

# BCI Ginner Monitoring Reporting Template

2020

**Organisation:**

**Monitored By:**

**Evaluation date:**

**Report date:**

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# Introduction

This reporting template to be used during ginner monitoring and audit visits for ginning factories that are buying and selling Better Cotton. It is applicable for BCI staff carrying out second-party ginner monitoring visits, and third-party verifiers carrying out ginner audits against the [Better Cotton Chain of Custody Guidelines v1.4](#).

## 1 Ginning Factory Information & Scope

Ginning Factory Name			Ginner Code/BCP Code:	
Address	Street address			
	State		Country	
Ginner contact name and role			Email/ Phone Number	

### 1.1 General Overview of the Ginning Factory

*[Include general information, including but not limited to details about conventional cotton ginning (i.e. are they ginning conventional and Better Cotton), capacity of ginning operation (e.g. number of ginning machines, approximate productivity per day, typical gin operation schedule), ginning operations this season (e.g. approximate start date, number of bales so far, percentage of bales were Better Cotton, etc.).]*

### 1.2 Scope details

Scope Item	Check all that apply to the scope of evaluation
BCI Better Cotton Platform Account Type	<input type="checkbox"/> Ginner <input type="checkbox"/> N/A – Better Cotton Platform not used
Primary activity	<i>[e.g. Ginning, Cotton Seed Oil Producer]</i>
Organisation gins conventional cotton	<input type="checkbox"/> Yes <input type="checkbox"/> No
Middlemen used	<input type="checkbox"/> Yes <input type="checkbox"/> No
CoC Model	Product segregation
Description of subcontracted activities	<input type="checkbox"/> N/A – no subcontractors
Changes since the previous evaluation	<i>[changes include but are not limited to a change in the primary contact person, a change in subcontracting activities, the addition of middlemen in the supply chain, etc.]</i>
Additional remarks	

### 1.3 Site Listing

Site Name	Primary Contact/ Address/ Tel/ Email	Site Activity
		<i>[e.g. gin, sales office]</i>

## 2 Evaluation Process

Type of evaluation	Onsite: <input type="checkbox"/> Second Party <input type="checkbox"/> Third Party <input type="checkbox"/> Other - Remote: <input type="checkbox"/> Second Party <input type="checkbox"/> Third Party <input type="checkbox"/> Other -		
Date of evaluation		Total on-site time	

Name of assessor(s)	Organisation	Role
		<i>[Lead Assessor, Team Member]</i>

## 3 Summary Outcome

- Were any Minor Non-conformities observed?     Yes     No
- Were any Major Non-conformities observed?     Yes     No
- Were any Improvement Opportunities observed?     Yes     No

Based on the outcome of the ginner audit or monitoring visit, do you recommend suspending the gin's Better Cotton Platform account?

- Yes     No    If yes, please explain reason:

Description of any complaints, disputes, or allegations of non-conformance with the guidelines raised against the Organisation since the last evaluation:

### 3.1 Summary of Non-conformities (NCs) Issued

Non-conformity No.	Chain of Custody Requirement No.	Grading	Deadline to Close NC <sup>1</sup>
		<input type="checkbox"/> Minor <input type="checkbox"/> Major	
		<input type="checkbox"/> Minor <input type="checkbox"/> Major	
		<input type="checkbox"/> Minor <input type="checkbox"/> Major	
		<input type="checkbox"/> Minor <input type="checkbox"/> Major	

**Note:** A non-conformity (NC) is graded as Minor if it is an isolated event that is limited in temporal and spatial scale, and where an effective internal management system was in place that should have prevented or detected the issue. A NC can also be graded as Minor if it does not result in a fundamental failure to achieve the objective of the relevant requirement.

A non-conformity (NC) is graded as Major if it results in, or is likely to result, in a fundamental failure to achieve the objective of the relevant requirement (either alone or in combination with other NCs). Major NCs typically continue over a period of time or are repeated or systematic in nature.

