

General Certification Requirements for Certification Bodies

Version history

Version number	Date	Comments
1	February 2025	Documents published
1.1	August 2025	Update to include Accreditation Body Requirements
1.2	February 2026	Update to include comments from BCI staff

Overview of changes

- ✓ **All:** - Reformatted the entire document following the new BCI branding guidelines, to align with the organisational re-branding,
- ✓ **Version history:** Version was updated from version 1.1 to 1.2.
- ✓ **Section 2:** - Out dated links were updated
- ✓ Changed all 'Better Cotton' into 'BCI', To align with the organisational re-branding,
- ✓ **Clause 4.4.1**, How CBs manage data, to clarify expectations to CBs.
- ✓ **Clause 4.4.2**. How BCI shares data and documents, to clarify what data is shared with whom.
- ✓ **Clause 14.7.1.7** Confirms that Children (anyone under 18) shall never knowingly be interviewed unless as specified in the P&C Monitoring and Certification Requirements.
- ✓ **Clause 14.3.2:** - added that CBs need to consider feedback from BCI Open-Source Intelligence (OSINT).
- ✓ **Clause 14.3.3.:** - BCI now reserves the right to carry out short notice audits. Applicant can be informed at least 48 hrs before but not more than 3 working days.
- ✓ **Combined section 6 on impartiality and 7 on impartiality committee** to create one section on impartiality. Hence the following section numbers were adjusted accordingly.

Contents

General Certification Requirements for Certification Bodies	1
Version history	1
Overview of changes	1
Section 1: General Requirements for Certification Bodies	4
1. Scope	4
2. Normative and Guidance Documents	4
3. CB Application, Approval, Training & Monitoring	5
4. Management Structures	10
5. Use of Certificates and BCI Certification Claims	12
6. Impartiality	12
7. Non-discrimination	14
8. Confidentiality	14
9. Publicly Available Information	16
10. Resources and Competency	16
11. Registration of Auditors	18
12. Performance Monitoring and Feedback	19
Section 2: Certification Procedures	21
13. Applications for Certification	21
14. Audit Processes	24
15. Review and Certification Decision	28
16. Closing of Non-Conformities	30
17. Surveillance	31
18. Changes to Certification	31

19. Transfer of Certificates	34
20. Complaints and Appeals	34
21. Accreditation Body Requirements	35
22. Application for accreditation to ISO 17065 for BCI scope	36
23. Initial assessment of certification bodies with existing ISO 17065 accreditation to include BCI scope	37
24. Initial assessment of certification bodies with existing ISO 17065 accreditation for BCI scope (no other ISO 17065 accreditation)	37
25. Ongoing assessment of certification bodies with existing ISO 17065 accreditation for BCI scope	38

Annex 1: BCI Lead Auditor Competency Requirements 40

Section 1: General Requirements for Certification Bodies

1. Scope

1.1 This General Certification Requirements document defines the obligations, expectations, and operational responsibilities for Certification Bodies (CB) undertaking Better Cotton Initiative (BCI) certification activities, including:

1.1.1 Producer level: Certification of Producers (Farms, Groups of Farms, or Producer Units) against the BCI Principles & Criteria.

1.1.2 Supply Chain level: Certification of ginners, traders, suppliers/ manufacturers or other supply chain entities and brands against the BCI Chain of Custody Standard and, where applicable, the Claims Framework.

1.2 Throughout this GCR document, any reference to certification processes and decisions, where relevant, also includes processes and decisions for permission to trade.

1.3 Any terms not otherwise defined in this Agreement shall have the meanings set forth in the Agreement for Certification Bodies.

2. Normative and Guidance Documents

Document name	Type	Location
BCI Principles and Criteria	Normative	BCI Website
BCI Chain of Custody Standard	Normative	BCI Website
Principle and Criteria Monitoring and Certification Requirements	Normative	BCI Website
Chain of Custody Monitoring and Certification Requirements	Normative	BCI Website
BCI Claims Framework	Guidance	BCI Website
Producer level audit report template	Template	
Chain of Custody audit report template	Template	
Key terms and definitions	Reference	BCI Website
ISO 17065	Guidance	Purchasable through ISO

3. CB Application, Approval, Training & Monitoring

3.1 Accreditation and Application

3.1.1 The CB shall be accredited to ISO 17065 or have an active application for accreditation, for the relevant BCI standard(s) for which it will provide services,

3.1.2 Accreditation shall be from an Accreditation Body that is a member of the International Accreditation Forum (IAF) and a signatory of the IAF Multilateral Recognition Agreement.

3.1.3 The CB shall adhere to the requirements of ISO/IEC 17065:2012 for bodies certifying products, processes and services.

3.1.4 The CB may carry out Services while they have an active application for ISO 17065 accreditation status for a maximum of 12 months. After this time, they must be fully accredited to ISO 17065.

3.1.5 The CB shall have a signed agreement, **be trained and** approved with BCI before promoting or carrying out any certification activities for BCI.

3.1.6 Under its agreement with BCI, the CB shall only perform work within the scope of their BCI application.

3.1.7 The CB shall submit a completed application form to BCI, using the method determined by BCI.

3.2 BCI Rights

3.2.1 BCI shall review the completed application form and carry out a due diligence review on the CB's application.

3.2.1.1 The review shall include, but is not limited to:

3.2.1.1.1 Confirming that the CB is a legal entity and have the authority to operate in the geographies specified in their application;

3.2.1.1.2 Review of the CB organisation and auditor's experience;

3.2.1.1.3 BCI may request additional information or outline additional conditions that must be met before the CB can be approved.

3.2.2 BCI reserves the right to reject an application by a CB, or to request a set of reasonable and appropriate actions for the CB to fulfil before approving.

3.2.3 BCI shall accept or reject the application once the application is reviewed, and all conditions have been met and provide this decision in writing to the CB. This will be done within 3 months.

3.2.4 BCI also reserves the right to set a period of time before an unsuccessful CB can re-apply.

3.3 Post Application

3.3.1 Once the application is accepted, the CB shall complete the following additional steps:

3.3.1.1 Sign the Agreement for Certification Bodies and any other relevant legal agreement with BCI (as required) for the provision of certification services;

3.3.1.2 Demonstrate that all proposed lead auditors meet the minimum qualification requirements [refer to [Annex 1](#)];

3.3.1.3 Ensure that all lead auditors have completed any required trainings, which will be outlined by BCI;

3.3.1.4 Ensure backgrounds checks such as criminal record and reference checks have been conducted and passed on all auditors and audit team members;

3.3.1.5 Ensure that all auditors have signed a code of conduct. If the CB does not have a code of conduct document, auditors shall sign the [BCI Code of Conduct](#).

3.3.2 BCI shall review the information referenced above, confirm the training and grant the CB full written approval to allow the CB to begin carrying out audits and certification processes.

3.3.3 BCI shall list the CB on the BCI website as an approved Certification Body with details on their scope, geographies covered and contact details.

3.4 Ongoing Monitoring of CB performance by BCI

3.4.1 BCI shall monitor CB and auditor performance through ongoing activities (as further detailed in the Agreement for Certification Bodies), including, but not limited to:

3.4.1.1 Feedback surveys completed by assessed organisations.

3.4.1.2 Review of draft and completed Audit Reports.

3.4.1.3 Periodic shadow audits.

3.4.1.3.1 BCI shall provide written feedback after the audit to inform continuous improvement of the CB.

3.4.1.4 Periodic office audits. This may include a visit to a sub-office or critical location.

3.4.1.5 Additional ad-hoc information requests regarding audit and certification procedures.

3.4.2 Where necessary and in accordance with section 3.5, BCI may issue a Performance Review. BCI shall issue a formal communication to the CB if a decision is made to place a CB on Performance Review.

3.4.2.1 Performance Reviews require CBs to conduct a root cause analysis of issues and submit a corrective action plan to address the issues to BCI.

3.4.2.2 BCI will review the submission and may provide feedback or approve the corrective action plan. If BCI suggests additional actions, the CB must include these in their corrective action plan.

