

# Principles & Criteria Monitoring and Certification Requirements

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# Overview of Changes

The following changes were made to version 1.2 of this document to incorporate important information and correct inaccuracies. These changes were the result of careful consideration of feedback received from various BCI staff members and both global and country Assurance teams. The changes are as follows:

- ✓ **Clause 2.9.3:** Specified that self-assessments should be based on the latest available version of the standard.
- ✓ **Clause 3.4.18:** Clarified that internal audits are shared every year to the Certification Body at a time agreed with them.
- ✓ **Clause 4.4.2:** Confirmed that BCI can use GIS analysis to identify and flag land conversion risks to Producers (to inform their monitoring) or Certification Bodies (to inform their audit planning).
- ✓ **Clause 4.5.1:** Confirmed BCI's responsibility to communicate volume release dates to the Certification Body.
- ✓ **Clause 4.9.1:** Confirmed the actual data sets that are shared.
- ✓ **Sections 2.11 and 5.10:** Added more detailed information and guidance on appeals, including on when the Producer has the right to submit an appeal, who should bear appeal costs and in what circumstances, and what factors should be considered when charging a Producer for appeal costs.
- ✓ **Clause 4.9.1:** Added the specific data fields that are publicly available.
- ✓ **Section 5.3:** Provided further details on Certification Bodies' and BCI's responsibilities during the Producer application process, especially around assuring Producer eligibility.
- ✓ **Clause 5.3.12:** Defined timings for Certification Bodies to finalise and communicate certification agreements.
- ✓ **Clause 5.4.3:** Defined the requirements for audit teams on social audit competency, when women need to be in the team to interview women and when language skills are required.
- ✓ **Clause 5.4.6:** Confirmed that the auditor shall consider any BCI Monitoring assessment reports as part of their audit preparation.
- ✓ **Clause 5.4.8:** Specified that the land conversion self-declaration is to be integrated into the self-assessment.
- ✓ **Clause 5.5.7:** Clarified Certification Bodies' and BCI's responsibilities around ensuring only the applicable standard indicators are confirmed ahead of each P&C audit.

- ✓ **Clause 5.6.16:** Confirmed how interviews are to be conducted and when children can be interviewed.
- ✓ **Section 5.6, Table 12:** Confirmed how to audit land conversion requirements and clarified consulting BCI in preparing for audit is not considered one of the external sources.
- ✓ **Section 5.6, Table 13:** Clarified that the workforce can include non-hired labour.
- ✓ **Section 5.7:** Confirmed that for initial audits permission to trade is only issued upon receipt of a corrective action plan of sufficient quality to address the non-conformities.
- ✓ **5.7.17:** Aligned timing of upload of corrective action evidence with implementation timeline.
- ✓ **Clause 5.7.4:** Confirmed where individuals names should be excluded from the report.
- ✓ **Clause 5.7.13:** Allowed the Certification Body to extend the timeframe for submission of the Corrective Action Plan from 30 days to 90 days upon reasonable justification from the Producer without the need for a variation from BCI.
- ✓ **Clause 5.8.22:** Confirmed that a certificate can only be cancelled on the transfer date.
- ✓ **Clause 5.8.8:** Added the requirement for an effective Corrective Action Plan (CAP) to have been received by the Certification Body before issuing an initial permission to trade.
- ✓ **Section 5.8, Tables 20, 21 and 22:** Introduced a requirement that failure to submit the CAP within the agreed timeline nor agree an extension results in an 18-month suspension of certification or, if initial audit, no permission to trade being awarded.
- ✓ **Section 5.9:** Created a new section on the Annual Authorised Volume (AAV) issue process for certification.
- ✓ **Clause 5.11.1:** Clarified that force majeure can be used as a reason for remote audits only in the case of renewal audits.
- ✓ **Section 5.14, Table 23:** Clarified that certification can be withdrawn on the basis of no longer being eligible, i.e. not submitting required information (e.g. self-assessment, RIR) or no longer having a valid partnership agreement relating to the Producer Unit.
- ✓ **Clause 5.12.4:** Clarified that surveillance audits should use the same version of the standard used during the initial audit.
- ✓ **Clause 5.17.4:** Provided detailed guidance to help Certification Bodies decide if a new certification audit is required when a Producer Unit moves to a new Programme Partner.
- ✓ **Annex 4:** Defined the requirements for social auditing.
- ✓ **Annex 5:** Integrated the guidance for interviewing children already published into this document.



- ✓ Re-formatted the whole document according to the new Better Cotton Initiative Brand Guidelines.
- ✓ Addressed typos, unnecessary repetitions, inaccuracies and outdated links.

# 1. Introduction

## 1.1 BCI Producer Certification

The Producer Monitoring and Certification Requirements are a critical component of the Better Cotton Initiative (BCI) Standard System, which aims to improve livelihoods and economic development in cotton-producing areas and reduce the environmental impact of cotton production. The Producer Monitoring and Certification Requirements provides a roadmap for participating Producers (see [Certification Key Terms and Definitions](#)) to progress from baseline performance to meeting the [Indicators of the BCI Principles and Criteria](#), and eventually achieving long-term improvement goals, and eventually achieving long-term improvement goals.

The main objectives of the assurance model are to:

1. Verify that cotton Producers have met the Indicators of the BCI Principles and Criteria before they achieve BCI certification;
2. Provide a framework to ensure that BCI Producers, once certified, continue to make progress against their continuous improvement priorities and receive adequate capacity strengthening support;
3. Create channels for ongoing learning, through sharing information back to Producers (and Programme Partners, if applicable) to identify improvement opportunities or compliance gaps;
4. Measure the sustainability performance of BCI Producers and overall programme impacts through regular collection of field-level ([Results Indicator](#)) data.