### 3.2 Non-conformities Issued During the Evaluation

NC number:	Chain of Custody Requirement number:	NC grading:	<input type="checkbox"/> Minor <input type="checkbox"/> Major	Deadline to close NC <sup>1</sup> :
<b>Description of Non-conformance:</b>				
<p><i>[Provide full details of the identified non-conformance as it relates to above-mentioned requirement(s). Include reference to specific evidence and cite any supporting evidence. If there are several points of evidence, use bullet points to organise these. It is important to have precise details, but concise language. When necessary, describe the spatial scope of non-conformances, as for example, limited to the local area or systemic through all operations.]</i></p>				

NC number:	Chain of Custody Requirement number:	NC grading:	<input type="checkbox"/> Minor <input type="checkbox"/> Major	Deadline to close NC <sup>1</sup> :
<b>Description of Non-conformance:</b>				
<p><i>[Provide full details of the identified non-conformance as it relates to above-mentioned requirement(s). Include reference to specific evidence and cite any supporting evidence. If there are several points of evidence, use bullet points to organise these. It is important to have precise details, but concise language.]</i></p>				

<sup>1</sup> Minor NCs: Ginner shall correct the NC within 6 months or before the start of the next ginning season (whichever is shorter) and provide evidence to BCI or the third-party auditor demonstrating how the issue has been addressed.

Major NCs: Ginner shall correct the NC within 30 days and provide evidence to BCI or the third-party auditor demonstrating how the issue has been addressed.

*When necessary, describe the spatial scope of non-conformances, as for example, limited to the local area or systemic through all operations.]*

<b>NC number:</b>	<b>Chain of Custody Requirement number:</b>	<b>NC grading:</b>	<input type="checkbox"/> Minor <input type="checkbox"/> Major	<b>Deadline to close NC<sup>1</sup>:</b>
<b>Description of Non-conformance:</b>				
<p><i>[Provide full details of the identified non-conformance as it relates to above-mentioned requirement(s). Include reference to specific evidence and cite any supporting evidence. If there are several points of evidence, use bullet points to organise these. It is important to have precise details, but concise language. When necessary, describe the spatial scope of non-conformances, as for example, limited to the local area or systemic through all operations.]</i></p>				

### 3.3 Improvement Opportunities

Note: Improvement Opportunities are issued for the early stages of a problem, which does not itself constitute a non-conformance, but which the auditor considers may lead to a future non-conformance if not addressed; improvement opportunities may lead to direct non-conformances if not addressed.

<b>Improvement Opportunity number:</b>	<b>Chain of Custody Requirement number:</b>	<b>Description of Observation:</b>
<b>Improvement Opportunity number:</b>	<b>Chain of Custody Requirement number:</b>	<b>Description of Observation:</b>
<b>Improvement Opportunity number:</b>	<b>Chain of Custody Requirement number:</b>	<b>Description of Observation:</b>

### 3.4 Additional Notes on Findings

### 3.5 Notes for Next Evaluation

## Chain of Custody requirements

Refer to section 2.0 of the Better Cotton Chain of Custody Guidelines v1.4

### Part I: Responsibilities, training, and record-keeping

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<p><b>2.1.1</b> The ginner shall identify a designated representative(s) who has overall responsibility for ensuring compliance with the relevant Better Cotton CoC Guidelines requirements. The representative shall also be the primary contact on the BCI ginner registration form.</p> <p><i><b>Guidance:</b> As a good practice, ginner should have access to the BCI Ginner Agreement and/or Better Cotton CoC Guidelines at each premise where they are handling Better Cotton. Ginner can also keep other documents such as training materials or user manuals on-site. The intent is to ensure staff involved in maintaining the chain of custody can always refer to the documents.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>Suggested Interview Question: Who is the designated representative for ensuring compliance with CoC Guidelines?</i></p> <p><i>Verification: Confirm through interviews and other records that the designated representative has overall responsibility and authority.</i></p> <p>This was confirmed by the following:            Interviews with:            Observation of:            Documentation review: [e.g. Ginner Registration Form, Better Cotton CoC Guidelines on file, documented CoC procedures, training records, training completion confirmation email]</p>
<p><b>2.1.2</b> The ginner shall ensure that all existing and new staff responsible for implementation of procedures are trained and competent. At minimum, the following trainings are required:</p> <ol style="list-style-type: none"> <li>a) The ginner’s designated representative(s) shall participate in training provided by BCI</li> <li>b) All staff responsible for using the BCP shall complete the BCI training on the BCP</li> </ol> <p><i><b>Guidance:</b> If new staff members take on responsibility for compliance with Better Cotton CoC requirements or using the BCP, these individuals need to be trained.</i></p> <p><i>The ginner should develop a training plan that includes all staff with responsibilities in maintaining Chain of Custody (CoC) of Better</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>Suggested Interview Questions: Who is responsible for other critical control points such as purchasing, BCP data entry, segregation, etc. How do you ensure that these individuals are trained and competent to carry out their relevant responsibilities? Do you have any training records or materials? How do you inform them about their roles? What happens if workers leave or change positions?</i></p> <p><i>Have the individuals responsible for using the BCP completed the mandatory training offered through BCI? Do you have any confirmation of this?</i></p> <p><i>Verification: Review related training evidence and interview workers to confirm training completed.</i></p>

