.90:**

**Does it make sense to devote a criterion to freedom of association for tenants and sharecroppers (are there risks around this issue)?**

**Please explain your answer**

Fair Labor Association	Ensuring freedom of association for tenants and sharecroppers could be beneficial in some contexts, however in Turkey where I can make a more informed comment about the cotton sector, they would be the employers hiring (temporary) workers in the field. The non-existence of effective unions in the agricultural sector deems this question irrelevant in the Turkey context.
BCI China Office	BCI worker definition includes sharecroppers and tenants
WWF	if 6.5 gets in addition that "workers" include migrant workers, tenants and sharecroppers then it should be sufficient
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	it will 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. This way also we will make sure all the indicators under principle 6 includes sharecroppers and tenants
FFPSD/GIZ Tajikistan	Does not make sense. It might not be in the smallholder's sphere of influence only. Will be sufficient, to include sharecroppers and tenants into 6.5
Better Cotton Initiative	for SH these would be tough to measure and apply.
AFPRO ( Action For Food Production)	Yes , Share croppers & tenants need to be included
Better Cotton Initiative	I have not seen issues of this occurring, so am not really best placed to comment constructively
Abrapa	Co-responsibility. It is under the law in Brazil.
Shandong Nongxi Cotton Cooperatives	There could be political sensitive in China in the minority ethnic group area in Xinjiang. For the concern of the security and for the purpose to prevent potential possibility of terrorism, the local govern prohibits the gathering and meeting which is more than 50 ethnic group people.
Cotton Australia (myBMP)	It's sufficient to broaden the definition of workers to include sharecroppers and tenants.
BCI	I strongly disagree IN THE US CONTEXT. Most of the farms here grow at least some of their cotton on rented land, and the terms of their land leases are spelled out in legal contracts entered into voluntarily, in which they either pay cash rent or a portion of the proceeds from the crop itself. There is no evidence of exploitation or trouble from this arrangement to warrant such a criterion.

**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?**



#	Answer	Bar	%
1	Yes		68%
2	No		11%
3	I don't have an opinion		21%
	Total		100%

**Question 4 - p.93:**

**Which option would you go for regarding the indicator's level of prescription?**

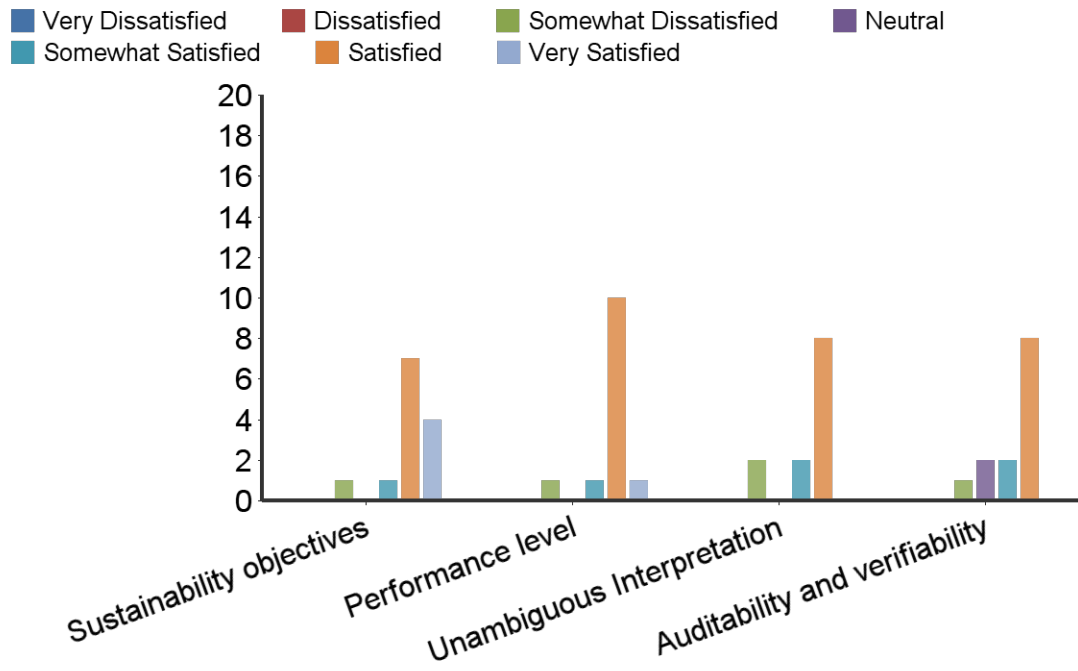
#	Answer	Bar	%
1	Option 1: "A policy guaranteeing workers the right to bargain collectively is available, and has been communicated to workers"		31%
2	Option 2: "There is no evidence of interference with the right of workers to bargain collectively".		56%
3	I don't have an opinion		13%
	Total		100%