BCI's approach to Producer monitoring and certification is unique from many other standard systems in two regards. First, it aims to balance credibility with scalability and cost-effectiveness, through combining third party certification with first and second party monitoring, including monitoring visits from BCI Country Teams, support visits by Programme Partners and regular self-assessments by Producers themselves.

Second, the model puts a strong emphasis on capacity strengthening and continuous improvement. Producers are required to track ongoing sustainability improvements in order to maintain their certification. Assurance activities focus not only on compliance but also on identifying areas where further support or capacity strengthening is needed.

### Categorising Farms and Producers

A Producer Unit is a group of Smallholders or Medium Farms who are organised together under a common management structure to participate in the BCI Programme. Each Producer Unit is overseen by a dedicated Producer Unit Manager who is responsible for implementing an internal management system to support, train and monitor farmers across the Producer Unit.

The term '**Producer**' in the context of the BCI Standard System refers to either an individual Large Farm or a Producer Unit of Smallholders or Medium Farms.

At the Smallholder and Medium Farm level, BCI works in collaboration with a network of trusted Programme Partners to organise farmers into Producer Units and implement the Principles & Criteria at field level. This includes hiring and training Producer Unit Managers and Field Facilitators and carrying out capacity strengthening and monitoring with farmers at the field level (for further information, see 'Producer Requirements').

Under the BCI Standard System, farms are differentiated into three categories based on the production methods, land holding size, and workforces they use:

- **Smallholders:** Farmers who are not structurally dependent on permanent hired labour, and whose farm size does not exceed 20 ha of cotton. Maximum size of 7000 farmers can be grouped under one Smallholder Producer Unit; the recommended size is approximately 3500 farmers.
- **Medium Farms:** Farmers who are structurally dependent on permanent hired labour, and whose farm size is between 20 and 200 ha of cotton. Medium Farm PUs are typically around 100 farmers.
- **Large Farms:** Farmers who have a farm size above 200 ha of cotton and either have mechanised production or are structurally dependent on permanent hired labour.

Smallholders and Medium Farms are grouped into Producer Units and are certified to sell BCI Cotton at the Producer Unit level.

Smallholder Producer Units are further divided into Learning Groups of approximately 35 farmers (with a Lead Farmer in each one) managed by a Field Facilitator to help facilitate learning.

Typically, each Field Facilitator in a Smallholder Producer Unit will work with about 10 LGs, or 350 farmers, at most to ensure they can have regular contact with each farmer.

Some Large Farms participate with BCI on an individual basis, while others are engaged through a Large Farm Group Certification Model. In this approach, a number of farms are overseen by a dedicated Group Manager and certification includes all farms in the group. Only farms with under 30 workers and a mechanised harvest are eligible for Large Farm Group Certification (see 'Large Farm Group Model' in the 'Producer Requirements').

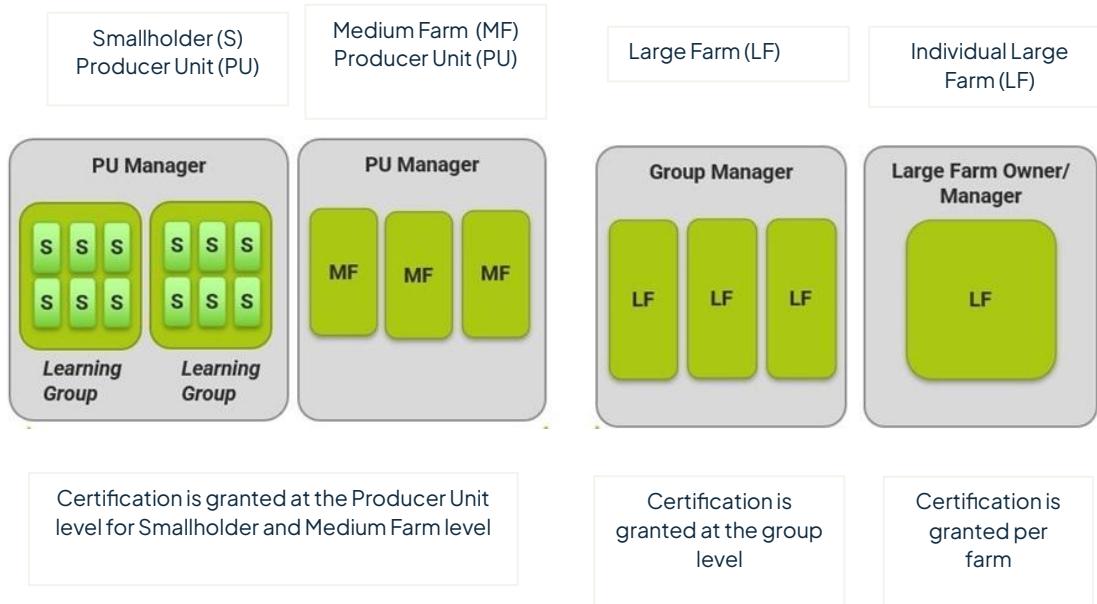


Figure 1: Showing the breakdown of the 3 types of Producer categorisations, as well as the Large Farm Group model.

## 1.2 Purpose of This Document

This document outlines the requirements for:

- Certification Bodies to carry out audits and provide certification to the BCI Principles and Criteria;
- Producers applying for and maintaining certification and eligibility to trade BCI Cotton.

Therefore, not all sections of this document are applicable to everyone. See Table 1 below for the breakdown of sections and who they are relevant to.

