



Independent Assessments

FAQ for Retailers and Brands

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Frequently asked questions

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How frequently will my cotton fibre consumption measurements need to be assessed?

Please refer to *Measuring cotton consumption: Requirements and guidance* and *Measuring Cotton consumption: Independent Assessments - Guidance for Retailers and Brands*, since requirement and frequency are dependent on your Retailer and Brand Member size category and whether you wish to have access to certain Claims.

How do I choose an Independent Assessor?

RB Members are responsible for selecting an Independent Assessor in line with the guidance, which can be an organisation or an individual. Independent Assessors follow the requirements detailed in *Measuring cotton consumption: Independent Assessments - Guidance for Retailers and Brands*, '4. Choosing an Independent Assessor'. You may be able to use an organisation you already work with, for example for financial auditing, however the organisation or individual carrying out the Assessment will need to demonstrate independence and impartiality.

Who pays for the Independent Assessments?

RB Members are responsible for paying the fees for Independent Assessment and this should be arranged directly with the Assessor.

What does my organisation need to do in the event of a failed assessment?

RB Members that have not met the Requirements will receive an Unsuccessful Outcome for their Independent Assessment. The non-conformities should be specified in the Conformity Assessment part of the *Outcome Declaration and Conformity Assessment* document that the Assessor provides to the RB Member. A template for this document is available in the *Measuring Cotton Consumption* area of the Better Cotton website.

Where this happens, the RB Member must establish a corrective action plan (CAP), setting out the actions they will undertake to address the non-conformities raised within a timely manner, and in advance of the submission deadline of 15 January. It is therefore advisable that Independent Assessments are carried out well in advance of the annual submission deadline to ensure that there is sufficient time to resolve any non-conformities. Once An RB Member has addressed the non-

conformities to the Assessor's satisfaction, the Assessor will be able to grant them a Successful Outcome for that data time period.

RB Members who are unable to address all non-conformities shall maintain their Unsuccessful Outcome. Better Cotton will review the eligibility of RB Members to use certain claims if they receive an Unsuccessful Outcome that is not resolved by the annual submission deadline. However, it is the RB Member's responsibility to ensure that the claims they make are not misleading and do not constitute greenwashing. Better Cotton may also review the membership conditions of an RB Member who receives an Unsuccessful Outcome for two consecutive years.

Regardless of Assessment requirement and frequency for an RB Member's size category, in the event of an Unsuccessful Outcome that is unresolved by the submission deadline, the RB Member will need to commission an Independent Assessment for the following period.

The RB Member must review non-conformities raised by the Assessor and resolve the CAP within a timely manner. A subsequent Independent Assessment must be conducted the following year reviewing the actions taken against the CAP, regardless of RB Member size.

What if my organisation cannot meet the Requirements for Measuring Cotton Consumption?

These Requirements are designed to create a level playing field for RB Members, which supports a credible basis for the Better Cotton programme while not creating an unreasonable burden on RB Members.

Certain requirements may simply mean that the RB Member must wait before proceeding, e.g., to collect 12 continuous months of data (*Measuring cotton consumption: Requirements and guidance*, 'Requirement 3.f'), but otherwise do not face any barriers to meeting the Requirements.

Other requirements may require reflection on the RB Member's process for collecting, storing and analysing data. This may mean that the RB Member will need to put into place new processes or systems to address any non-conformities or risk of non-conformities. To help ensure consistency of process year on year, RB Members should create a documented protocol (a clear and documented explanation of how the records are used to calculate the cotton fibre consumption measurement).

My organisation needs to have an Independent Assessment every other year. Does the Independent Assessor have to review data from the last time we had the Independent Assessment?

Independent Assessment focuses on the most recent consecutive 12-month data period covered in the Requirements and should focus only on the 12 months that are intended to be part of the yearly submission to Better Cotton.

However, if an Unsuccessful Outcome was received for the previous year, and this outcome was maintained (due to not having made sufficient CAP actions in a timely manner), then a subsequent Independent Assessment must be conducted the following year reviewing the actions taken against the CAP, regardless of RB Member size.

My organisation is a 'Very Small RB Member' and would like to start using the On-Product Mark, do I need to commission an Independent Assessment?

Yes, in order to use the On-Product Mark or Advanced Claims, you will need to arrange an Independent Assessment and have received a Successful Outcome, in addition to meeting the other eligibility criteria set out in the [Better Cotton Claims Framework V 3.0](#). This must be completed before your Claims launch. To maintain access to these Claim types, you will then need to maintain the re-assessment frequency suitable for your organisation as specified in Table 7.1 in *Measuring cotton consumption: Independent Assessment: Guidance for Retailers and Brands*.

In the meantime, you will still be able to benefit from using Basic Claims and Storytelling Claims, the approval process for these Claims types has not changed.