Requirement	Grading	<b>Assessor Findings</b> <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<p><i>Cotton. The plan should specify frequency of training. Records and training resources should be maintained. Training will typically include workers responsible for recording the weight of Better Cotton received, unloading and storing Better Cotton, labelling seed and lint Better Cotton, managing the ginning process, and completing/ storing records related to the purchase, receipt, processing, and sale of Better Cotton. BCI provides bespoke trainings to ginners on the CoC Guidelines, please contact the country offices for details.</i></p>		<p>This was confirmed by the following:  Interviews with:  Observation of:  Documentation review: <i>[e.g. documented CoC procedures, training materials, training attendance log, BCI training confirmation email]</i></p>
<p><b>2.1.3</b> The ginner shall maintain the following relevant documents and records related to the purchase, handling, and sale of Better Cotton (where applicable):</p> <ul style="list-style-type: none"> <li>• Supplier list</li> <li>• Purchase slips, purchase records, or farmer pay slips</li> <li>• Gate entry pass/slip</li> <li>• Weighbridge slip (including seller information, date, time, and weight)</li> <li>• Procurement or arrival register</li> <li>• Heap registers</li> <li>• Bale register/ pressing register</li> <li>• Processing records/ confirmation of ginner outturn ratio</li> <li>• Sales invoices and contracts</li> <li>• Transport/ shipping documents</li> <li>• Records of tax paid, or excise and taxation register</li> </ul>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Minor NC  <input type="checkbox"/> Major NC</p>	<p><i>Select records reviewed during the evaluation. Identify the records that are essential to trace the purchase and sale of Better Cotton. Add additional findings here on how records are maintained.</i></p> <p><i>Note: Below is a sample list of records. It is not necessary that all records are maintained, only the ones that are essential for traceability.</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Supplier list</li> <li><input type="checkbox"/> Purchase slips, purchase records, or farmer pay slips</li> <li><input type="checkbox"/> Gate entry pass/slip</li> <li><input type="checkbox"/> Weighbridge slip (including seller information, date, time, and weight)</li> <li><input type="checkbox"/> Procurement or arrival register</li> <li><input type="checkbox"/> Heap registers</li> <li><input type="checkbox"/> Bale register/ pressing register</li> <li><input type="checkbox"/> Processing records/ confirmation of ginner outturn ratio</li> <li><input type="checkbox"/> Sales invoices and contracts</li> <li><input type="checkbox"/> Transport/ shipping documents</li> <li><input type="checkbox"/> Records of tax paid, or excise and taxation register</li> </ul>



Requirement	Grading	<b>Assessor Findings</b> <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<ul style="list-style-type: none"> <li>For outsourced gins or those using subcontractors: copy of outsourcing arrangement and subcontractor declarations</li> </ul> <p><i>Guidance: Documents can be maintained in paper form or electronic format.</i></p>		<input type="checkbox"/> For outsourced gins or those using subcontractors: copy of outsourcing arrangement and subcontractor declarations <input type="checkbox"/> Other - This was confirmed by the following: Interviews with: Observation of: Documentation review: <i>checked above</i>
<p><b>2.1.4</b> Retention times for records relevant in demonstrating the organisation's conformity with all applicable CoC requirements shall be a minimum of two (2) years or two (2) full cotton seasons, whichever is greater. The ginner shall ensure that all documents are available for review by BCI and third-party auditors upon request.</p> <p><i>Guidance: The record retention requirement extends outside of the ginner to include any subcontractors (currently active or inactive) that were used during this time.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC <input type="checkbox"/> N/A	<p><i>Suggested Interview Questions: Do you have a system to maintain all relevant documentation for a period of 2 years? How are these documents stored and in what form? Who is responsible for maintaining them? How do you ensure that documentation relates to Better Cotton transactions? How easily can they be accessed by BCI on request?</i></p> <p><i>Verification: Review documents and document storage procedures. Interview workers responsible for document storage.</i></p> <p>This was confirmed by the following:            Interviews with:            Observation of: <i>[e.g. document filing]</i>            Documentation review: <i>[e.g. documented CoC procedures]</i></p>
<p><b>2.1.5</b> The ginner shall communicate any changes in primary contact names, procurement processes, or outsourcing arrangements to BCI via email within 15 calendar days of the change occurring.</p> <p><i>Guidance: Other changes may include: gin activity or inactivity. Please contact the BCI supply chain team in your country to communicate any changes.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC <input type="checkbox"/> N/A	<p><i>Suggested Interview Questions: Have you had any recent changes in BCI contact person, your procurement processes, or outsourcing (subcontracting) arrangements? If so, did you notify BCI of these changes?</i></p> <p><i>Verification: Review records of any associated changes and communication records with BCI. Interview workers responsible.</i></p> <p>This was confirmed by the following:            Interviews with:            Observation of:</p>