Document section	Relevant Groups	References
1 Intro	N/A	Explanation for all stakeholders
2 Producer Requirements	All Producers (including Large Farm Groups)	Certification Bodies of Producers
3 Large Farm Group Requirements	Large Farm Group Managers and farms within Large Farm Groups (as per relevant sub-sections); Certification Bodies as cross referenced in <a href="#">Section 5</a> .	Large Farm Groups and their Certification Body only
4 BCI oversight	BCI	Producers and Certification Bodies

5 Certification process	Certification Bodies; Producers; BCI only if/as cross referenced in Sections <a href="#">2</a> , <a href="#">3</a> and <a href="#">4</a> .	Producers and Certification Bodies
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Table 1: Document Sections and Who They are Relevant to.

## 1.3 Normative Documents

The following documents are relevant to stakeholders of the Principles & Criteria monitoring and certification requirements:

- [BCI Principles and Criteria](#)
- [General Certification Requirements for Certification Bodies](#)
- [Assurance Manual for Licensees](#)
- [Certification Key Terms and Definitions](#)
- [BCI Derogations Policy](#)
- [BCI Active Derogation List](#)
- [Highly Hazardous Pesticide Exceptional Use Process](#)
- [BCI Highly Hazardous Pesticides List](#)
- [BCI Farm Data Requirements](#)
- [Working with Results Indicators](#)
- [CoC Monitoring and Certification Requirements](#)
- [BCI INTACT Training Manual for Certification Bodies](#).

## 1.4 Effective Date

These requirements are effective for all certification audits and related certifications from 1st March 2025 **(to be updated)**.

### Transition Timelines

All Producers going through their first audit to the BCI Principles & Criteria from 2025 onwards will be certified under these requirements. For Producers who currently have an Active license,

transition to certification will occur, at the latest, when their license expires. During the years of 2025, 2026 and 2027, a Producer having either a valid BCI license or valid certification to the BCI Principles & Criteria can trade BCI Cotton and be issued volumes in the BCI Platform.

In a Producer's season of transition from licensing to certification, BCI may extend licenses in order to allow the certification process to progress without need for permission to trade to be awarded ahead of the date that BCI Cotton volumes are released in the region.

Producers who have a valid license and are yet to undergo certification should follow the [BCI Assurance Manual for Licensees](#) instead of this document until such a time as they transition to certification.

## 1.5 Document Control

This document is issued, effective and managed as below.

<b>Issue date</b>	To update later
<b>Effective date</b>	To update later
<b>Previous version</b>	V1.2 September 2025
<b>Contact</b>	<p>Ownership of this document is with the BCI Standards and Systems Integrity Team: <a href="mailto:compliance@bettercotton.org">compliance@bettercotton.org</a></p> <p>Better Cotton Initiative            Ch. De Balexert 7-9            1219 Châtelaine            Switzerland</p>

## 1.6 Summary of Key Steps for Relevant Stakeholders

Step	Timing	Relevant Section	Who is Responsible		
			Producer and/or PP	BCI	Certification Body
1. Register to programme	PUs: Start of previous season; LFs: In advance of the season	Producer Requirements	X	X	

2. Set-up year (Producer Units only)	Previous season	Producer Requirements	X	X	
3. Application and contracting	Before start of sowing	Certification Body Process	X	X (if paying for certification)	X
4. Initial audit	Between start of sowing and end of harvest	Producer Requirements; Certification Body Process	X		X
5. Seasonal data submissions	Within the season, at specified times	Producer Requirements	X		
6. Decision	14 days after closing meeting. If the audit report is selected for review by BCI, an extra 14 days are granted to the Certification Body to make a decision on certification	Certification Body Process			X
7. Volumes issued	BCI Cotton volume release date for the region	BCI Oversight		X	
8. Corrective action process	Plan within 2 weeks of receipt of non-conformities, implement within 6-12 months	Certification Body Process	X		X
9. Audit report	Within 14 days of receipt of the corrective action plan	Certification Body Process			X

10. Certificate issue	If and when corrections implemented, or at initial decision if no non-conformities present	Certification Body Process			X
11. Ongoing monitoring	Throughout certification	Producer Requirements; BCI Oversight; Certification Body Process	X	X	X

**Table 2: Summary of the Key Steps in Principles and Criteria Monitoring and Certification per Producer.**

Note: For Large Farm Groups, also reference Large Farm Group Requirements section for each step.

# 2. Producer Requirements

*Producer Requirements are relevant to Producer Units, Large Farms and Large Farm Groups*

## 2.1 Producer's Trade of BCI Cotton

2.1.1 Producers shall only trade BCI Cotton if the following conditions are met:

- They hold a BCI certification or license as follows: Valid certification to the BCI Principles & Criteria and, where relevant, related group requirements, the scope of which covers the cotton to be traded or/and permission to trade; Or a valid license for BCI, which covers the cotton to be traded (only valid until 2028).
- The volumes they can trade have been released by BCI into the BCI Platform.
- If the Producer, partner, or farm within the Producer Unit retains ownership of the cotton whilst it is being ginned, they are also required to adhere to the Protocol for Producers with subcontracted gins within the CoC Monitoring and Certification Requirements.

2.1.2 Producers who hold active certificates or licenses to sell BCI Cotton can make claims about their status, provided they:

- Reflect the accurate status of the certificate or license for the given cotton season, as indicated via the public list of active certificates/licenses (available on the BCI website) and/or as indicated via the latest certification/license communication from BCI.
- Clearly indicate the duration of the certificate or license and/or the season for which the Producer is allowed to sell BCI Cotton.

## 2.2 Producer Roles and Responsibilities

2.2.1 Partners and Producers shall comply with the following:

- The BCI Principles and Criteria;
- The relevant requirements of this document.

2.2.2 Partners and Producers shall take on the roles and responsibilities listed in [Table 3](#).

2.2.3 Where a Partner, Producer or farm within a Producer Unit owns the cotton through the ginning, they shall also follow the Protocol for Producers with Subcontracted Gins within the [CoC Monitoring and Certification Requirements](#).