3.4.2.3 The CB must implement corrective actions within a time frame specified by BCI. Failure to implement corrective actions may lead to the suspension of the CB.

3.4.3 BCI staff may shadow auditors as often as necessary to ensure implementation of the corrective actions.

3.4.3.1 In the event that the proposed corrective actions in the Performance Review are not approved, or implementation of approved corrective actions are not demonstrated within the specified timeline, BCI reserves the right to terminate the relationship with the CB according to the seriousness of the omission and after hearing the CB.

3.4.4 BCI shall share information from monitoring activities with Accreditation Bodies.

3.5 Performance reviews, Suspension and Termination

3.5.1 BCI may initiate a Performance Review, suspend or terminate the relationship with the CB based upon one or more of the following criteria, without prejudice to, and in addition, to any rights granted in the Agreement for Certification Bodies signed between BCI and the CB:

3.5.1.1 Failure to meet defined requirements for BCI certification activities (such as auditor competency requirements or other requirements in this GCR document);

3.5.1.2 Poor Audit Report quality;

3.5.1.3 Certification decision making which does not align with BCI's normative documents;

3.5.1.4 Failure to effectively follow appeals and or complaints processes when necessary;

3.5.1.5 Persistent delays in submitting Audit Reports to BCI;

- 3.5.1.6 Persistent delays in making certification decisions;
- 3.5.1.7 Poor quality of audits in practice or unprofessional or inappropriate conduct, as assessed by BCI or designated external consultants during shadowed audits or from auditee feedback;
- 3.5.1.8 Lack of responsiveness and commitment to BCI feedback and processes;
- 3.5.1.9 Changes in the status of the CB's business relationship with BCI;
- 3.5.1.10 Changes in the status of the CB's contractual relationship with BCI;
- 3.5.1.11 Failure to comply with the terms of the contract or agreement between BCI and the CB;
- 3.5.1.12 Failure to report conflicts of interest and/or not adhering to the BCI anti-bribery policy;
- 3.5.1.13 Failure to implement corrective actions following a Performance Review;
- 3.5.1.14 Failure to comply with safeguarding requirements, outlined in section 4.

3.5.2 In addition to the terms for termination in the Agreement for Certification Bodies, BCI may terminate the relationship because one or more of the requirements in 3.5.1 are met, in this event BCI shall:

- 3.5.2.1 First issue a letter to the CB outlining the reasons for intending to terminate the relationship;
- 3.5.2.2 The CB shall then have a period of 10 working days to respond;
- 3.5.2.3 If the CB does not respond within 10 days or does not provide any new information which alters BCI's view, BCI shall proceed to terminate the relationship and inform the CB in writing.

3.5.3 BCI shall issue communication writing to the CB if a decision is made to terminate the relationship based upon the above criteria.

3.5.4 If the relationship is terminated, the CB:

- 3.5.4.1 Shall notify all clients in writing within 10 working days of the termination;
- 3.5.4.2 Cooperate with any reasonable requests with sharing certification data and information;
- 3.5.4.3 Follow the process in [Section 3.6](#) on transferring clients;
- 3.5.4.4 Remove all BCI logos or references to BCI in use from publications or other promotional materials.

3.5.5 The CB may have their approval suspended, for example due to lack of availability of qualified auditors or on-going delays in meeting requirements.

3.5.6 BCI shall inform the CB in writing outlining the reasons for suspensions, the duration of suspension and corrective actions needed. After suspension :

3.5.6.1 The CB shall notify all clients in writing within 10 working days of the suspension.

3.5.6.2 During the suspension, the CB shall continue to conduct surveillance and renewal audits necessary to maintain existing certification and shall continue to address open nonconformities.

3.5.7 During the suspension, the CB shall not:

3.5.7.1 Issue any new Certificates;

3.5.7.2 Issue any new scope extension;

3.5.7.3 Enter into any new agreements for certification.

3.5.8 The CB shall cooperate with all necessary and data protection regulation compliant data sharing with BCI and the Certification Applicant.

3.5.9 Following suspension, the CB has a period of 10 days to appeal the decision of suspension in writing by emailing compliance@bettercotton.org. BCI shall review any information provided and respond to the CB within 20 working days.

3.5.10 When exercising these rights, BCI ensures the independence and impartiality of the CB's operation. Performance Reviews, terminations or suspensions shall solely base on objective and substantiated reasons.

3.5.11 BCI shall share feedback with the respective Accreditation Body.

3.6 Changes in CB Accreditation or Approval and Transfer of Certificates

3.6.1 If a CB's ISO 17065 accreditation (or part of their scope) is suspended, terminated or withdrawn by the Accreditation Body:

3.6.1.1 The CB shall notify BCI in writing within 10 working days in order to agree on next steps;

3.6.1.2 Once an agreement has been reached between the CB and BCI, the CB shall notify all certificate holders in writing within 10 working days of the suspension or withdrawal, explaining the changes and any impacts on the Certificates;

3.6.1.3 The CB shall only carry out Services as permitted by the Accreditation Body under the terms of suspension or withdrawal;

3.6.1.4 The CB may continue to work with existing certified clients to ensure the client's Certificate validity is maintained;

3.6.1.5 The validity of Certificates issued by the CB prior to the date of withdrawal are not affected, unless specified by the BCI or the Accreditation Body.

3.6.2 In the case of termination or voluntary withdrawal of accreditation, the CB shall communicate to certificate holders within 10 working days of the termination or voluntary withdrawal, specifying that they must transfer their Certificate to another approved CB within either 6 months or date of the Certificate expiry, whichever is sooner. For more information, refer to section 20 on transfer of certificates.

4. Management Structures

The CB shall fully comply with ISO/IEC 17065:2012 – Conformity Audit – Requirements for certification bodies certifying products, processes and services.

4.1 Legal and Financial

4.1.1 The CB shall be a legal entity, or a defined part of a legal entity, such that the legal entity can be held legally responsible for all its certification activities.

4.1.2 The CB shall be responsible for meeting national or other legal requirements in the countries where it operates and shall meet these requirements. This includes, but is not limited to:

4.1.2.1 Ensuring all employees are paid at least minimum wage in the location where the employees reside;

4.1.2.2 The CB shall not use bonded or child labour.

4.1.3 The CB shall document its organisational structure, showing duties, responsibilities and authorities of management and other certification personnel and any committees. When the CB is a defined part of a legal entity, the structure shall include the line of authority and the relationship to other parts within the same legal entity.

4.2 BCI Scheme Operational Responsibilities

4.2.1 The CB shall appoint a designated representative to manage overall communication with BCI.

4.2.1.1 Additional representatives can be appointed to manage operational communication for Producers and Chain of Custody Certification if appropriate.

4.2.1.2 The CB shall notify BCI within 5 working days if there are any changes in designated representatives, relevant personnel, its organizational structure, ownership, accreditation status and legal registration. Failure to do so may result in a suspension of operations as mentioned in [Section 3.5](#) of these General Certification Requirements.

4.2.2 The CB shall have a documented management system to cover activities associated with the BCI certification. This shall include as a minimum:

4.2.2.1 An annual internal audit and corrective action process for any findings identified. Any findings related to BCI from the internal audit shall be shared with BCI upon request;

4.2.2.2 Procedures for controlling documents and records associated with BCI certification activities;

4.2.2.3 Using documentation and systems as required by BCI when carrying out Services.

4.3 Safeguarding and Whistleblowing

4.3.1 The CB shall have a publicly available safeguarding policy and whistleblowing policy, the necessary associated documents, processes and reporting structures in line with best practise.

4.3.2 The CB shall report any safeguarding incidents that are related to BCI or could implicate or impact BCI within 48 hours to safeguarding@bettercotton.org.

4.3.3 Where appropriate, the CB shall share information on whistleblowing incidents with BCI by emailing whistleblowing@bettercotton.org.