**Option 1 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?**

#	Answer	Bar	Response	%
1	Yes		4	30.77%
2	No		9	69.23%
	Total		13	100.00%

**Please explain your answer**

Name of your organization	Text Entry
Fair Labor Association	No, I think, since the workers are supposed to be informed about their rights and other measures in the farm, they can be informed of the respective policies, it would not cause an issue in the implementation.
BCI China Office	In reality, in China we have already requested PU/LF to formulate the policy to include this criteria and communicated to farmers.
WWF	No, this is important - if nobody knows the policy how they could start to organise themselves?
Israel Cotton Board (ICB)	No obstacles for implementation.
FFPSD/GIZ Tajikistan	It might pose an obstacle on MFs, not necessarily having a lot of written policies and documentation yet following the criterion. It is always a fine line: how much documentation is needed and how much can one rely on it...The closer one is to the people, the less administrative procedures one might need and credibility can be based on direct encounter. The further away one is, the more one might want to rely on procedures, plans and documents. In case of violation of rules and criteria, especially when creating negative press, more administrative procedures and documentation requirements usually will be put in place. Big question remains: will it help to improve the situation and make the program more credible?
AFPRO (Action For Food Production)	not applicable to small holders
Better Cotton Initiative	I would prefer to see Option 2 implemented at this stage, and use monitoring to assess whether a move to Option 1 would be either necessary or required during the next standard revision.
Abrapa	In Brazil, most of times it is made during hiring and adaptation process.
Shandong Nongxi Cotton Cooperatives	No. This is in line with Chinese labor law.
Cotton Australia (myBMP)	Prefer "There is no evidence of interference with the right of workers to bargain collectively". The right to join and become involved in unions is well understood by Australian workers. Communicating a policy would create unnecessary paperwork.
BCI	In the US, the right of farm workers to bargain collectively is ensured by state laws in many (not all) states, so requiring that it be communicated to workers is redundant.

**Generally, how satisfied are you with the suggested version of Principle 6?**

**Do you have any general or specific comment or suggestion to make on Principle 6?**

Name of your organization	Comment
Fair Labor Association	<p>- ILO C.182 is only referred to in the implementation guidance. 6.1 or 6.2 may (footnote?) refer to ILO C.182 and ILO Recommendation 190, as in Turkey, one of the worst forms of child labor is defined as seasonal migratory agricultural work. Cotton farming as almost all other products employ seasonal migratory workers. - Narrative on child labor minimumage should clearly state national laws or int'l conventions - whichever is higher (p.78) - The remediation aspect is lacking from the document as a whole. What will be the rehabilitation and remediation of children once eliminated from the fields if they cannot continue schooling in that period or age? -There is a need to work on the minimum/progress requirements. SH can be included in most of the requirements if not on a minimum, then on an improvement basis. i.e. Ensuring record keeping for age verification should be at all farm levels including SH. -There are requirements for introducing policies, however if the procedures listed on the policies fails, what would be the next step? i.e 6.4.1 Grievance channel for workers and other relevant actors? - Farm level disciplinary procedures, minimum wage and other certain aspects should be the minimum criteria for SH as well. In Turkey, SH are not merely family farms, they employ temporary workers, often in the shape of seasonal migratory workers from other cities. i.e. 6.15, 6.25 6.26 should include SH in the requirements.</p>