Stakeholder	Role in Certification Model
Farmer from Smallholder and Medium Farms	<p>Farmers from Smallholders and Medium Farms participate in capacity strengthening activities organised by the Producer Unit Management. Farmers are expected to apply learnings in order to adopt more sustainable farming practices. Farmers are also responsible for maintaining farm-level data on inputs and outputs to enable the Producer Unit tracking of progress and to build an understanding of the impacts.</p> <p>Farmers categorised as Large Farms are responsible for ensuring they meet the Principles &amp; Criteria Indicators and work to adopt and improve their sustainable farming practices.</p>
Large Farm Management	<p>The person/people responsible for managing the cotton growing and harvest on the farm are responsible for ensuring that the Principles &amp; Criteria indicators are met.</p>
Field Facilitator (Producer Units only)	<p>Field Facilitators are part of the management structure for BCI PUs. They are trained field-based staff who help organise farmers, collect farm-level data and carry out capacity strengthening activities in farming communities. Field Facilitators are typically employed by either Programme Partners or their affiliated Local Partners.</p>
Producer Unit Manager (Producer Units only)	<p>The main individual responsible for implementation of the BCI Principles &amp; Criteria at the Producer Unit level and assuring compliance. The Producer Unit Manager, together with the Field Facilitators, identifies areas where farmers require improvement to meet the BCI Principles &amp; Criteria and, together with Field Facilitators, works to achieve this. This responsibility includes:</p> <ul style="list-style-type: none"> <li>• Developing and ensuring the implementation of activity and monitoring plans (Indicators 1.1.1, 1.1.2);</li> <li>• Conducting and acting on stakeholder consultation (Indicator 1.1.3);</li> <li>• Developing and effectively implementing of labour monitoring and remediation (Indicator 5.1.1);</li> <li>• Conducting internal assessments and completing self-assessments;</li> <li>• Planning and implementing corrective actions (as outputs of the Certification Body audit or internal assessment).</li> </ul> <p>The Producer Unit Manager is additionally responsible for strengthening capacities of the Field Facilitators.</p>
Programme Partner (Producer Units only)	<p>BCI's Programme Partners are organisations with local expertise who oversee the set-up and management of PUs under the assurance model. Programme Partners assume full responsibility for project delivery at the field level, including establishing the</p>

	<p>management structure of Producer Units, recruiting and training Producer Unit Managers and Field Facilitators, and providing Producer Units with ongoing oversight and support, including regular field-level engagement.</p> <p>Programme Partner representatives are also responsible for supporting and strengthening the capacity of Producer Unit Managers and together with the Producer Unit Manager the related Field Facilitators. Supporting Producer Units in the identification of continuous improvement priorities and monitoring Producer Unit performance through Readiness Checks and Support Visits.</p>
Large Farm Group Manager	The main individual responsible for ensuring compliance with the Large Farm Group requirements and compliance of the farms within their group with the BCI Principles and Criteria.
Local Partner (Producer Units only)	Some Programme Partners may delegate specific field-level implementation activities to Local Partners. Local Partners are entities with a strong field presence and technical expertise relevant to the geographical area. Local Partners are overseen by the Programme Partner, and the Programme Partner is accountable for ensuring the efficacy of the Local Partner through ongoing monitoring and engagement.

Table 3: The Roles and Responsibilities for Producers.

## 2.3 Producer Unit Set-Up Requirements

**Section 2.3 is NOT relevant to Large Farms nor Large Farm Groups.**

2.3.1 Producer Units joining, and in some cases rejoining, the BCI Programme will be required to complete a set-up season prior to the season in which they undergo certification. The idea of this requirement is to allow the Producer Unit to familiarise themselves with the requirements of the programme and put in place the infrastructure and practices required to be successful in their certification. A breakdown of the requirements is given below.

2.3.2 The Partner shall complete the following activities in order to be eligible for a certification audit:

- Hire, recruit and train a Producer Unit Manager and Field Facilitators;
- Establish an effective Producer Unit management and monitoring system in line with the requirements of the Principles & Criteria;
- Complete an internal assessment and establish a baseline to understand current farming practices and challenges within the Producer Unit, including consultations with farmers and relevant communities (refer to Principle 1 of the Principles & Criteria for specific requirements). If gaps are identified, the Producer must develop and implement corrective actions;

- Develop capacity strengthening materials and carry out cascade training to Field Facilitators, farmers and workers;
- Complete and submit to BCI the self-assessment (see [Section 2.9](#)), using the form or template provided by BCI;
- Collect, verify and submit to BCI the field-level Results Indicator reporting (RIR) data for a sample of farmers, as defined in the Farm Data Requirements document.

2.3.3 The Producer Unit shall establish its management system (see Principles & Criteria management indicators in Tables [14](#) and [15](#)), including the related capacity strengthening activities and monitoring systems.

2.3.4 Once the above activities are completed, the Programme Partner shall complete a Readiness Check of the Producer Unit using the template provided by BCI.

2.3.5 Readiness Checks should typically last at least two full days for a Smallholder PU and 1.5 days for a Medium Farm PU.

2.3.6 The Readiness Check must include:

- A meeting with the PU Manager and Field Facilitators to understand progress and identify key challenges and action plans;
- Individual interviews with at least 5 farmers from 3 different Learning Groups for Smallholders (15 farmers minimum), or 3 farmers for Medium Farms;
- Field observations at individual farms (minimum of 5 farms, but more farm visits are recommended);
- Worker interviews (whenever possible);
- Observing the PU Manager and Field Facilitators in their daily roles (for example, watching training sessions, farmer focus groups, or shadowing Field Facilitators on individual farmer visits);
- Individual interviews with the PU Manager and Field Facilitators to understand knowledge strengths and areas for improvement;
- A review of essential PU documents, including internal assessments, management plans, the continuous improvement plan, and training schedules and materials (for PU staff and LGs/farmers); and
- A closing meeting with the PU Manager and Field Facilitators to discuss findings, corrective actions, and any next steps.