4.3.4 The CB shall cooperate with BCI on any reported safeguarding incidents.

4.4 Data Management

4.4.1 CBs shall retain data in line with CB internal policies and applicable laws and regulations.

4.4.2 BCI shall maintain a list of documents and data sets and with whom they are shared.

5. Use of Certificates and BCI Certification Claims

5.1 Under the Agreement for Certification Bodies, the CB is responsible for ensuring that all licenses, certificates, marks of conformity, and any other mechanisms for indicating a product is certified, are used correctly by the licence holders

5.2 Incorrect references to BCI, or non-compliant, illegal, incorrect or misleading use of licenses, certificates, marks, or any other mechanism for indicating a product is certified, found documentation or other publicity of the Certification Applicant, shall be documented by the CB.

5.3 The CB may initiate suitable measures to remedy any non-compliant, illegal, incorrect or misleading use of licenses, certificates, marks of conformity, and any other mechanisms for indicating a product is certified.

6. Impartiality

This section emphasizes the fundamental requirement that certification must be conducted impartially, without influence from financial, commercial, or personal interests.

6.1 Commitment and risk management

6.1.1 The CB shall be responsible to ensure that the Services related to the BCI standards are undertaken impartially and are not influenced by commercial and financial interests or other pressures.

6.1.2 The CB shall have a written top management commitment to impartiality.

6.1.3 All CB personnel (including sub-contractors) shall act impartially.

6.1.4 The CB shall identify and document risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, from its relationships, or from the relationships of its personnel. However, such relationships may not necessarily present a CB with a risk to impartiality.

6.1.5 If a risk to impartiality is identified, the CB shall be able to demonstrate how it eliminates or minimizes such risk. This information shall be made available to the mechanism the CB has in place for safeguarding impartiality.

6.1.6 The CB shall require that personnel involved in any part of an audit (including reviews) declare any potential conflicts of interest prior to the audit.

6.1.7 Where BCI assign the CB to an audit, the CB shall inform BCI if any risks to impartiality are identified. If a CB identifies a conflict of interest, or perceived conflict of interest, the CB shall complete the BCI Conflict of Interest Declaration which is available on the BCI [website](mailto:compliance@bettercotton.org) and send it to compliance@bettercotton.org.

6.2 Affiliate legal entities

6.2.1 The CB and any affiliate under the same legal entity shall not:

6.2.1.1 Produce, trade, manufacturer or otherwise handle cotton from BCI certified Producers or Suppliers;

6.2.1.2 Offer or provide consultancy relating to BCI certification to clients, including any evaluation or internal auditing of management systems.

6.2.3 The CB shall ensure that activities of other legal entities with which the CB are affiliated or the legal entity of which it forms a part has relationships, do not compromise the impartiality of its Services.

6.2.4 Where the separate legal entity is involved with producing/ handling cotton from BCI certified Producers or Suppliers; or which provide consultancy services to certification clients, the CB shall ensure that:

6.2.4.1 The management staff from the separate legal entity shall be separate and shall not be involved in the management of the CB, review of audits, or certification decisions;

6.2.4.2 The CB's activities shall not be marketed or offered as linked with the activities of an organisation that provides consultancy, implying that entry to the programme would be easier, faster or less expensive if a specified consultancy organisation were used;

6.2.4.3 Personnel who have provided consultancy shall not be used to review or make a certification decision for that product/ client for a minimum of 2 years.

6.3 Impartiality Committee

6.3.1 The CB shall have an impartiality committee for safeguarding its impartiality. The committee shall provide input on the following:

6.3.1.1 The policies, procedures relating to the impartiality of its Services.

6.3.1.2 Any tendency on the part of a CB to allow commercial or other considerations to prevent the consistent impartial provision of the Services.

6.3.1.3 Matters affecting impartiality and confidence in certification.

6.3.2 The impartiality committee shall be formally documented to ensure the following:

6.3.2.1 A balanced representation of interested parties, such that no single interest predominates (internal or external personnel of the CB are considered to be a single interest, and shall not predominate);

6.3.2.2 Access to all the information necessary to enable it to fulfil all its functions.

6.3.3 If top management of the CB does not follow the input of the impartiality committee, the committee may take independent action (e.g. informing BCI, informing authorities, accreditation bodies, stakeholders), respecting confidentiality.

6.3.4 Input from the impartiality committee that is in conflict with the operating procedures of the CB or other mandatory requirements should not be followed. Management should document the reasoning behind the decision to not follow the input and maintain the document for review by appropriate personnel.

6.3.5 Although every interest cannot be represented in the impartiality committee, a CB shall identify and invite significantly interested parties.

7. Non-discrimination

7.1 The CB shall ensure that the policies and procedures under which it operates and the administration of them, shall be non-discriminatory. Procedures shall not be used to impede or inhibit access by Certification Applicants, other than as provided for in ISO 17065.

7.2 The CB shall make its Services accessible to any Certification Applicant within the CB's scope of its operations.

7.3 Accessibility to the certification process shall not be affected by factors such as the Certification Applicant's size, membership, affiliation, nor shall certification be conditional upon the number of Certificates already issued. There shall not be undue financial or other conditions.

7.4 If a Certification Applicant's application for certification is declined, this is based on a clearly evidenced rationale such as evidence of illegal activities or history of repeated non-conformities.

7.5 The CB shall confine its requirements, evaluation, review, decision and surveillance (if any) to those matters specifically related to the scope of certification.

8. Confidentiality

8.1 This Section sets out the main confidentiality obligations of the CB regarding Certification Applicant Confidential Information, while Section 7 in the Agreement for Certification Bodies governs the confidentiality obligations arising from the relationship between BCI and the CB.

8.2 The CB will maintain the confidentiality of all Certification Process Confidential Information and to use it solely for the purpose of performing its Services.

8.3 The CB will not disclose any Certification Applicant Confidential Information to any third party without the prior written consent of the Certification Applicant, except for uses stipulated in this GCR, by the Agreement for Certification Bodies or other Normative Documents (as listed in Section 2 of this GCR); or when specifically requested by BCI.

8.4 The CB shall be responsible, through legally enforceable agreements, for the management of all information obtained or created during the performance of the Services. The CB shall have systems to ensure the confidentiality of any information obtained during the audits except regarding the sharing of required information with BCI and the CB shall take all reasonable measures to protect the Certification Applicant's Confidential Information from unauthorized access, use, or disclosure.

8.5 The CB shall be responsible for the compliance by its personnel, including any committee members, personnel of external bodies, or personnel acting on the CB's behalf, with these confidentiality obligations, and shall limit the access to certification applicant confidential Information to those who need to know such information for the purpose of performing the services.

8.6 The confidentiality obligations set forth herein shall not apply to information that:

- 8.6.1 is or becomes publicly available through no fault of the CB;
- 8.6.2 is already in the possession of the CB without an obligation of confidentiality prior obtaining the information during the Services;
- 8.6.3 is independently developed by the CB without the use or reference to Certification Applicant Confidential Information;
- 8.6.4 is disclosed with the prior written consent of the Certification Applicant;
- 8.6.5 is required to be disclosed by law or a valid court order, but only to the extent necessary to comply with such requirement, provided that the CB shall, to the extent it is legally allowed to do so, promptly inform BCI and the Certification Applicant of any such order or action;
- 8.6.6 is lawfully obtained from a party other than the Certification Applicant or BCI not bound by the confidentiality obligations.

8.7 The CB shall share any information associated with the Services, unless prohibited by law, with BCI upon request. The CB shall ensure that it has the necessary rights and permissions to share Confidential Information about the Certification Applicant with BCI.

8.8 The confidentiality obligations in regard to the Certification Applicant Confidential Information that set forth in this Section shall survive five years post termination or expiration of the Agreement for Certification Bodies.

9. Publicly Available Information

9.1 The CB shall have documented procedures and make available to third parties upon request, the following:

- 9.1.1 Information about BCI certification, including procedures for granting, maintaining, extending, reducing, denying, suspending, withdrawing or refusing certification;
- 9.1.2 A description of the means by which the CB obtains financial support and general information on fees charged for BCI certification to Certification Applicants and how these are calculated;
- 9.1.3 A description of the rights and expectations for Certification Applicants, including any restrictions on use of the CBs name and certification mark, and communications about certification status;
- 9.1.4 Information about procedures for handling complaints and appeals.