60		<p>Question 2: This should be a more passive indicator based on the absence of obstacles. I can only speak to the US because Oregon Tilth only does third-party verifications in this country. We have a long history of union representation in agriculture, with many struggles for workers rights won and lost over the last 100 years. Under the National Labor Relations Act all workers in the US have the right to organize. Because cotton is not hand-picked in this country and only machine harvested there are fewer workers needed to harvest the cotton, as little as two workers on a single farm. We see more need for labor organizations in the tomato, grape, and strawberry sectors where hand harvesting is still used. But the same workers will be involved in all the crops and so questions about union membership might be applicable to another crop but still show that the worker has a general knowledge of their rights to fulfill the BCI criteria. Question 4: If a policy is required by the criteria it needs to be posted in a place on the farm frequented by workers and written in all the languages used, not just the national language. I am leaning toward the language for all previous indicators in this section - "There is no evidence of interference..." General comment: California labor regulations are sometimes too burdensome on growers and they have been increasingly looking to labor contractors to provide workers for planting, weed control and harvest of cotton and other crops. The Decent Work criteria needs to mention that all indicators listed herein also apply to labor contractors or subcontractors if the workers are physically working on the farm that is BCI certified.</p>
	Oregon Tilth	
	FFPSD/GIZ Tajikistan	I am not sure, I understand the usage of "The Producer" especially for criterion with indicators applicable for MFs. Is it then on the farm management or the PU managers to provide documentation on working hours, payment, contracts, etc.?
	BCI	With regard to 6.8.5 and 6.8.6, in many areas of the US, farm worker unions are not active or present. So having criteria that judge whether union members visit the farm is irrelevant. And including it in the performance scale for the SA 'punishes' growers for not achieving something that's impossible.
	Cotton Australia (myBMP)	Question 2: This should be a passive indicator i.e. the absence of obstacles. Indicator 6.8.3: I don't understand why this is a good indicator. Union membership is voluntary and a membership fee is required. Workers may choose not to belong to a union. This should be changed to "employees are not obstructed from being members of unions" Indicator 6.8.5: Suggest changing to "union representatives are allowed to visit the farm" Indicator 6.12.3 is already covered by Medicare in Australia Criteria 6.17: Word missing
	Technical Deputy, Meridian Group International, Inc./RAISE Health Initiative	<p>(preferably) include employer paid coverage for health problems discovered during that medical examination or otherwise? We are concerned that where medical benefits were already provided, the provision for an annual examination might represent a backward step. It is recommended that the benchmark detail the levels of adequacy to clearly define medical care accessible to each worker for their specific needs, including gender sensitive services. It should also be made explicit that access to family planning and reproductive health services should be part of the health benefit and that they be provided to both women and men. It should be understood and outlined in the benchmark that employers' obligations and health services extend beyond occupational health and safety. Therefore, upon detailing medical benefits in indicator 6.12.3, it is also recommended that the "Health and Safety" section make clear that services are also available for health conditions (preventative and curative) beyond problems commonly associated with occupational health and safety. That is, the employer is responsible for the health care of its workers generally and not just in relation to what the employer might deem a work-related accident or illness. B.) Provision of Education Materials Appropriate and Beneficial to Both Women and Men Workers outlined in Criteria 6.11 and 7.2 We recommend that employers be advised to provide a training program that includes provision of materials appropriate to the literacy level of the workforce, training of peer health educators, and easy access to health personnel for inquiries and treatment. Special effort should be made to ensure that each worker is aware of his/her rights and access to health services when needed. Regular trainings are recommended to refresh the memories of workers while continuously supplying information to be available and useful to new workers. This also encourages workers to practice the behavior taught to them. C.) The PP&amp;C Should Address Health Care Provider Training and Continuing Education We recommend that the Standard mention that medical staff should be trained in general as well as on gender-specific health issues and in making referrals to qualified providers, as needed. Local and national laws (or company supply chain code of conduct standards) often require that workplaces (farms or manufacturing and processing sites) have on-site health facilities staffed by health care providers. We recommend including the following indicator: "Suppliers' own facilities should meet national law regarding onsite personnel and services concerning health services and ensure these provide comprehensive health services for men's and women's health needs. Company health providers should be qualified to provide basic health care including preventive care, nutrition, hygiene, reproductive health and family planning, infectious diseases, and simple cancer screening. If qualified health providers are not on staff, the medical officer should ensure workers have access to such services, in terms of quality, proximity, and hours." D.) Expansion on Gender-Equitable Health Services and Living Arrangements As Outlined in Indicator</p>