2.3.7 The Producer Unit shall keep records of the above activities that are readily available.

2.3.8 Readiness Checks can be carried out any time from sowing to harvest during the initial set-up season or any time during the sowing period of the PU's second season.

2.3.9 The Producer Unit shall plan and implement corrective actions identified during the Readiness Check to assure readiness as per [Figure 2](#) before applying for certification. Please refer to tables [16](#) and [17](#) to see the definitions of grading types.

2.3.10 The Partner shall determine readiness for certification based on the decision tree in [Figure 2](#).

- Implementation of corrections may happen after the CB visit, and this may mean that an incidental non-conformity can still be raised.

2.3.11 The Partner shall confirm to BCI the Producer Units to go into certification by the end of sowing and provide to BCI a copy of:

- The readiness check report;
- Corrective action plans;
- Evidence of implementation of corrections, as relevant.

2.3.12 The Partner shall respond to queries from BCI relating to the Readiness Check:

- In the regions where BCI pays for certification costs, BCI reserves the right to not put a Producer forward for certification as per the decision tree in [Figure 2](#).

2.3.13 The partner may apply to BCI for a variation (see [Section 5.16](#)) to have a certification audit in the first season of a Producer Unit if all the following are met:

- The Producer Unit has been established well in advance of the current crop season;
- The Producer Unit Manager and all Field Facilitators have been hired and trained by the start of sowing;
- An internal/baseline audit on the Producer Unit has been completed by the Producer Unit Manager within 2 weeks of the start of sowing;
- Readiness is demonstrated as per [Figure 2](#).

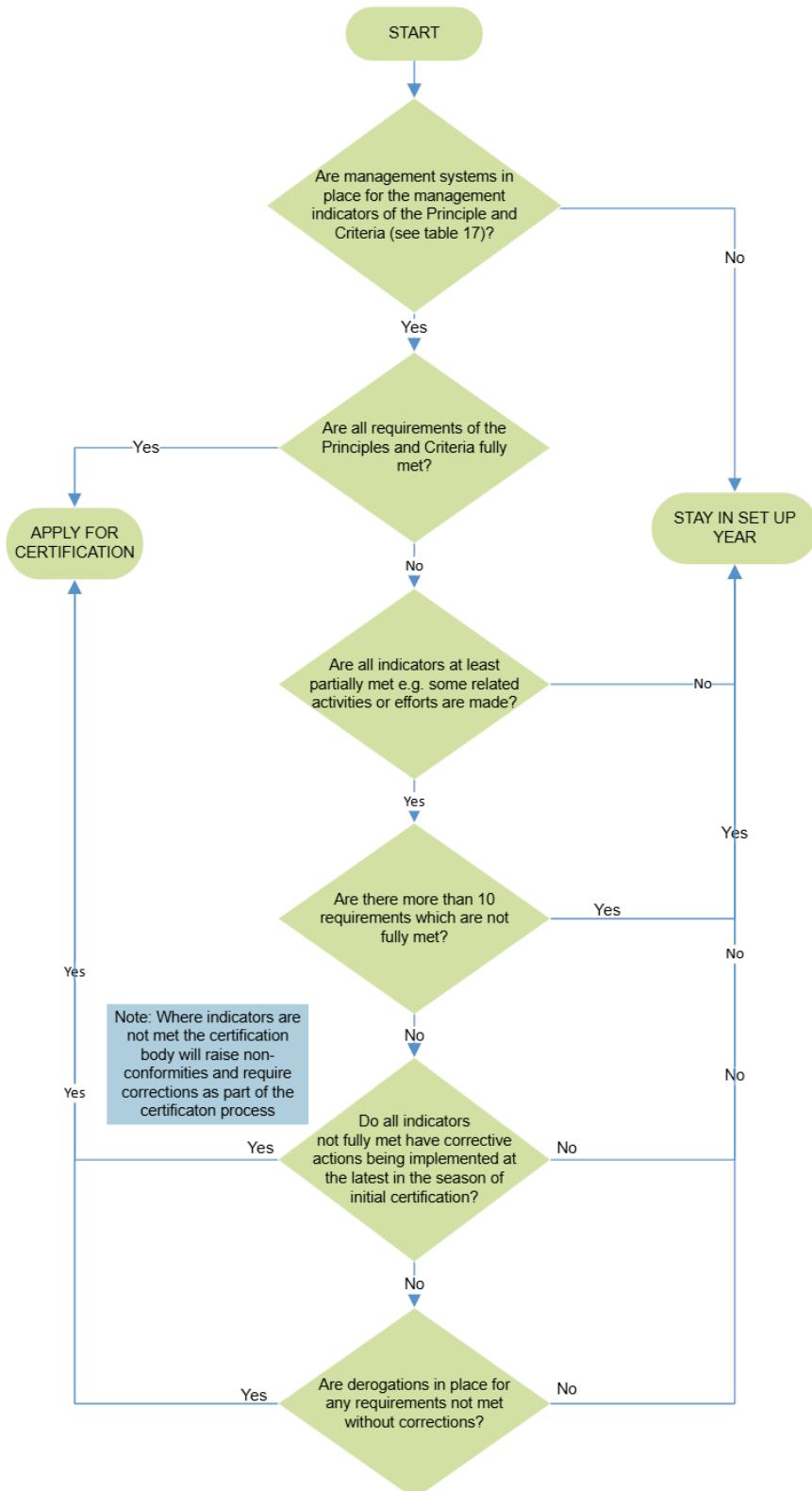


Figure 2: Determining Producer Unit Readiness to progress to certification.