10. Resources and Competency

10.1 The CB shall employ, or have access to a sufficient number of personnel to cover its operations related to the BCI certification and associated Normative Documents.

10.2 The CB shall, as a minimum, have employees or contractors with the following roles:

- 10.2.1 Lead auditor - leads audit and audit team;
- 10.2.2 Audit team members, including technical experts where appropriate - support lead auditor;
- 10.2.3 Technical reviewer - completes review of Audit Reports and calibrates grading (can be same as certification decision maker);
- 10.2.4 Certification decision maker - makes certification decision (can be same as technical reviewer for report).

10.3 The personnel shall be competent for the functions they perform, including making required technical judgments, defining policies and implementing them.

10.4 The CB shall ensure that, as a minimum, one person in the audit team is able to communicate competently in English.

10.5 For Producer level audits, the CB shall ensure the audit team has sufficient gender diversity and social auditing competence so the CB can operate effectively, for example in contexts with significant numbers of women workers.

10.6 The CB shall establish, implement and maintain a procedure for management of competencies of personnel involved in the certification process. The procedure shall require the CB to:

- 10.6.1 Determine the criteria for the competence of personnel for each function in the certification process;
- 10.6.2 Ensure the lead auditor meet the requirements set out in [Annex 1](#) of this GCR document;
- 10.6.3 Identify training needs and provide, as necessary, training programmes on certification processes, requirements, methodologies, activities and other relevant BCI requirements;
- 10.6.4 Demonstrate that the personnel have the required competencies for the duties and responsibilities they undertake;
- 10.6.5 Formally authorise personnel for functions in the certification process;
- 10.6.6 Monitor the performance of the personnel;
- 10.6.7 Implement calibration activities that support consistent interpretation of the Standard(s) by auditors and assurance personnel, including sub contractors.

10.7 When a CB performs evaluation Services, either with its internal resources or with other resources under its direct control, it shall meet the applicable requirements of ISO17065 and as specified by the BCI certification scheme. The impartiality requirements of the evaluation personnel shall always apply.

10.8 The CB shall outsource evaluation activities only to bodies that meet the applicable requirements of ISO 17065 and as specified by the BCI certification scheme. The impartiality requirements of the evaluation shall always apply and the CB is responsible for respective safeguards.

10.9 Lead auditors and technical reviewers shall:

- 10.9.1 Complete mandatory training on BCI Standards and procedures;
- 10.9.2 Pass the relevant qualifying exam issued by BCI for the relevant scope of certification.

10.10 A qualified lead auditor shall lead and supervise any audit activity, with other audit team members effectively being supervised by the lead auditor. The lead auditor must meet all the requirements stated in [Annex 1](#).

10.11 **For Producer Level:** The CB shall ensure that a new lead auditor in their first audit as lead auditor are shadowed by BCI. Any competency concerns shall be addressed and documented before the new lead auditor can be fully approved to lead audits independently.

11. Registration of Auditors

11.1 The CB shall in compliance with applicable data protection and employment law maintain the following records on the personnel involved in the BCI certification process:

- 11.1.1 Name and address;
- 11.1.2 Employer(s) and position held;
- 11.1.3 Educational qualification and professional status.
- 11.1.4 Experience and training.
- 11.1.5 The audit of competence.
- 11.1.6 Performance monitoring.
- 11.1.7 Authorizations held within the CB;
- 11.1.8 Date of most recent updating of each record.

11.3 The CB shall register all individual auditors (including lead auditors) with BCI before they carry out audit activities.

11.4 To register new auditors, CBs shall provide BCI with written confirmation that all minimum auditor qualification and training requirements have been met.

11.5 Once the required information is received, BCI will confirm registration of the proposed auditors in writing and will maintain an updated list of registered auditors under each CB (Registered Auditor List).

11.6 Personnel engaged in audits or BCI certification activities shall complete all mandatory ongoing training sessions as communicated by BCI.

11.7 BCI may at its own discretion request to review specific audit reports (for example, from new auditors).

11.8 BCI has the right to remove individual auditors from their Registered Auditor List, for example due to performance concerns or misconduct.

- 11.8.1 In these cases, BCI shall inform the CB in writing of the removal;
- 11.8.2 The CB shall discuss any corrective actions with BCI;
- 11.8.3 The removed individuals shall not carry out any audits or related activities until they are re-registered on the Registered Auditor List with BCI.

12. Performance Monitoring and Feedback

12.1 Response to feedback by the CB

12.1.1 The CB shall review and take actions to address any concerns about auditor competency which may be identified and shared in writing by BCI (for example, on the basis of client feedback surveys, report reviews, or other monitoring activities).

12.1.2 The CB shall allow BCI and BCI strategic partner staff or external consultants, to shadow audits on an announced or unannounced basis, and the CB shall facilitate the shadow process, in accordance with the integrity procedure.

12.1.2.1 In case of an announced shadow audit, BCI will inform the CB of its intention to shadow an audit at least 15 working days prior to the audit. If the CB has a reason that is not appropriate for BCI to shadow an audit, the CB should inform BCI of this within 3 working days of the request from BCI.

12.2 Outsourcing of Resources & Certification Activities

12.2.1 Where audit activities are outsourced, the CB shall ensure that the audit activities are managed in a manner which provides confidence in the results, and that records are available to justify the confidence.

12.2.2 The CB shall have a legally binding contract with the body that provides the outsourced service, including provisions for confidentiality and conflict of interest.

12.2.3 Where any certification activities are outsourced to third parties or subcontractors, the CB shall:

12.2.3.1 Ensure that any outsourced activities are conducted in compliance with the ISO 17065 and the GCR;

12.2.3.2 Remain fully liable for all activities and services and indemnify the client and BCI from any claims, damages, losses, or expenses arising from the actions or omissions of any third parties or subcontractors involved in the outsourced activities;

12.2.3.3 Ensure that the third party or subcontractor that provides outsourced services, and the personnel that it uses, are not involved with each other, either directly or through any other employer, in such a way that the credibility of the results could be compromised.

12.2.3.4 Have documented policies, procedures and records for the qualification, assessing and monitoring of all third parties or subcontractors that provide outsourced services used for certification activities;

- 12.2.3.5 Ensure the third parties or subcontractors providing the outsourced service conforms with applicable requirements of this GCR document and other BCI Normative Documents;
- 12.2.3.6 Maintain a list of approved providers of outsourced services;
- 12.2.3.7 Implement corrective actions for any breaches of the contract or other requirements of which it becomes aware;
- 12.2.3.8 Inform the client in advance of outsourcing activities, in order to provide the client with an opportunity to object.

12.2.4 The outsourced entity shall not make any claims that they are themselves approved for BCI audits. The outsourced entity shall not make decisions related to the BCI audits.

12.2.5 The outsourced entity's activities shall be included as part of the CBs annual internal audit.

12.2.6 The CB shall inform BCI in advance if it intends to outsource any work. BCI may object to such outsourcing on fair grounds.

Section 2: Certification Procedures

13. Applications for Certification

13.1 Required application information

For application for certification, the CB shall obtain all the necessary information to complete the certification process in accordance with the BCI requirements. This shall include (where relevant):

- 13.1.1 Clear identification of the **specific process or standard** for which the applicant seeks certification:
 - 13.1.1.1 Principles and Criteria (Producer level);
 - 13.1.1.2 Chain of Custody (Supply Chain level).
- 13.1.2 The entity name and where applicable, any relations with a larger corporation/ and or group;
- 13.1.3 Location or address - For Producer Level audits this relates to the area or field where BCI Cotton is being grown;
- 13.1.4 Any specific circumstances affecting their application; (e.g., recent restructuring, exceptional operational conditions, or safety concerns).
- 13.1.5 Resources, including key personnel names and roles;
- 13.1.6 Size, structure, and activities; for producer units this includes the number of farmers and learning groups;
- 13.1.7 The status of any current and previous certifications with BCI or related standards (e.g. for supply chain certification, other standards that could be combined with a BCI audit);
- 13.1.8 Any previous audit reports and non-conformities, if the Certification Applicant has been previously assessed against BCI Standards – in this case the CB shall request a copy of the audit report and any related documents such as corrective action plan;
- 13.1.9 **For CoC Audits**, the requirements outlined in the Chain of Custody Monitoring and Certification Requirements.
- 13.1.10 **For Producer Level audits**, the requirements outlined in the Principle and Criteria Monitoring and Certification Requirements.