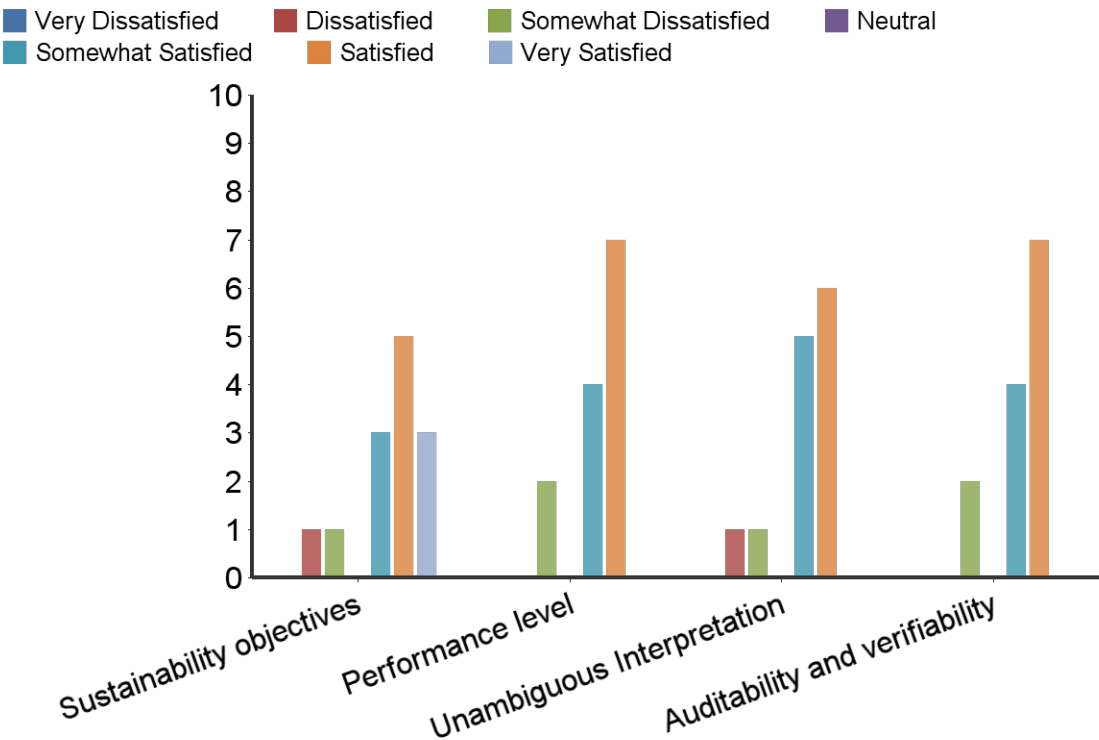




61 Cotton Australia (myBMP)	Question 2: This should be a passive indicator i.e. the absence of obstacles. Indicator 6.8.3: I don't understand why this is a good indicator. Union membership is voluntary and a membership fee is required. Workers may choose not to belong to a union. This should be changed to "employees are not obstructed from being members of unions" Indicator 6.8.5: Suggest changing to "union representatives are allowed to visit the farm" Indicator 6.12.3 is already covered by Medicare in Australia Criteria 6.17: Word missing
Technical Deputy, Meridian Group International, Inc./RAISE Health Initiative	(preferably) include employer paid coverage for health problems discovered during that medical examination or otherwise? We are concerned that where medical benefits were already provided, the provision for an annual examination might represent a backward step. It is recommended that the benchmark detail the levels of adequacy to clearly define medical care accessible to each worker for their specific needs, including gender sensitive services. It should also be made explicit that access to family planning and reproductive health services should be part of the health benefit and that they be provided to both women and men. It should be understood and outlined in the benchmark that employers' obligations and health services extend beyond occupational health and safety. Therefore, upon detailing medical benefits in indicator 6.12.3, it is also recommended that the "Health and Safety" section make clear that services are also available for health conditions (preventative and curative) beyond problems commonly associated with occupational health and safety. That is, the employer is responsible for the health care of its workers generally and not just in relation to what the employer might deem a work-related accident or illness. B.) Provision of Education Materials Appropriate and Beneficial to Both Women and Men Workers outlined in Criteria 6.11 and 7.2 We recommend that employers be advised to provide a training program that includes provision of materials appropriate to the literacy level of the workforce, training of peer health educators, and easy access to health personnel for inquiries and treatment. Special effort should be made to ensure that each worker is aware of his/her rights and access to health services when needed. Regular trainings are recommended to refresh the memories of workers while continuously supplying information to be available and useful to new workers. This also encourages workers to practice the behavior taught to them. C.) The PP&C Should Address Health Care Provider Training and Continuing Education We recommend that the Standard mention that medical staff should be trained in general as well as on gender-specific health issues and in making referrals to qualified providers, as needed. Local and national laws (or company supply chain code of conduct standards) often require that workplaces (farms or manufacturing and processing sites) have on-site health