## 2.4 Large Farm Requirements

### **Section 2.4 is NOT relevant to Producer Units**

2.4.1 Large Farms or Large Farm Groups who wish to participate in the BCI Programme shall register their participation with their local BCI Country Team by the end of sowing.

- If the Large Farm or Large Farm Group is not yet certified, they shall also submit the early season section of the self-assessment (part 1);
- For the US self-assessments, the self-assessment process is different. Please see more details in [Section 2.10](#).

2.4.2 Large Farms or Large Farm Groups shall adhere to the requirements set out in the BCI Principles and Criteria.

2.4.3 Large Farm Groups shall adhere to both:

- The requirements set out in the BCI Principles and Criteria;
- The requirements in [Section 3](#): Large Farm Group requirements in this document.

2.4.4 Large Farms and Large Farm Group management shall check they are compliant with the relevant requirements as above before applying for certification.

- Large Farms and Large Farm groups may use the self-assessment (see [Section 2.10](#)) process as part of this.

## 2.5 Training and Guidance

2.5.1 All Programme Partners, individual farms without partners and Large Farm Group Managers shall participate in the relevant capacity strengthening and training provided by BCI.

## 2.6 Producer Assurance Activities

2.6.1 Programme Partners, Producer Unit Management, Large Farm management and/or Large Farm Group management shall conduct the activities in [Table 4](#) at the seasonal timings defined and submit to BCI as required.

2.6.2 Programme Partners and Producers shall be responsible to assure the accuracy of the information they collect and submit.

Activity	Producer type	Start timing	End timing (deadline)
Confirm Producer data (as per Farm Data Requirements)	All	4 weeks before start of sowing	End of sowing
Submit farmer lists	Producer Units only	4 weeks before start of sowing	End of sowing (final confirmed farmer lists)
Internal assessment to inform self-assessment	Producer Unit only	Start of sowing (recommended timing)	End of harvest
Submit early season reporting	All	Start of sowing	End of sowing
Readiness Check visit	New Producer Units only	Start of sowing	End of harvest in set up year, or end of sowing in first year.
Submit 'Recommended for Certification' list of new Producer Units	New Producer Units only	N/A	End of sowing
Producer Unit Support visits	Certified Producer Units only	Start of sowing	End of harvest
Self-assessments – PUs	All PUs	When template provided by BCI	4 weeks after end of harvest
Self-assessment – LFs (excluding in the United States)	All LFs not in the USA	4 weeks before submission when survey shared	For new LFs, part 1 at the end of sowing, part 2 4 weeks after end of harvest. For existing LFs 4 weeks after end of harvest
Self-assessment – USA LFs	All LFs in USA	When survey sent	As defined by BCI when sending the survey
Submit results indicator reporting	All	Start of sowing	12 weeks after end of harvest (final confirmed results indicator reporting submitted)

Table 4: Timeline of Activities and Their Deadline for Submission to BCI.

## 2.7 Producer Monitoring Activities

2.7.1 Programme Partners, Producer Unit Management, Large Farm management and/or Large Farm Group management shall conduct ongoing first and second party monitoring activities, as detailed in Tables [5](#) and [6](#).

2.7.2 All data submissions shall be done in adherence of the [BCI Farm Data Requirements](#) and the documents referenced within, including [Working with Results Indicators](#).

Activity	Description	Applicability	Frequency triggers	Impact on Certification
Review of Readiness Check report	Assess compliance with the Principles and Criteria, identify gaps and support to close these gaps.	Producer Units only	Before Certification Body allocation in the initial certification year.	Findings available to Certification Body as supporting evidence of management system and/or reference. Not checked directly for compliance.
Support Visits	Monitor Producers compliance with the Principles and Criteria, identify gaps and support to close these gaps. Onsite unless a case of force majeure.	Producer Units only	During the cotton season and at least once during certification.	Findings available to Certification Body as supporting evidence of management system and/or reference. Not checked directly for compliance.

Table 5: Second Party Assurance by Programme Partners (with Support of Local Partners).

Activity	Description	Applicability	Frequency triggers	Impact on Certification
Self-assessment	Producers assess themselves against the Principles & Criteria and answer questions on their management system and improvement.	Large Farms and Producer Units	Annually, as per Sections <a href="#">2.9</a> and <a href="#">2.10</a>	Significant failure to identify issues later found by the Certification Body will result in non-compliance. Related to compliance with Indicator 1.1.2 of the Principles and Criteria for Producer Units and 1.1.4 for Large Farms

Internal assessment	Producer Unit management gathers information on compliance with the Principles and Criteria from at least 10% of Learning Groups or Medium Farms	Producer Units Only	Annually, as per <a href="#">Section 2.8</a>	As for self-assessment
Data submissions	As per the <a href="#">Farm Data Requirements</a>	Large Farms and Producer Units	Seasonally	Referred to Certification Body when relevant
Internal monitoring	As defined in Indicator 1.1.2 of the Principles & Criteria and including the data on risk of non-compliance from 10% of Learning Groups or Medium Farms as needed to complete the self-assessment.	Producer Units only	Seasonally	Considered in compliance with Indicator 1.1.2 of the Principles and Criteria
Internal audits	Management visits a sample of farms to audit against the Principles and Criteria	Large Farm Groups only	Annually	Significant failure to identify issues later found by the Certification Body result in non-compliance against the group management requirements

Table 6: First Party Assurance by Producers.

## 2.8 Producer Units Internal Assessment

### Section 2.8 is NOT relevant to Large Farms nor Large Farm Groups

2.8.1 Before completing the self-assessment at Producer Unit level, the Producer Unit Manager and Field Facilitators shall carry out an annual internal assessment, which shall include:

- Gathering information from at least 10% of Medium Farms or Smallholder Learning Groups, which helps identify any risks to non-compliance with BCI Principles and Criteria;

- Identifying current practices used by farmers: During the set-up phase, the internal assessment includes baseline (existing) farmer practices, which helps identify improvement priorities. After a Producer Unit is certified, the internal assessment includes assessing levels of farmer understanding and adoption of the practices promoted through training.