13.2 Information to provide to applicants

Upon receiving an application, the CB shall provide the Certification Applicant with all necessary information about the certification process, including:

- 13.2.1 The contract for Certification Services;
- 13.2.2 Where the BCI or the strategic partner is not paying for assessments, information on certification fees and how these are calculated;
- 13.2.3 The relevant BCI Normative Documents to be assessed against (depending on the scope of certification), and any related guidance or interpretations;
- 13.2.4 Relevant audit procedures for the scope of certification requested;
- 13.2.5 Where applicable, additional information on labelling requirements for the use of the BCI certification mark on products and the licensing agreement required for the use of the same.

13.3 Application review by the CB

The CB shall review the application and related information to ensure that:

- 13.3.1 The information about the Certification Applicant and the product is sufficient for the certification process to be conducted;
- 13.3.2 Any known difference in understanding between the CB and the Certification Applicant is resolved, including agreement regarding standards or other Normative Documents;
- 13.3.3 The scope of certification sought is defined;
- 13.3.4 The means are available to perform all evaluation activities;
- 13.3.5 The CB has the competence and capability to perform the Services.
- 13.3.6 The Certification Applicant is or is not suspended against the relevant BCI standard and take the necessary steps.
- 13.3.7 If the CB identifies a conflict of interest or lacks competence or capacity to perform the certification, it must decline the application and notify the Certification applicant in writing, including the rationale.
- 13.3.8 The CB shall communicate in writing its decision on whether to accept or decline the application in a timely manner.
- 13.3.9 If the CB relies on previous certifications it issued to the Certification Applicant, to omit redundant evaluation steps the CB shall reference the existing Certification(s) in its records. If requested by the Certification Applicant, the CB shall provide justification for omission of activities.

13.4 Legal Agreements for Audit and Certification Services

This section ensures that all certification activities are supported by formal agreements defining rights, responsibilities, and obligations.

13.4.1 The CB shall have a legally enforceable agreement with Certification Applicants/clients to provide Services, which includes all elements under ISO 17065, section 4.1.2.2.

13.4.2 The CB shall have a legally enforceable agreement for certification of scheme participants with BCI, detailing the framework according to which the CB will provide Services against the BCI standards.

13.4.2.1 For Supply Chain level audits, the CB shall have the agreement with the Certification Applicant directly and the agreement shall define the steps to be taken before the certificate holder is authorised to use the BCI Certification Claim (where relevant).

13.4.2.2 For Producer level audits, the CB shall have legally enforceable agreements with the Certification Applicant (Large Farm (or Large Farm Group manager) or Programme Partner, on behalf of a PU). The CB shall also follow the requirements of 5.3 of the P&C Monitoring and Certification Requirements.

13.4.2.3 In cases where the Certification Applicant is not paying for the audit, the CB shall also conclude the Master Agreement for Direct Payment for Certification Services with BCI or a legal agreement with its local partner governing the payment for certification services.

13.4.3 All agreements mentioned in this section shall include reference to the CB's procedures for appeals and complaints.

13.4.4 All agreements mentioned in this section shall include:

13.4.4.1 BCI's access right to all BCI Audit Reports, supporting evidence, certification status and corrective actions;

13.4.4.2 BCI's right to make data requests aligned with the BCI Producer or Chain of Custody standards and data requirements;

13.4.4.3 BCI's and BCI strategic partners' right to shadow audits (including access to relevant documents and facilities);

13.4.4.4 BCI's right to request other documents as required from the Certificate holder.

13.4.4.5 BCI's right to request the CB to conduct a short-notice audit in response to a complaint, incident or findings from BCI Monitoring activities.

14. Audit Processes

This section defines how CBs must plan, conduct, and document audits.

14.1 Use of BCI Tools, Databases & Templates

The CB shall record audit information using the official BCI tools, databases and templates

14.2 Use of BCI Monitoring Findings

The CB shall take into consideration any findings from a BCI monitoring visit to determine next steps which could include, but not limited to, additional audits and impacts to the certification status of the Certification Applicant. This includes if access to any parts of the site or process or requests to these points specified above is unreasonably refused.

14.3 Audit Planning

14.3.1 The CB shall have a defined plan for all Services to allow for the necessary arrangements to be managed which also ensures that audits are carried out in line with the relevant procedures:

14.3.1.1 **For Producer level audits** – Principle and Criteria Monitoring and Certification Requirements;

14.3.1.2 **For Supply Chain level audits** – Chain of Custody Monitoring and Certification Requirements.

14.3.2 The CB shall consider in audit planning any areas of risk identified by BCI, this may include but is not limited to risks identified through open-source intelligence (OSINT).

14.3.3 Where a short-notice audit is required, the CB shall inform the applicant at least 48 hours in advance of the audit being conducted.

14.3.3.1 The CB shall not provide more than 3 working days notice of the short-notice audit.

14.4 Audit Team Composition

14.4.1 The CB shall assign specific personnel to undertake audit activities.

14.4.2 The CB shall use, and where necessary contract, interpreters as part of the audit process in cases where the local language is not spoken by the auditor.

14.4.2.1 The CB shall take all reasonable steps to ensure interpreters are independent and impartial from the Certification Applicant being assessed.

14.4.2.2 The CBs shall take all reasonable steps to ensure translations are a direct translation to maintain accuracy and completeness of the interviewee's statement.

14.5 Audit Location

14.5.1 For Producer level Audits - The CB shall carry out initial and renewal audits onsite, except for Force Majeure events. Audits may include remote components carried out by email, phone, and/or video calls (for example, a remote documentation request or first stage management system review via video call).

14.5.1.1 The CB shall outline their methodology for conducting remote audits and seek prior written approval from BCI, by emailing compliance@bettercotton.org, to conduct remote or partially remote audits where Force Majeure events make it not possible or safe to carry out standard assurance activities;

14.5.1.2 The CB shall outline to BCI their methodology for conducting the remote audit;

14.5.1.3 Other audits may be carried out remotely in line with the requirements in sections 3 and 5 of the P&C Monitoring and Certification Requirements.

14.5.2 For Supply Chain level Audits - The CB shall carry out initial and renewal audits onsite except where allowed in the BCI CoC Monitoring and Certification Requirements.

14.5.2.1 Outside of the exceptions referenced in the BCI CoC Monitoring and Certification Requirements, the CB shall seek prior written approval from BCI to conduct remote audits by emailing compliance@bettercotton.org.

14.6 Audit Process and Findings

14.6.1 The CB shall ensure all necessary information and/or documentation is made available for performing the evaluation tasks. This includes, as a minimum, the relevant Audit Report template as provided by BCI.

14.6.2 The CB shall have a formal opening meeting with the management of the client.

14.6.3 The CB shall carry out the evaluation activities that it undertakes with its internal resources and shall manage any outsourced resources in accordance with the evaluation plan.

14.6.4 The process shall be evaluated against the requirements covered by the scope of the BCI certification and other requirements specified by the BCI certification scheme.

14.6.5 The CB shall only rely on evaluation results related to certification completed prior to the application for certification, where it takes responsibility for the results and satisfies itself that the body that performed the evaluation fulfils the relevant requirements and those specified by the BCI certification scheme.

14.6.6 During the audit the CB shall evaluate the Certification Applicant for conformity against requirements in the relevant BCI standard:

14.6.6.1 **For Producer level audits**, the BCI Principles & Criteria.

14.6.6.2 **For Supply Chain level audits**, the Chain of Custody Standard.

14.6.6.3 **For Retailers and Brands**, the Chain of Custody Standard and the Claims Framework.

14.6.7 If any prior information is considered in the audit (e.g. relating to a previous certification or non-conformity), the CB shall be responsible for ensuring such information is credible and follows defined procedures for evaluation.

