

# Assurance Programme Planning for COVID-19

10 February 2021

This document sets out the BCI assurance programme's force majeure response to the COVID-19 pandemic. As the situation evolves, BCI will re-evaluate conditions in our countries of operation and review this document as necessary, in line with the guiding principles below.

## Guiding Principles

1. BCI and our Implementing Partners (IPs) have a responsibility to **protect the health and wellbeing of field staff and farmers/ workers as a first priority**. Any BCI assurance-related activities that would compromise the health or well-being of field staff, farmers, or workers is to be postponed or alternate strategies employed (i.e. remote checks, one-on-one farmer visits, etc)
2. BCI will endeavour – to the degree possible – to ensure that COVID-19 related restrictions do not unfairly affect the status of existing licences and the ability of existing Producers<sup>1</sup> to become re-licensed.

## Summary Approach

### **COVID-19 Planning for all impacted Producers**

1. In regions with COVID-19 travel or movement restrictions, IPs (at project level) or Large Farms will complete a '**COVID-19 Plan**'<sup>2</sup> explaining implications on routine capacity building activities, and outlining alternate approaches to be taken
  - a. These plans will be collected and approved by BCI Country Teams
  - b. IPs will be responsible for reviewing the plans periodically and updating them if the situation changes
2. BCI recognises that extensions to assurance deadlines may be required at a *Project or Large Farm Level* due to travel/movement restrictions associated with COVID-19. In these circumstances, IPs or Large Farms are to submit any extension requests via the existing variations request process. More information on this process can be found in the [Assurance Manual](#) (Section 18 'Variations and Extensions').

### **Approach for existing Producers**

1. *Producers with active licences* that are not due for an assessment in the upcoming season<sup>3</sup> will maintain their active licences with no interruption
2. *Producers with a licence expiring* in the upcoming season can receive a remote licencing assessment if an on-site assessment cannot be carried out due to COVID-19 travel or movement restrictions
  - a. Remote assessments will follow a defined procedure developed by BCI; all BCI assessors and approved third-party verifiers will be trained in this procedure

<sup>1</sup> In the context of the Better Cotton Standard System, 'Producer' refers to either a Large Farm or a Producer Unit of smallholder or medium farms

<sup>2</sup> COVID-19 plans to be completed at project level or Large Farm level; BCI has developed a standard template to be used

<sup>3</sup> Defined as 2020/21 season for southern hemisphere and 2021/22 season for northern hemisphere

- b. If existing Producers cannot comply with a Core Indicator due to COVID-19-related restrictions, *COVID-19 Compliance Exemptions* may be granted by BCI. This would give Producers additional time to implement corrective actions, and might be subject to an on-site surveillance assessment the following season. These exemptions would be applicable only if the non-conformity does not pose credibility or reputational risks to the Better Cotton Standard System.
3. In exceptional cases, Producers who cannot have a remote assessment carried out can apply for a one-year licence extension, in writing, explaining the rationale. These will be reviewed and decided by the BCI Assurance Managers based on an assessment of risks and the Producers' previous conformance history

### **Approach for new Producers**

1. New Producer Units (PUs) that apply for a variation to be assessed for licencing in the upcoming season will still require a 'Readiness Check' by the IP prior to completing the variation<sup>4</sup>
  - a. If on-site Readiness Checks are not possible due to COVID-19 related restrictions, these checks can be carried out remotely
  - b. In all cases it is still the IP's responsibility to ensure that **new PUs are fully compliant with all Core Indicators before recommending them for licencing**<sup>5</sup>
2. For new PUs and new Large Farms, if an on-site licensing assessment is not possible due to COVID-19 restrictions, they can receive a remote assessment (following a defined procedure)
  - a. If found compliant with all Core Indicators the new PU or LF would receive a BCI licence. In certain circumstances, BCI may issue a one-year conditional licence to first year licence holders.

**Note:** BCI expects in any areas where COVID-19 remains an issue, it may continue to be particularly challenging for IPs to have new PUs established and ready for licencing in 2021/22 – especially as continued travel restrictions will impact field staff recruitment and farmer training. **It is still the responsibility of IPs to ensure that new PUs are fully compliant with all Core Indicators** – as assessed through a Readiness Check – before recommending them for licencing. New PUs that are not ready for licencing can remain in set-up phase for 2021/22.

## **For questions or more information**

Contact [assurance@bettercotton.org](mailto:assurance@bettercotton.org)

<sup>4</sup> Readiness Checks and variation process are components of the revised BCI Assurance Model implemented in season 2020/21. Refer to [BCI Assurance Manual v4.1](#)

<sup>5</sup> COVID-19 related compliance exemptions will not apply to new Producer Units or Large Farms