2.8.2 The Producer Unit Manager shall maintain a record of the internal assessment:

- This does not need to be submitted to BCI;
- Certification Body auditors may consider this record when auditing 1.1.2 of the BCI Principles and Criteria.

2.8.3 The Producer Unit Management may:

- Conduct the internal assessment as part of their ongoing monitoring activities as per 1.1.2 of the BCI Principles and Criteria;
- Use the template provided by BCI for internal assessments.

## 2.9 Producer Units Self-Assessments

**Section 2.9 is NOT relevant to Large Farms nor Large Farm Groups**

2.9.1 Producer Units shall complete an annual self-assessment using the Excel template provided by BCI in order to receive or maintain eligibility to trade BCI Cotton (see [Section 2.1](#)). One Self-assessment is completed per Producer Unit and is submitted 4 weeks after the end of harvest.

2.9.2 The objectives of the self-assessment are to:

- Ensure that Producer Unit self-monitoring is happening in between external audits;
- Support Producer Units in meeting Principle 1 requirements to conduct monitoring, consultation and annually review the activity plan (Indicators 1.1.1, 1.1.2, 1.1.3);
- Help auditors assess the quality of Producer monitoring (Indicator 1.1.2).

2.9.3 The self-assessment includes but is not limited to:

- Self-assessment against **the latest available version of** the Principles and Criteria requirements and identification of compliance gaps, and monitoring of how these are improved upon or resolved.

2.9.4 The Producer Unit should consider the following in completing their self-assessment:

- Internal assessment;
- Certification Body audit;
- BCI monitoring visits;
- Producer Unit Support Visits;
- Previous self-assessments and progress on actions;

- Labour monitoring and remediation system;
- Practice adoption;
- Results indicator reporting data.

2.9.5 The results of the self-assessment are not directly linked to certification outcome but may be used by Certification Bodies to assess the quality of Producer management and monitoring systems as per the BCI Principles and Criteria indicator 1.1.2.

- For example, if no gaps are identified in the self-assessments and several gaps are identified by Certification Body, the Certification Body is likely to raise a non-conformity against 1.1.2.

2.9.6 If the Producer Unit does not submit a completed self-assessment in admissible quality by the deadline, the Producer may lose their right to trade BCI Cotton (see [Section 5.14](#) on suspensions).

- In extenuating circumstances an extension request for more time to complete the self-assessment can be requested. Please refer to [Section 5.16](#) on variations.

## 2.10 Large Farm Self-Assessments

### **Section 2.10 is NOT relevant to Producer Units**

2.10.1 All Large Farms shall complete an annual self-assessment using the survey provided by BCI in order to receive or maintain eligibility to trade BCI Cotton (see [Section 2.1](#)).

2.10.2 The objectives of the self-assessment are to:

- Ensure that Producer self-monitoring is happening in between external audits;
- Support Large Farms applying for a certificate in assessing their level of preparedness for certification;
- Help auditors assess the quality of Producer monitoring (Indicator 1.1.4).

2.10.3 The self-assessment includes, but is not limited to:

- Self-assessment against the Principles and Criteria requirements and identification of compliance gaps, and monitoring of how these are improved upon or resolved.

2.10.4 The results of the self-assessment are not directly linked to certification outcome but may be used by Certification Bodies to assess the quality of Producer management and monitoring systems.

- For example, if no gaps are identified in the self-assessments and several gaps are identified by Certification Body, the Certification Body is likely to raise a non-conformity against Principles and Criteria Indicator 1.1.4.

2.10.5 BCI provides the survey to the large farms and requires its submission in the following timelines:

- For countries other than the United States, new Large Farms are required to submit the self-assessment in two parts, part 1 submitted early in the season (end of sowing) for auditors to look at it during the initial audit, and part 2 at the end of the season (4 weeks after the end of harvest), while existing Large Farms submit the full self-assessment at the end of the season (4 weeks after the end of harvest).
- For Large Farms in the United States, the self-assessment is submitted either in the enrolment or renewal version (for more information, please refer to the Farm Data Requirements document).

2.10.6 If the Large Farm does not submit a completed self-assessment in admissible quality by the deadline, the Producer may lose their right to trade BCI Cotton (see [Section 5.14](#) on suspensions).

- In extenuating circumstances an extension request for more time to complete the self-assessment can be requested, please refer to see [Section 5.16](#) on variations.

## 2.11 Producer Certification

2.11.1 Producers, or their related partners, shall apply to and contract with Certification Bodies as outlined in [Section 5.3](#) of this document.

- Producers or Strategic Partners that pay for certification may request quotations from all Certification Body approved by BCI for Producer certification.
- In cases where BCI pays for certification, the allocation of Certification Body is done by BCI.

2.11.2 Producers shall provide Certification Body with access to the following areas, when relevant: list of farms, people to interview and documents in order that the audits can be conducted as defined in [Section 5.5](#) of this document.

2.11.3 Producer Management or Group Management shall not be involved in the selection of the farms or Learning Groups to visit and should not be present during the interviews of farmers or workers. See [Section 5.5](#) for more details.

2.11.4 Producers shall conduct a root-cause analysis on any non-conformities found, confirming the corrective action plans and, where these relate to a change in adoption or awareness across farmers or workers, monitoring their implementation as outlined in [Section 5.7](#) of this document.

2.11.5 Producers shall inform Certification Bodies of any changes affecting their certification or its scope. For Producer Units, refer also to [Section 2.16](#).