facilities staffed by health care providers. We recommend including the following indicator: "Suppliers' own facilities should meet national law regarding onsite personnel and services concerning health services and ensure these provide comprehensive health services for men's and women's health needs. Company health providers should be qualified to provide basic health care including preventive care, nutrition, hygiene, reproductive health and family planning, infectious diseases, and simple cancer screening. If qualified health providers are not on staff, the medical officer should ensure workers have access to such services, in terms of quality, proximity, and hours." D.) Expansion on Gender Equitable Health Services and Living Arrangements, As Outlined in Indicators 6.12.1 and 6.12.2 The Standard addresses health services and living arrangements for all workers, but we recommend the following details be included. The reproductive health and family planning services recommended in comment "A" above would tie into expansion on gender equitable health services. However, we also recommend the PP&C Standard discuss the specificities of living arrangements between women and men to demonstrate sensitivity to the needs of women in particular to safety and security. Below, we recommend including the following citations, which present a more holistic approach to workplace health: 1. WHO Healthy Workplace Framework and Model - This model offers a management approach to companies for addressing comprehensively the overall health needs of their workers beyond just the potential occupational health hazards and impacts of environmental damages or dust/chemicals. Employers should ensure that workers (and, ideally, their families) have timely access to services, whether they are provided at the workplace, via mobile service providers, and/or through facilitated, convenient access to local community health resources. 2. Women's Empowerment Principles (WEPs) - This set of Principles offers guidance on how to empower women in the workplace, marketplace and community. They are the result of a collaboration between the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) and the United Nations Global Compact and are adapted from the Calvert Women's Principles®. 3. WEPs Call to Action: Invest in Women's Rights to Health – This call to action encourages companies to ensure the health, including sexual and reproductive health, of all workers. Investing in women's health not only benefits employees and surrounding communities, but it can also have a positive social and economic effect on the private sector. In ensuring that workers have safe working conditions and available health services, companies establish healthier staff, better relationships, and in many cases higher Return-on-investment (ROI).
AbTF	Indicator 6.10.1: Do smallholders have to provide drinking and washing water facilities? Criteria 6.4.4 must be needed as a separate criterion, may be incorporated in 6.4.3.4.6 must be



Generally, how satisfied are you with the suggested version of Principle 6?