14.6.8 During audits and certification process, CBs may:

14.6.8.1 Provide explanations of the relevant standard and clarify any misunderstandings around indicators;

14.6.8.2 Provide explanations of BCI programme and related certification process;

14.6.8.3 Share documentation relating to the BCI programme;

14.6.8.4 Focus on highlighting good practices relevant to the auditee's areas of improvement.

14.6.9 During the audits and certification processes, the CB shall not:

14.6.9.1 Mandate specific approaches to the implementation of the relevant standard;

14.6.9.2 Mandate specific non-conformity remediation;

14.6.9.3 Offer any kind of paid or unpaid consultancy services or training;

14.6.9.4 Provide a formal indication of the certification decision during the audit visit;

14.6.9.5 Make recommendations on auditee documentation and procedures.

14.7 Audit Interviews

14.7.1 During interviews in the audit, the CB shall ensure:

14.7.1.1 All reasonable steps are taken to ensure that the interview process does not compromise the safety or job security of the workers and that the interview is conducted in a confidential manner;

14.7.1.2 The interviewee is informed that the interview is confidential and retaliation by the employer is not permitted;

14.7.1.3 The auditee management is not involved in the selection of farmers or workers for interview;

14.7.1.4 An interviewer who is most likely to gain trust of interviewees, especially in the case of farmer and worker interviews, is used.

14.7.1.5 For Supply Chain level audits, requirements set out in 2.5.3 of the CoC Monitoring and Certification Requirements are followed.

14.7.1.6 In Producer level audits, requirements set out in 5.6 of the P&C Monitoring and Certification Requirements and are followed.

14.7.1.7 Children (anyone under 18) shall never knowingly be interviewed unless as specified in Producer level audits see section 5.6 of the P&C Monitoring and Certification Requirements.

14.8 Findings

14.8.1 The CB shall share a summary of findings with the auditee and inform the Certification Applicant of any potential non-conformities during the audit process and in the closing meeting (the final decision on non-conformities will be made by the certification decision maker).

14.8.2 The CB shall communicate any additional processes to evaluate conformity based on such findings (e.g. further document reviews or interviews).

14.8.3 The CB shall provide the auditee the opportunity to ask questions throughout the audit and in the closing meeting.

14.8.4 The Certification Applicant can decide whether to continue the remainder of the audit process in line with the audit plan and any additional evaluation as specified above. If the Certification Applicant stops an audit and then decides to progress with the audit, the CB must consider if a new audit is required.

14.8.5 All findings from the audit shall be documented using the relevant reporting template from BCI (refer to Normative Documents).

14.8.5.1 All audit reports shall include clear, evidence-backed descriptions of non-conformity and, where relevant, conformity, with each applicable requirement of the relevant standard.

14.8.5.2 The CB shall collect supporting evidence (e.g. clear interview notes, copies of documents, photos) and retain it for a sufficient period to cover the review, certification decision, and any follow up or appeals processes.

14.8.5.3 The CB shall grade non-conformities as per section 5.7 of the P&C Monitoring and Certification Requirements and section 2.7 of the CoC Monitoring and Certification Requirements.

14.8.5.4 The CB shall provide information regarding the additional evaluation tasks needed to verify that non-conformities have been corrected as per section 5.7 of the P&C Monitoring and Certification Requirements and section 2.7.2 of the CoC Monitoring and Certification Requirements.

14.8.6 If any potential issues are identified that could lead to the Certification Applicant's suspension from the Better programme, the CB shall notify the BCI team within 48 hours of the audit concluding by emailing compliance@bettercotton.org. See section 2.7.1 of the CoC Monitoring and Certification Requirements for further information.

14.8.7 For Producer Level only - BCI has the right to review each assessment report in line with the requirements of table 7 and shall have a period of 7 calendar days to access each draft report and review and provide comments as a stakeholder (for the purpose of calibration and consistent implementation of the P&C). The CB shall ensure they share the report with BCI ahead of finalising the audit report

14.8.7.1 The BCI team, where they wish to provide comment, shall do so within 7 calendar days of receiving the audit report and not impact the certification timelines. The ultimate decision shall be made by the CB.

14.8.7.2 The CB shall take into consideration comments prior to finalisation of non-conformities.

14.8.7.3 The CB shall carry out the final review and make the certification decision.

15. Review and Certification Decision

15.1 Review of Findings

15.1.1 The CB shall designate a person(s) to review the Audit Report and findings. This person(s) shall:

15.1.1.1 Be separate from the audit team;

15.1.1.2 Have sufficient competency and knowledge of the relevant standard and audit processes, as per section 11 of this GCR document.

15.1.2 Recommendations for the certification decision shall be documented unless the review and certification decision are done by the same person.

15.2 Certification Decision

15.2.1 The CB shall be responsible and accountable for all certification decisions made under its remit, including ensuring all due processes have been followed.

15.2.2 The CB shall designate a specific person or committee to make the certification decision, ensuring:

15.2.2.1 These person(s) are separate from the audit team and have not been involved in the evaluation process;

15.2.2.2 These person(s) are employed by or contractually engaged by the CB or another entity under control of the CB (as per ISO 17065 section 7.6.4-7.6.5);

- 15.2.2.3 These person(s) shall be competent to undertake the activities;
- 15.2.2.4 The decision is based on the audit evidence and findings, the review information, and any other relevant information;
- 15.2.2.5 Guidance: The review and the certification decision can be completed concurrently by the same person or group of persons.

15.2.3 The CB shall maintain records on BCI certified entities, including identification of the Certification Applicant and the scope of certification.

15.3 Communication

- 15.3.1 The CB shall notify the Certification Applicant of the outcome of the certification decision in writing only after the legal agreement for certification has been signed and the audit, review, and certification decision processes completed.
- 15.3.2 The CB shall notify BCI of the outcome of the certification decision in writing, within the below time periods:
 - 15.3.2.1 **For Producer level audits** – See section 5.7 of the Principle and Criteria Monitoring and Certification Requirements for more information.
 - 15.3.2.2 **For Supply Chain level audits** – within 14 calendar days of receipt of the corrective action plan.
- 15.3.3 If there any delays to this process the CB shall notify both the client and BCI in writing.
- 15.3.4 If the certification is not granted the CB shall include the reasons for the decision.
- 15.3.5 If certification is granted, the CB shall issue a certificate to the client which includes the following information as a minimum:
 - 15.3.5.1 Name and address of the CB;
 - 15.3.5.2 Audit date;
 - 15.3.5.3 Certificate start date;
 - 15.3.5.4 Certificate issue date;
 - 15.3.5.5 Name and address of the client;
 - 15.3.5.6 Scope of certification;
 - 15.3.5.6.1 Principle and Criteria, refer to Principle and Criteria Monitoring and Certification Requirements for more information.

15.3.5.6.2 Chain of Custody, including supply chain model where relevant. Refer to BCI Chain of Custody Standard and, where relevant, the Claims Framework, for more information.

15.3.5.7 Expiration date of the Certificate;

15.3.5.8 The signature or other defined authorization of the specific person(s) from the CB accountable for the certification decision;

15.3.5.9 The unique BCI identification number for the certified entity (e.g. BCP or Producer code);

15.3.5.10 Unique Certificate number, which includes the BCI identification number for the certified entity;

15.3.5.11 The signature or other defined authorization of the Certification Body

15.3.6 The table below notes Certificate Duration.

Certification Type	Certificate Duration
Producer Certification	
Large Farms (Individual or Group)	3 years (unless initial where an additional year is allowed for permission to trade or certification)
Producer Units	4 years (unless initial where an additional year is allowed for permission to trade or certification)
Supply Chain Certification (including brands)	
	3 years

16. Closing of Non-Conformities

16.1 The CB shall ensure they have competent personnel and designated resource for corrective action follow up and closure.

16.2 The CB shall be responsible for reviewing completed Corrective Action Plans (CAP) received by clients and providing feedback.

16.2.1 If the CAP is not of sufficient quality to address and correct the non-conformities identified, feedback may be provided to the client to make improvements.

16.2.2 Where the entity is already certified, if a complete and sufficient quality CAP has not been received within the defined timeframe in the P&C Monitoring and Certification Requirements and CoC Monitoring and Certification requirements, the certification shall be suspended.