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
		Documentation review: <i>[e.g. documented CoC procedures, copy of notification email to BCI]</i>

## Part II: Purchasing of Better Cotton

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<p><b>2.2.1</b> The ginner shall verify that seed cotton purchased as Better Cotton is traceable back to licensed BCI farmers.</p> <p><i>Guidance: The ginner shall demonstrate how they verify seed cotton purchased as Better Cotton and keep relevant verification records. Acceptable verification may vary in different countries, please contact the BCI supply chain team in your country for further guidance.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>Suggested Interview Questions: How can you link the Better Cotton you have bought back to licensed BCI farmers? What kind of records do you keep for this? What records do you collect from either middlemen, markets/ agents, or farmers (as applicable)?</i></p> <p><i>How do you ensure these are from licensed BCI farmers? a) Do you go back to IP/PU staff to verify? b) What kind of support is provided by them?</i></p> <p><i>Verification: The assessor should select 5-10 purchase transactions from BCP - representing at least one recent purchase, one from several months ago (if possible) and one from the previous season. Include any potential outlier transactions (e.g. much higher volumes, late season purchases, etc) in the sample size. A greater sampling rate is suggested based elevated levels of risk (i.e. supply chain complexity, high number of suppliers, etc.) Review related purchase records (including middlemen if applicable).</i></p> <p><i>If determined to be necessary for cross-checking purchase information, provide details on selection method and findings for interviews with licensed BCI farmers and/or middlemen.</i></p>

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
		<p><i>Also, note any procedures that are in place to meet country specific requirements.</i></p> <p>This was confirmed by the following: Interviews with: Observation of: Documentation review: <i>[e.g. documented CoC procedures, purchase records for sampling of transactions]</i></p>
<p><b>2.2.2</b> The ginner shall maintain accurate and complete documentation of its process for procuring Better Cotton and the flow of Better Cotton from farmers to the gin (including the role of middlemen, markets, storage, transport, etc.).</p> <p><i><b>Guidance:</b> The process for procuring Better Cotton can be presented in a wallchart at the gin or maintained in an electronic or hard copy. Staff and workers should be familiar with the wallchart/ flowchart and be able to demonstrate an understanding of the process flow. The ginner shall make this information available to BCI staff and third-party auditors.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>Suggested Interview Questions: Do you have a documented process for Better Cotton procurement? Is the process up-to-date? Who is responsible for maintaining this?</i></p> <p><i>Verification: Review evidence such as procedures or wallchart that document the process flow for procurement of Better Cotton. Interview workers responsible for implementation of procedures.</i></p> <p>This was confirmed by the following: Interviews with: Observation of: Documentation review: <i>[e.g. wallchart/ flowchart, documented CoC procedures]</i></p>
<p><b>2.2.3</b> The ginner shall keep accurate records of all purchases of Better Cotton, including name of the direct seller, purchase date, volume, and Annual Authorised Volume (AAV) code or farmer code.</p> <p><i><b>Guidance:</b> Relevant records are outlined in requirement 2.1.3. Additionally, the Annex of the BCI Ginner Agreement includes an example template which ginner may use to record purchases and sales.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>Suggested Interview Questions: What purchase records do you collect to meet this requirement?</i></p> <p><i>Verification: Confirm that all documents can be linked, appear accurate and complete, and clearly show that purchases can be tracked back to licensed BCI farmers. Verify that volumes in the BCP for aggregated transactions reconcile with all individual purchases.</i></p> <p>This was confirmed by the following: Interviews with: Observation of: <i>[e.g. associated BCP transactions]</i></p>