## ~~PRINCIPLE 7: MANAGEMENT~~

Do you have any general or specific comment or suggestion to make on Principle 7?	
Name of your organization	Comment
BCI China Office	I think more discussion is needed for Principle 7
SGS-CSTC Standards Technical Services Co., Ltd.	Proposal: The time period of keeping the training record should be clearly indicated.
Better Cotton Initiative	Personally not in favor to have it as an additional criteria
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	The indicators should be minimum (ticks in red colour) Self Assessment and internal Assessment should be integrated here. The responsibilities of PUs on implementation of CAPs and Remediation should be more detailed and more importance should be given. I also wanted to add these general comments below: • What is most important is that the final version of this document should be as simple and clear as possible. It must include enough information for implementers and eliminate most of the grey areas, provide clear guidance and adequate information to consult. The more open the criteria/indicators are to interpretation, the more risk the implementers and assurance mechanism will take. Ambiguous documentation adds a stressful element to field visits for 2PCC, as implementers already need to consider diverse local circumstances and farmers. It also causes stress to PUs if things are not clear-cut. • The Intent and Guidance sections can be improved throughout the document. The Intent section should clearly define BCI's intentions; and the Guidance section should provide a very detailed list of things for the implementer to take into consideration and not just give an over-all, general description. It is crucial that capacity-building activities go hand-in-hand with the assurance system, but please take into consideration that a given PU manager may sometimes be an accountant working for a ginner and that individual may not be capable of understanding at a single glance the complexities of, say, an integrated water-management system. • Indicators can be more detailed and direct. Also, the first indicator should direct the PU to consider specific problems in relation to the criteria within his or her local context. For example, if the criterion is fibre quality, the PU should first identify specific problems affecting the fibre quality in their own region and then work on potential solutions. The second indicator should always foster awareness-raising among farmers and workers about the specific problem and solution related to that criterion and give responsibility to PU to put a system in place to control it. • Either the Indicators or the Assurance System should place PUs in a position where they actually have to prove that they are compliant with the criteria. For example, that "there is no discrimination and there is a system in place to detect and remediate...." • We need to emphasize the importance of Corrective Action Planning and Remediation. It could be included in the 7th Principle (Management criteria)
FFPSD/GIZ Tajikistan	Although I understand the importance of management criteria for the implementation, I am not sure it makes sense to have it as 7th principle plus criteria and indicators, because the first six principles focus on farmers, farm management and workers. In the Principle 7, targeted is the Producer Unit management (only identical with farm management for LFs). This seems a little inconsistent and might create misunderstandings and confusion.
Better Cotton Initiative	When you say that a PU Manger has been trained by BCI we can add trained by BCI or organisations/trainers identified by them.
Oregon Tilth	If there is no requirement for a Continuous Improvement Plan for large farms why are we instructed to have the grower fill out the template at the verification visit (criteria 7.3)? Either give the CIP more meaning in the context of tracking the farms improvements between licensing years or do away with it for large farms. In two cases in the US, issue of a license was held up because the grower forgot to fill out the CIP template. According to this draft standard, the CIP is not a part of the minimum requirements to meet the BCI criteria, so why did the County manager and the Standards and Assurance Coordinator require it for large farm verification?
AFPRO (Action For Food Production)	One more criteria may be included in capacity building; The Producer may strengthen Farmers /LG capacity through field demonstrations The Producer must strengthen staff capacity through trainings/field visits by various local institutions /universities and KVKs The new principle is good and need to be implemented.
Better Cotton	Note: I am assuming that the question above refers to 'Principle 7' and NOT 'Principle 6' as

### Terms and definition

Is there any definition you would like to add to the Terms and Definition?



#	Answer	Bar	%
1	Yes		27%
2	No		73%
	Total		100%

If yes, which one(s)?