16.3 The CB shall be responsible for reviewing evidence provided to ensure the corrective actions are implemented and address the non-conformities.

16.3.1 If correction actions are implemented, the CB shall issue a certificate.

16.3.2 If corrective actions are not implemented or are not sufficient to address the non-conformity, the certification shall not be issued.

17. Surveillance

17.1 CBs shall carry out surveillance audits when there is a significant risk or credible concern about potential non-conformity, for example by BCI directly or through a whistleblowing mechanism or public report. The CB shall update BCI on any surveillance activities undertaken.

17.2 For surveillance audits, the CB shall follow the general requirements in this GCR document and the relevant Normative Documents (specifically section 5.11 of the P&C Monitoring and Certification Requirements and 3.3 of the CoC Monitoring and Certification Requirements) and relating to the audit process, review, certification decision and communication.

17.3 In addition, the CB shall follow any specific BCI defined procedures for surveillance audits.

17.4 Where an entity is using the BCI mark, the CB shall establish surveillance, including periodic surveillance activities to ensure ongoing fulfilment of process or service requirements. As a minimum, this shall include renewal audits and response to any issues flagged by a relevant stakeholder.

18. Changes to Certification

18.1 Updated Requirements and Changes from BCI

18.1.1 When BCI Standards, Normative Documents, or other relevant procedures are updated, the CB shall ensure these updates are communicated to all clients within 10 working days, along with the timeline for implementing any changes.

18.1.2 The CB shall be responsible for verifying that any changes required by BCI are understood and implemented by client.

18.2 Other Changes to Certification

18.2.1 If the CB receives any other information which could affect Services or the certification status of Certificate holder, it shall review the information and propose reasonable actions to address it.

18.2.2 If the CB determines that an audit is required on the basis of new information or changes, the CB shall follow the same general requirements in this GCR document, and

the relevant Normative Documents, relating to audit process, review, certification decision and communication as set out in the relevant sections of this GCR document.

18.2.3 The CB shall document the rationale if there is any deviation from these standard procedures, or if any activities are not carried out.

18.2.4 If there are any changes to certification or scope of a client, the CB shall notify BCI within 10 working days.

18.3 Cancelling, Reducing or Suspending Certification

18.3.1 If the CB receives sufficient, substantiated evidence of non-conformity to affect the certification status of a Certificate holder (e.g., through surveillance audits or other means), the CB shall review the evidence and decide to take appropriate action to suspend, cancel or reduce the scope of certification (where relevant).

18.3.2 The CB shall suspend a Certificate in the following cases:

18.3.2.1 Failure to meet ongoing requirements to maintain certification, as set out in the relevant BCI Certification Procedures [for example, not submitting required Self Audits or other data];

18.3.2.2 CAP is not submitted by the required deadline, or is incomplete and/or of insufficient quality;

18.3.2.3 Corrective actions have not been implemented within the defined timeframe; or they are not sufficient to address the non-conformity;

18.3.2.4 **For Producer level audits** - Systemic non-conformity is found during a renewal or surveillance audit (or any additional evaluation activity carried out by the CB);

18.3.2.5 **For Supply Chain level audits** - See section 3.5 of the CoC Monitoring and Certification Requirements;

18.3.2.6 Scheduled audits are not carried out or access is restricted (e.g. CB is not permitted access to certain documents or sites required for the full audit);

18.3.2.7 Non-payment of agreed fees for certification services.

18.3.3 The CB shall cancel the certification where requested by the Certificate holder (e.g. due to withdrawing from the BCI programme).

18.3.4 **For Producer level audits** - certificates shall also be cancelled due to the following factors:

18.3.4.1.1 Producer is no longer growing cotton permanently (PUs only);

18.3.4.1.2 Producer Unit is dissolved, or Programme Partner agreement is no longer valid;

18.3.4.1.3 *Guidance: for Producer Certification, the license suspension will affect either the current or following season, depending on the timing of the reason for suspension.*

18.4 Communication of Changes

18.4.1 If certification is cancelled (by request of the Certificate holder), suspended or withdrawn, the CB shall take actions specified by the relevant BCI Normative Documents and shall make all necessary modifications to formal certification documents, public information, authorizations for use of the BCI Certification marks, etc., in order to ensure it provides no indication that the product continues to be certified.

18.4.2 If a scope of certification is reduced, the CB shall take actions specified by the relevant BCI Normative Documents and shall make all necessary modifications to formal certification documents, public information, authorizations for use of marks, etc., in order to ensure the reduced scope of certification is clearly communicated to the client and clearly specified in certification documentation and public information.

18.4.3 The CB shall designate a person(s) to communicate a suspension of certification.

18.4.4 When certification is cancelled, reduced, or suspended, the CB shall communicate these changes in writing to the Certificate holder in a timely manner and shall ensure that:

18.4.4.1 Changes in the certification status and validity are documented and understood;

18.4.4.2 Measures are in place to prevent any unauthorised reference to certification status or use of claims during the suspension/ cancellation period;

18.4.4.3 Any actions required to reinstate the certificate are clearly communicated and understood by the client (where relevant);

18.4.4.4 Any internal records or public facing information is also updated to reflect the changes in certification status.

18.5 Reinstatement

18.5.1 The CB may carry out a full audit or part audit focused on the requirements leading to suspension ahead of reinstating a certificate. If the CB carries out an audit or other review ahead of reinstating a certificate, the CB shall follow the same general requirements in this document relating to audit process, review, certification decision and communication as set out in the relevant sections of this GCR document.

18.5.1.1 If a certification is reinstated, or if the scope of a certificate is reduced, the CB shall take steps to ensure that these changes are clearly documented in all BCI systems.

18.5.1.2 The CB shall ensure that all relevant records are updated promptly and accurately to ensure that any claims or communication about the certified status are correct and current.

19. Transfer of Certificates

Where a certificate holder is transferring to a new CB, the new CB shall have a process in place to conduct due diligence on the certification and obtain the relevant information. The new CB shall carry out a review of transferring certification and the Certificate holder.

19.1 Client voluntary CB transfer

19.1.1 If a Certificate holder contacts a new CB with a request to transfer their certificate, the new CB shall request and review the latest Audit Report(s) and any other relevant supporting documents (e.g. Corrective Action Plan, etc).

19.1.2 The new CB shall verify with BCI that the Certificate holder has a valid certificate.

20.1.2.1 *Guidance: If a Producer certificate is currently suspended, the certificate cannot be transferred to a new CB during the suspension, except for cases where the current CB can no longer provide certification services.*

19.1.3 If an audit is not yet due, the new CB may issue a Certificate for the length of time remaining on the previous certificate, based on the review evidence from the previous audit.

19.1.4 The Certificate holder shall be responsible for ensuring that the previous CB is informed, and the contract is cancelled as soon as the contract with the new CB is signed.

19.2 Transfer in Case of Change in Status of CB

If a CB loses accreditation, it must support the transfer of all relevant records to the new CB, work with the new CB to ensure a smooth transition and inform clients of the change and guide them on certification transfer.

20. Complaints and Appeals

20.1 The CB shall have a publicly available documented process for managing appeals against certification decisions and for managing complaints the CB receives in relation to the certification process which must be in line with the requirements of ISO 17065.

20.2 The CB shall maintain a record of all complaints and appeals received and shall make this available upon request to BCI.

20.3 The CB shall confirm whether the complaint or appeal relates to certification activities for which it is responsible and, if so, shall address it.

20.4 The CB shall be liable for the cost of the appeal should the certification decision change.

20.5 The decision resolving the complaint or appeal shall be made by, or reviewed and approved by person(s) not involved in the Services related to the complaint or appeal.

20.6 To ensure that there is no conflict of interest, personnel (including those acting in a managerial capacity) who have provided consultancy for a client, or been employed by a client, shall not be used by the CB to review or approve the resolution of a complaint or appeal for that client within two years following the end of the consultancy or employment.

20.7 The CB shall make a decision on appeals and communicate this decision in writing, with justification, within 30 calendar days of receiving the appeal. If this timeline is not possible, the CB shall provide a written explanation and adjusted timeline to the appellant.