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
		Documentation review: <i>[e.g. documented CoC procedures, purchase register, copies of purchase records/receipts]</i>
<p><b>2.2.4</b> If the ginner purchases Better Cotton from a market or middleman (rather than a farmer), the ginner shall in addition:</p> <p>a) Maintain an up-to-date list of the names and contact information for all markets or middlemen from which Better Cotton is purchased.</p> <p>b) Ensure that all middlemen have systems in place to keep Better Cotton segregated from conventional cotton during purchase, handling, storage, transport between farm to gin and can trace Better Cotton back to licensed farmers through objective documentation such as purchase vouchers, weighbridge slips.</p> <p>c) Obtain records from each middleman of their relevant purchases from licensed BCI Farmers, including the farmer name and/or code, date of purchase, and volume.</p> <p><i><b>Guidance:</b> Gidders may also ask middlemen selling Better Cotton to sign a declaration stating that they have purchased Better Cotton only from licensed BCI farmers and that they have kept Better Cotton segregated from conventional cotton at every stage of handling. It is recommended that middlemen should issue a proof of purchase with three copies – one copy to be provided to the farmer, one kept with the middleman, and one provided to the ginner.</i></p> <p><i>Gidders can contact BCI to get a support package on how to engage with middlemen to ensure that they comply with the CoC requirements. The support package includes training approach for ginner staff, sale/purchase data keeping format, information about staff trained etc. Please contact BCI local supply chain team for further information.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC <input type="checkbox"/> N/A	<p><i>Suggested Interview Questions: Do you ever purchase Better Cotton from middlemen? What are the systems in place to keep Better Cotton and conventional cotton segregated when middlemen are involved in the supply chain?</i></p> <p><i>Verification:</i></p> <p><i>a) Collect the list of middlemen and verify information is complete. Ask when the list was last updated.</i></p> <p><i>b) Identify systems in place for segregation implemented by the middlemen. How does the gin verify effective systems in place? Describe any training provided to middlemen.</i></p> <p><i>c) Describe records the middlemen provide the gin on licensed BCI farmers and purchase receipts? Cross-check purchase records with BCP.</i></p> <p><i>Include findings from interviews with a sample of middlemen contacted to cross-check purchase records, contact information, and training (if applicable).</i></p> <p>This was confirmed by the following:  Interviews with:  Observation of:  Documentation review: <i>[e.g. documented CoC procedures, list of middlemen, purchase records, receipts, training records, middlemen declarations]</i></p>

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<p><b>2.2.5</b> The ginner shall provide receipts to farmers where Better Cotton is purchased directly from licensed BCI farmers. Receipts shall include buyer/ seller name, AAV code and/or farmer's code, village, date and quantity.</p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC <input type="checkbox"/> N/A	<p><i>Suggested Interview Questions: How do you identify BCI licensed farmers? Do you check with the IP/PU staff? When do you provide the receipt to the farmer? How do you receive the Annual Authorized Volume (AAV codes)/ License codes to enter them into the BCP?</i></p> <p><i>Verification: Collect a sample of receipts and verify information is complete and accurate.</i></p> <p>This was confirmed by the following:            Interviews with:            Observation of:            Documentation review: <i>[e.g. documented CoC procedures, sample of receipts to farmers]</i></p>

### Part III: Segregation and identification of Better Cotton

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<p><b>2.3.1</b> The ginner shall have a system in place to ensure that Better Cotton is segregated from other (conventional) cotton by physical separation and/ or temporal separation.</p> <p><i>Guidance: If the ginner handles both Better Cotton and conventional cotton, it must have systems in place to maintain segregation if both types of cotton are on site at the same time. Examples: Temporal separation – where the gin processes seed Better Cotton for a distinct period of time, e.g. two weeks. Physical</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>Suggested Interview Questions: How do you ensure Better Cotton is kept segregated? Describe how the system (physical and/or temporal separation) works at each stage of purchase, receipt, storage, ginning, transport, and handling of Better Cotton.</i></p> <p><i>Does the gin have any other storage facilities (or purchasing office) where Better Cotton might be kept?</i></p>