Name of your organization	Comment
BCI China Office	Climate change, carbon emission, land conversion
Better Cotton Initiative	Contamination: "Any foreign matter, i.e. any material in a lot of cotton other than cotton lint or trash (cotton leaf). It may be either be man-made (e.g. grease, plastic, cloth, hair, machinery parts) or natural (bark, grass, seed coat fragments)." Grass seed coat are referred to as TRASH and should come under foreign matter. Spelling of NEPS I don't think NAPS is a wordLength: "The length of the cotton fibre. As with strength, generally the longer the better. " this is not true its the question of end use in the process of spinning
Better Cotton Initiative	GM Cotton GMO Bt Cotton RoundUpReady Montreal Convention
BCI	-Change Riparian Land to Riparian Areas. - Criterion: one of numerous criteria -Re-entry period: the period after which it's OK for workers to enter field after spraying. Usually specified in on product labels. - Producer Unit (to distinguish from Production Unit) - Soil carbon - Carbon sequestration - Precision agriculture - Degraded areas: actually, I think this term should be removed from ALL our

### Guidance on chemicals

Is there anything you would like to add/remove/amend on "Guidance on chemicals" annex?

#	Answer	Bar	%
1	Yes		23%
2	No		77%
	Total		100%

If yes, please precise:

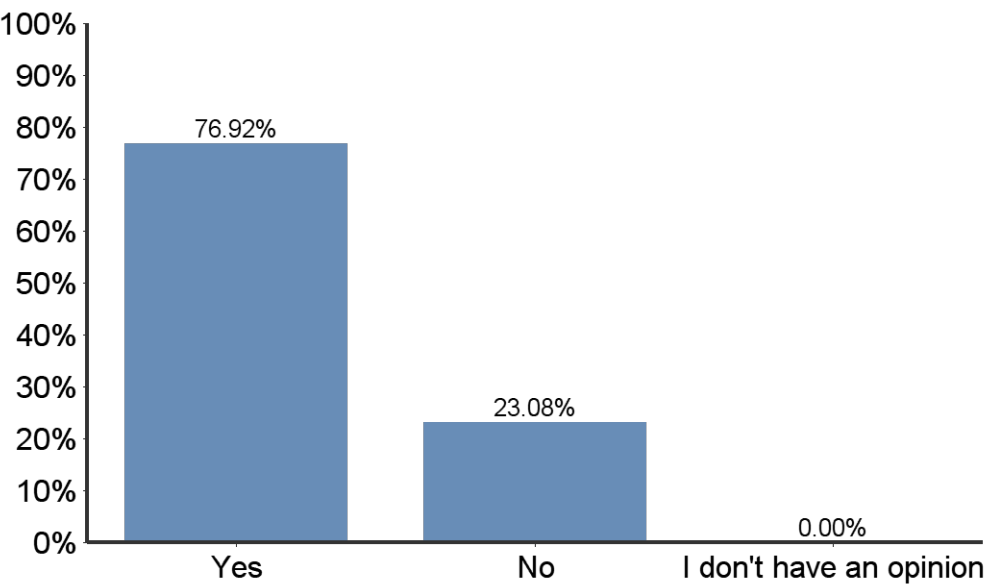
Name of your organization	Comment
Better Cotton Initiative	Details of the Montreal Convention
Abrapa	Do not imply "reducing" the use of chemicals, but use of policies and alternatives that show this intentions. In Brazil, many times this is not possible.
BCI	I think the chemicals should be organized in a table, with rows (or columns) for each convention/list. So it's easy to see where they overlap. I'd also like to see us provide resources for looking up specific materials and products.

Summary of relevant ILO conventions

Is there anything you would like to add/remove/amend on "Summary of relevant ILO convention" annex?

#	Answer	Bar	%
1	Yes	<div></div>	9%
2	No	<div></div>	91%
	Total		100%

Are you satisfied with current definition of farmer category?





**Please explain your answer**

Name of your organization	Text Entry
IPUD - İyi Pamuk Uygulamaları Derneği - Good Cotton Practices Association	There should be more emphasize on need of worker rather than size of the farm. The size of the farm should include oter farms but not just cotton.
Better Cotton Initiative	The inclusion of 'Control Groups' is not practical in many circumstances - this needs to be clarified, with clear guidance. The new 'Group Assurance Model' is not taken into consideration under '3rd Party Verification' for Large Farms.
BCI	The LF category presumes a large number of workers, but that's often not the case. A 500 ha farm in the US can be managed by 2 family members and 1 employee, in many cases.