20.8 Whenever possible, the CB shall give formal notice of the outcome and the end of the complaint process to the complainant.

20.9 Any changes in certification status resulting from an appeal shall be communicated to BCI and the appellant in writing within 5 working days of the decision being made.

20.10 The CB shall take any subsequent action needed to resolve the complaint or appeal.

21. Accreditation Body Requirements

21.1 Accreditation Bodies shall be legal entities.

21.2 Accreditation Bodies shall be signatories of the International Accreditation Forum Multilateral Recognition Arrangement.

21.3 Accreditation Bodies shall accredit Certification Bodies to ISO17065/ Product Certification to provide certification services for BCI in line with sections [23](#), [24](#) and [25](#) of this document.

21.4 The Accreditation Body shall operate in accordance with the requirements of ISO 17011.

21.5 The Accreditation Body shall have a signed legal agreement with BCI.

21.6 The Accreditation Body shall be independent of the Certification Body they are accrediting.

21.7 The Accreditation Body shall be responsible for ensuring their own assessors are trained on BCI Standards, normative documents and processes.

21.8 The Accreditation Body shall allow BCI to observe witness audits upon request.

21.9 The Accreditation Body will collaborate with BCI in the following areas as a minimum:

21.9.1 Sharing aggregated information on common risks and trends in performance to help inform BCI training and oversight of certification bodies.

21.9.2 Receiving information on performance risks or issues from BCI to target their accreditation activities.

21.9.3 Minimising impact on certified organisations in the case of an accreditation suspension and withdrawal.

21.10 The Accreditation Body shall provide an annual report to BCI on its accreditation activities related to the BCI Standards, which includes:

21.10.1 Summary of all accreditation decisions made.

21.10.2 Summary of complaints and stakeholder feedback received.

21.10.3 Any other relevant information.

21.11 The Accreditation Body will inform BCI of changes of accreditation status of respective Certification Bodies.

22. Application for accreditation to ISO 17065 for BCI scope

22.1 The accreditation body shall check with BCI if the Certification Body has been approved to conduct audits against the BCI programme.

22.2 The accreditation body shall consider applications from Certification Bodies for accreditation to ISO 17065 for BCI scope of accreditation as either:

22.2.1 A full accreditation if no existing ISO17065 accreditation is in place.

22.2.2 An extension to their existing ISO 17065 accreditation scope.

22.3 The accreditation body shall provide full transparency of fees to the Certification Body:

22.3.1 Publishing or providing the fee rates (e.g. day rate) on request prior to application.

22.3.2 Providing a full quotation upon application review.

22.3.3 The accreditation body shall notify BCI of each application for accreditation to BCI scope they receive by emailing compliance@bettercotton.org.

23. Initial assessment of certification bodies with existing ISO 17065 accreditation to include BCI scope

23.1 The accreditation body shall conduct the following activities to determine if ISO 17065 accreditation can be extended for BCI scope:

23.1.1 A desk review of the certification procedures following ISO 17065 that now incorporate BCI certification.

23.1.2 Shadow of a certification audit of 1 company/organisation per BCI Standard in scope of accreditation (i.e. 1 supply chain company for CoC certification and 1 producer for P&C certification is applying to be accredited to both).

23.1.2.1 A desk review of the technical review and decision-making processes relating to these audits.

24. Initial assessment of certification bodies with existing ISO 17065 accreditation for BCI scope (no other ISO 17065 accreditation)

24.1 The accreditation body shall conduct the following activities to determine if ISO 17065 accreditation can be awarded BCI scope:

24.1.1 An office assessment of the main office and 20% of the affiliate offices including assessment that:

- Procedures for BCI certification follow ISO 17065 and BCI requirements.
- People with responsibilities for BCI certification know and understand these.

24.1.2 Shadowing a certification audit of 1 company/organisation per BCI Standard in scope of accreditation (i.e. 1 supply chain company for CoC certification and 1 producer for P&C certification if the Certification Body is accredited to both).

24.1.3 A desk review of the technical review and decision-making processes relating to these audits.

25. Ongoing assessment of certification bodies with existing ISO 17065 accreditation for BCI scope

25.1 From 1 year after the initial accreditation is awarded the Accreditation Body shall carry out the following activities as per the table below:

Audit activity	Format	Content	Frequency, triggers and sample
Certification file review	Remote or onsite record check	Review the certification process from application to decision	Every 2 years check the records relating to at least 1 company/organisation per BCI Standard in scope. For Certification bodies with more than 100 certificates for either BCI Standard check at least 1% of all certificates. For Certification bodies with producer certification in multiple countries cycle through each country in each year.
Certification procedures check	Remote check of documents	Confirm procedures aligned with BCI requirements and ISO 17065	Annually confirm if any substantive changes to public certification procedures.
Certification body main office/s audit	Onsite interview, document and record check	Sample all certification processes including but not limited to appeals, complaints, auditor training and oversight.	Every 4 years conduct an on-site audit of the main office/s
Certification body affiliate office audit	Onsite interview, document and record check	Sample relevant certification processes including but not limited to auditor training and oversight.	Only triggered where findings from other activities identify a risk

Shadow audits	Onsite attending a certification audit to a BCI Standard and remote check of following records	Observe the onsite audit and check the follow up related processes of technical review and decision	Every 4 years at least 1 company/organisation per BCI Standard in scope is shadowed. For Certification bodies with more than 100 certificates for either BCI Standard check at least 1% of all certificates. For Certification bodies with producer certification in multiple countries cycle through each country in each year.
---------------	--	---	--

25.2 The accreditation body shall, when working with a certification body with ISO 17065 for multiple scopes and schemes, combine assessment activities wherever possible.

Annex 1: BCI Lead Auditor Competency Requirements

General

Minimum

- Experience of conducting relevant third-party audits, including interviewing management, workers and reviewing management system documents.
- Trained in auditing principles, procedures, techniques, and behaviours as described in ISO 19011.
- Ability to prepare well-documented third-party verification reports with clear analysis and specific evidence to support conformity / non-conformity findings.
- Ability to manage a variety of stakeholder interests whilst producing independent and unbiased outputs.
- Strong attention to detail.
- Ability to perform basic and operational data analysis.
- Good time management skills.
- CoC only: Appropriate technical expertise (within the team) preferably with experience in developing traceability/chain of custody solutions for agricultural commodities.

Desirable

- The ability to read and speak in the language(s) used by audit stakeholders.
- Relevant university degree.
- Previous experience with BCI.
- CoC only; previous experience with auditing/ assessing financial and tax documents as they pertain to Chain of Custody and traceability.

Suggested Verification mechanism for CB

- CV and Audit log.
- Qualification/ education/ training certificate.
- Review of previous third-party audit reports.

- Shadow audit¹.

Knowledge and Skills

Essential

- Knowledge of relevant national and local laws and regulations such as environment, labour, health and safety, land and water ownership in the country of verification visits.
- Knowledge of prevailing industry and cotton farming practices.
- Knowledge of local social and cultural conditions to be considered in the conduct of a verification visit.
- Understanding of handling sensitive data, information, documents, records and maintaining confidentiality.
- Farm Level only: Ability to identifying and gathering information from local knowledgeable sources, including human rights, labour, environment, cotton organisations/individuals and other local institutions.

Suggested Verification mechanism for CB

- CV review.
- Lead auditor interview.
- Audit log review.

Understanding of BCI requirements

Although an understanding of the BCI system is required at the point of application, training on BCI is mandatory for all auditors.

Essential

- Understanding of the relevant assessing criteria and how to assess farm level compliance with these.
- Ability to identify areas of non-conformity within audit criteria and triangulate evidence of non-conformity in audit reports.

Suggested Verification Mechanism for CB

- Attend BCI third party auditor training.
- Pass online audit(s) before undertaking first audit.
- Shadow audit.
- Commitment from auditors to review updates to audit resources.

¹A shadow audit is where a BCI auditor shadows the third-party auditor on an audit to observe and evaluate the auditors performance. This is sometimes also referred to as a witness audit.