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<p><i>separation – where the gin segregates Better Cotton and conventional cotton bales in separate areas of the warehouse.</i></p>		<p><i>How do you ensure that all workers handling Better Cotton are aware of this system for segregation and identification?</i></p> <p><i>Verification: Interview workers involved in each control point to confirm procedures are being implemented and related training. Take a tour of the facility to verify procedures are being implemented. Review records that are used to segregate Better Cotton and conventional cotton.</i></p> <p><i>This was confirmed by the following:</i>  <i>Interviews with:</i>  <i>Observation of: [e.g. storage area, production process, facility signage]</i>  <i>Documentation review: [e.g. documented CoC procedures, inventory records, production records]</i></p>
<p><b>2.3.2</b> The ginner shall maintain visual identification of Better Cotton at every stage of purchase, storage, processing, transport, and handling.</p> <p><i><b>Guidance:</b> Better Cotton cannot be mixed with conventional cotton at any point during storage, processing, transport and handling by the gin. It is not required to clean down a gin prior to commencing ginning of Better Cotton. Identification can be done through signs, labels, tags, etc.</i></p> <p><i>For example, clearly demarcated area/ platform on which Better Cotton will be heaped or bales will be stocked. The designated areas for heaping or storage should be clearly identifiable using sign boards or labels mentioning BCI in the case of Better Cotton bales. Staff/ workers involved in physical handling of Better Cotton should be aware of the requirement of separation. The gin should have clear lay down process mentioning how they maintain segregation.</i></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Minor NC</p> <p><input type="checkbox"/> Major NC</p>	<p><i>Suggested Interview Questions: How much inventory do you currently have in the form of seed cotton and lint? How do you ensure that all workers handling Better Cotton are aware of this system for segregation and identification?</i></p> <p><i>Verification: Interview workers involved in each control point to confirm procedures are being implemented and related training. Cross-check inventory records with visually identifiable Better Cotton in storage and any recent purchases or production records.</i></p> <p><i>This was confirmed by the following:</i>  <i>Interviews with:</i>  <i>Observation of: [e.g. Better Cotton bales in segregated area, bales with Better Cotton labels]</i>  <i>Documentation review: [e.g. documented CoC procedures, inventory records, production records]</i></p>

Requirement	Grading	Assessor Findings
<p><b>2.3.3</b> The ginner shall ensure that all Better Cotton bales sold is clearly physically identifiable as Better Cotton and should be mentioned in invoices and shipping documents.</p> <p><i>Guidance: The ginner must have a system in place so that 100% Better Cotton bales can be identified as such. This can be done through lot numbers, labelling on invoices and delivery notes, and/or visual identification on the bales (such as labels or colour-coded tape). Visual identification must be attached well.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i></p> <p><i>Suggested Interview Questions: How do your buyers know that lint cotton bales are Better Cotton when they receive it? Do you mention BCI Cotton bales in the Invoice when selling to a buyer?</i></p> <p><i>Verification: Review records and interview workers responsible for ensuring bales are physically identifiable.</i></p> <p>This was confirmed by the following:  Interviews with:  Observation of: <i>[e.g. bales in inventory]</i>  Documentation review: <i>[e.g. documented CoC procedures, sales records]</i></p>

## Part IV: Use of the Better Cotton Platform (BCP)

Requirement	Grading	Assessor Findings
<p><b>2.4.1</b> BCCUs shall not be transferred unless there is a corresponding purchase / sale of physical cotton products that are linked with these BCCUs.</p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i></p> <p><i>Suggested Interview Question: How do you transfer BCCUs? When do you transfer BCCUs? Are there relevant records to show the purchase or sale of Better Cotton which has been entered into the BCP?</i></p> <p><i>Verification: Interview workers involved in use of BCP to confirm procedures are being implemented and related training. Select 5-10 sample transactions from BCP and verify it corresponds to purchase and sales records on file. This may include the sample selected as part of requirement 2.2.1. The auditor may choose to expand the sampling.</i></p>

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
		This was confirmed by the following: Interviews with: Observation of: <i>[e.g. use of BCP]</i> Documentation review: <i>[e.g. documented CoC procedures, delivery/ shipping documents, sales invoice/ contracts]</i>
<p><b>2.4.2</b> The ginner shall identify a designated representative for recording relevant data on the Better Cotton Platform (BCP). The ginner shall not give access to the BCP to other third parties under any circumstances (e.g. including Implementing Partners or consultants hired by the ginner).</p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>Suggested Interview Questions: Can you confirm who is responsible for entering data into the BCP? a) What happens if that person is ill, away or unavailable? b) How and when were these individuals trained on using the BCP?</i></p> <p><i>Verification: Interview designated representative and their back-up on procedures for use of the BCP. Confirm training has been completed.</i></p> <p>This was confirmed by the following: Interviews with: Observation of: <i>[e.g. representative's use of BCP while on-site]</i> Documentation review: <i>[e.g. documented CoC procedures, training records]</i></p>
<p><b>2.4.3</b> The ginner shall enter all purchases, lint production and sale of Better Cotton into the BCP, in a timely manner indicated as follows:</p> <ul style="list-style-type: none"> <li>• Better Cotton purchases are entered within 30 calendar days of receiving seed Better Cotton.</li> <li>• Lint productions are entered within 30 calendar days of lint Better Cotton being produced.</li> <li>• Sales of lint Better Cotton are entered within 30 calendar days of shipment date.</li> </ul> <p><b>Guidance:</b> <i>In the case of ginner who are also traders, two BCP accounts with different functionalities shall be maintained.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Minor NC <input type="checkbox"/> Major NC	<p><i>Suggested Interview Questions: Please explain the process for entering data into the BCP. a) How and when does this happen? b) How do you decide when to aggregate individual purchases or sales to enter into the BCP? d) How do you check enter transaction reference numbers and enter these into the BCP?</i></p> <p><i>Verification: For the sample of transactions selected, confirm associated timelines are met. Interview workers involved in each control point to confirm procedures are being implemented and related training.</i></p> <p>This was confirmed by the following: Interviews with: Observation of: <i>[e.g. use of BCP]</i></p>



Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<p><i>The volume of seed Better Cotton in the ginner's BCP account will remain valid until the ginner enters production of lint cotton into the BCP or BCI zeros all seed Better Cotton inventories at the end of the current cotton season. Lint cotton inventories in the BCP will remain valid until the corresponding lint quantity is claimed by or transferred to a spinner or a merchant account on the BCP or zeroed out by BCI at the end of the season.</i></p>		<p>Documentation review: <i>[e.g. documented CoC procedures, purchase records, receiving records, production records, and sales documentation]</i></p>
<p><b>2.4.4</b> Requests of transaction cancellations should be submitted within 30 calendar days of the sale being entered in the BCP.</p> <p><b>Guidance:</b> <i>Under exceptional and justified circumstances, BCI may process a cancellation request received after 30 days of the sale being entered in the BCP. A transaction entered into the BCP with a status "awaiting acknowledgement" can be withdrawn within 30 days of entering it into the BCP. Transactions with a status "acknowledged" can be cancelled within 30 days after the date of acknowledgement.</i></p> <p><i>In order to cancel a transaction with "acknowledged" status, the supplier needs to write an email to the BCI team with transaction details, copy this mail to their buyer/seller and ask the buyer/seller to provide no objection on cancellation. Only after receiving confirmation from the buyer/seller of no objection will BCI cancel the transaction.</i></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Minor NC</p> <p><input type="checkbox"/> Major NC</p> <p><input type="checkbox"/> N/A</p>	<p><i>Suggested Interview Questions: What do you do if a transaction has already been acknowledged and needs to be cancelled due to clerical error made at your end? What do you do if your buyer rejects a lot and the transaction needs to be cancelled after acknowledgement? Were any transactions cancelled in the last two years? What is your process to request a transaction cancellation?</i></p> <p><i>Verification: Interview workers involved cross-reference response and records with BCP to confirm cancellations have been processed, where applicable. Take note of the time between entering the BCP and cancellation request submission.</i></p> <p>This was confirmed by the following: Interviews with: Observation of: Documentation review: <i>[e.g. documented CoC procedures, email request for transaction cancellation]</i></p>
<p><b>2.4.5</b> The ginner shall ensure that all data entered into the BCP is genuine and can be verified against corresponding documentation (i.e. purchase receipt, invoice, production records):</p> <p>a) For each purchase of Better Cotton, the ginner shall enter the corresponding purchase date or date range, and transaction reference (such as gate pass number,</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Minor NC</p> <p><input type="checkbox"/> Major NC</p>	<p><i>Suggested Interview Questions: How do you ensure that data entered in the BCP always relates to an actual physical purchase/sale of Better Cotton? Do you carry out any checks? What do you do if you find any errors?</i></p> <p><i>Verification: Sample 5-10 purchase and sale records. Confirm information entered in the BCP matches the corresponding</i></p>

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<p>purchase vouchers/ receipts or any unique document number) into the BCP.</p> <p>b) For each sale of Better Cotton, the ginner shall enter a valid transaction reference number(s) corresponding to the contract, invoice or shipping document that corresponds to each sale entered in the BCP. If one entry in the BCP relates to multiple sales, a reference number or range must be entered for each separate sale.</p>		<p><i>documentation. Interview workers involved in each control point to confirm procedures are being implemented and related training.</i></p> <p>This was confirmed by the following: Interviews with: Observation of: Documentation review: <i>[e.g. documented CoC procedures, production records, gate pass, weigh bridge slips, sales invoice, contracts, shipping documentation]</i></p>
<p><b>2.4.6</b> If requested to provide an average ginner turnout ratio, the ginner shall ensure that this ratio (volume of lint produced for a given volume of seed cotton processed, expressed in percentage) is accurately calculated and can be verified through documentation.<sup>2</sup></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Minor NC</p> <p><input type="checkbox"/> Major NC</p> <p><input type="checkbox"/> N/A</p>	<p><i>Suggested Interview Questions: What is the average gin turnout ratio? How is this calculated?</i></p> <p><i>Verification: Review production records to verify if the gin turnout ratio as declared (i.e. as provided to BCI on gin registration forms) reflects production capacity. Interview workers involved in calculation of turnout ratio.</i></p> <p>This was confirmed by the following: Interviews with: Observation of: Documentation review: <i>[i.e. documented CoC procedures, production records, gin registration form]</i></p>

## Part V: Subcontractors

Check if section is not applicable

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<sup>2</sup> In some countries, gins are asked to declare their average gin turnout at the time of setting up an account in the Better Cotton Platform; in other cases, an average turnout ratio may be used by BCI for all gins in a given country or region. Though the GOT may vary throughout the season based on quality of raw cotton but this works on the assumption that overall throughout the season the average GOT is as declared during the beginning of the season and fixed in the BCP.

Requirement	Grading	Assessor Findings <i>[The italicized suggested interview questions and verification process are intended to be deleted during completion of the checklist. Please use 3 forms of evidence (interview, observation, document review) where possible to triangulate findings. All findings require a minimum of 2 forms of evidence.]</i>
<p><b>2.5.1</b> If the ginner subcontracts any handling of Better Cotton (excluding transportation) to a subcontractor, the ginner shall:</p> <p>a) Document the nature of the subcontracting agreement, including the name, address, and contact details of the subcontractor, and share with BCI in writing prior to outsourcing.</p> <p>b) Ensure that only the ginner (not subcontractors) have access to the Better Cotton Platform and are responsible for entering data into the system.</p> <p>c) Require all subcontractors buying, selling, or handling Better Cotton to sign a declaration agreeing to comply with relevant Better Cotton CoC requirements and to provide access to their premises and records for any BCI staff or third-party auditors.</p> <p>d) Ensure that all subcontractors are trained and competent to comply with relevant Better Cotton CoC requirements.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Minor NC</p> <p><input type="checkbox"/> Major NC</p> <p><input type="checkbox"/> N/A</p>	<p><i>Suggested Interview Questions: Do you use any subcontractors to handle or process Better Cotton (aside from transport companies)?</i></p> <p><i>a) If so, do you have a documented outsourcing agreement or contract?</i></p> <p><i>b) Do you have a signed declaration in place with subcontractors handling Better Cotton?</i></p> <p><i>c) Was there any change if the subcontracting terms and condition or change of subcontracting party?</i></p> <p><i>d) Do any subcontractors have access to the BCP? Is there a mechanism in place to prevent their access?</i></p> <p><i>e) How do you ensure that subcontractors fully understand the relevant Better Cotton Chain of Custody requirements and are competent to follow these? Do you provide any type of training and who does the training for them?</i></p> <p><i>Verification: Identify the types of subcontracted services in use. Review a sample of agreements and declarations. Review training plan, resources, and/or logs.</i></p> <p>This was confirmed by the following: Interviews with: Observation of: Documentation review: <i>[e.g. documented CoC procedures, list of subcontractors, outsourcing contracts, signed subcontractor declarations, subcontractor training materials &amp; attendance log]</i></p>

# Appendix 1: List of Interviewees

Worker names can be withheld due to confidentiality. In these cases, a short description of the role is sufficient. Interviews shall be documented as evidence in each applicable requirement finding in the report above.

Interviewee Name	Interviewee Title or Description of Role

## Appendix 2: List of Report Exhibits

The intent of this appendix is to ensure that the files referenced throughout the report can be easily identified based on their description. If there are photographs, these should be numbered below and saved separately in a compressed file folder (i.e. zip folder).

Exhibit number	Description of exhibit

## Appendix 3: Nonconformities issued in the last season

Not applicable – no previous evaluation

Not applicable – no non-conformities issued during previous evaluation

<b>NC number:</b>	<b>Chain of Custody Requirement number:</b>	<b>NC grading:</b>	<input type="checkbox"/> Minor <input type="checkbox"/> Major	<b>Deadline to close NC:</b>
<b>Description of Non-conformance:</b>				
<b>Corrective Action Plan</b>				
<b>Reason that led to the NC:</b>				
<b>Corrective actions to be implemented:</b>				
<b>Responsible person:</b>				
<b>Target date:</b>				
<b>Evidence of Corrective Action Plan Implementation</b>				
<b>Client evidence:</b>				
<b>Evaluation of evidence:</b>				
<b>NC status:</b>	<i>OPEN or CLOSED</i>			
<b>Comments (optional):</b>	<i>[Use for reference, when the status of NCs was upgraded and/or other relevant comments]</i>			