2.11.6 Producers may appeal certification decisions as per [Section 5.10](#) of this document but may incur costs where appeals are unsuccessful, i.e. if the original certification decision is upheld as a result of the appeal.

2.11.7 Producers may appeal incidental non-conformities as per [Section 5.10](#) of this document but may incur costs per non-conformity in any case where the appeal is unsuccessful, i.e. if the indicator-level non-conformity is not downgraded as a result of the appeal.

2.11.8 The right to appeal should only be exercised when the Producer claims professional misconduct or negligence on the part of the auditor. This may apply to any of the following scenarios, where clear and objective evidence is available to support:

- A non-conformity was incorrectly identified
- Evidence was misinterpreted or overlooked
- The auditor applied the wrong version of the standard
- A requirement was outside the audit scope
- The auditor did not follow the scheme's audit protocol
- Insufficient time, sampling errors, or language barriers
- Conflict of interest or lack of impartiality.

2.11.9 Producers who pay for their certification may transfer between one Certification Body and another from the list of approved Certification Body (see [Section 5.15](#)).

2.11.10 Producers who wish to leave the programme may cancel their certification, and from this point will no longer be able to trade BCI Cotton until they re-join the programme as a new applicant and close out of any outstanding non-conformities.

2.11.11 Producers who are no longer participating in the BCI programme will have their certification cancelled.

## 2.12 Producer Unit Support Visits

### **Section 2.12 is NOT relevant to Large Farms nor Large Farm Groups**

2.12.1 Programme Partners shall conduct a field-based Producer Unit Support Visit on each Producer Unit in either the second or third year of their active certification period:

- These visits are designed to complement – not replace – regular monitoring and field visits by the Programme Partner to all the Producer Units under their management.

2.12.2 The aim of the Producer Unit Support Visit is to:

- Evaluate the Producer Unit's continuous improvement progress, identify challenges and develop solutions (together with the Producer Unit Manager and Field Facilitators);
- Review the effectiveness of the PU's internal management system and training/awareness raising efforts, and determine if any changes are needed;

- Verify whether the Producer Unit is still fully compliant with the Principles & Criteria Indicators, identify any gaps and agree on corrective actions to address them;
- Understand where the Producer Unit needs additional capacity strengthening support and training (including skills development or training of Producer Unit staff and farmers).

2.12.3 Producer Unit Support Visits should be conducted by any experienced member of the Programme Partner organisation who has undergone training in the BCI Programme from BCI or the Programme Partner.

2.12.4 Producer Unit Support Visits shall not be conducted by the Producer Unit Manager (or another staff member) of the same Producer Unit that is being assessed.

## Format and Timing

2.12.5 Producer Support Visits are field-based checks that should typically last at least 2 full days for a Smallholder Producer Unit and 1.5 days for a Medium Farm Medium Farm Producer Unit.

2.12.6 The Producer Unit Support Visit should include, at a minimum, the following elements (others may be included based on the judgement of the Programme Partner representative):

- A meeting with the Producer Unit Manager and Field Facilitators to understand progress and identify key challenges and action plans;
- Individual interviews with at least 5 farmers from 3 different Learning Groups for Smallholder (15 farmers minimum), or 3 farmers for Medium Farm Medium Farm;
- Field observations at a minimum of five individual farms (more farm visits are recommended);
- Worker interviews (whenever possible);
- A detailed review of Producer Unit documents, including the continuous improvement priorities, training records, adoption records, etc.;
- Cross-checking Producer Unit level documents (e.g. training and adoption records) with farmer interviews on a sample basis;
- Observing the Producer Unit Manager and Field Facilitators in their daily work, for example, observing training sessions or farmer focus groups, or shadowing Field Facilitators on individual farmer visits;
- Individual interviews with the Producer Unit Manager and Field Facilitators to understand knowledge strengths and areas for improvement;
- An audit of year-on-year progress in achieving continuous improvement targets and identification of any areas of challenge that require support;
- A closing meeting with the Producer Unit Manager and Field Facilitators to discuss findings, corrective actions and any next steps.

## Outcomes of Producer Unit Support Visits

2.12.7 After the visit, findings are reported using the Producer Unit Support Visit template provided by BCI.

2.12.8 The Programme Partner representative carrying out the Producer Unit Support Visit should complete the report and the detailed action plan and share back with the Producer Unit Manager within 3 weeks of the visit.

2.12.9 Copies of the Producer Unit Support Visit reports are to be shared with the BCI Country Team within 2 months of completion, or when requested.

2.12.10 If a Programme Partner determines at any time (including through a Producer Unit Support Visit) that a Producer Unit has significant gaps in meeting any of the Principles & Criteria Indicators, the Programme Partners shall notify the BCI Country Team and the Certification Body in writing of the issue.

2.12.11 This information will not lead to an automatic certification suspension but may result in an additional Surveillance audit being carried out.

## 2.13 Continuous Improvement for Large Farms

2.13.1 Large Farms shall set targets for continuous improvement to maintain certification as per the requirement of 1.3.2 of the BCI Principles and Criteria.

2.13.2 Large farms continual improvement shall go beyond basic compliance with the requirements of the Principles and Criteria.

2.13.3 Large farms shall:

- Identify key area where they can improve their sustainability impacts;
- Set sustainability targets;
- Monitor progress against these targets.

2.13.4 When setting continuous improvement focus areas and targets, large farms should consider:

- Local sustainability hotspots or priorities;
- Input from workers and/or community stakeholders;
- Gender and climate change issues.

## 2.14 Continuous Improvement in Producer Units

2.14.1 Producer Units shall identify focus areas for continuous improvement to maintain certification as per the requirements of 1.3.1 of the BCI Principles and Criteria.

2.14.2 Producer Units should consider sustainability areas that go beyond the Principles and Criteria.

2.14.3 Producer Units should in setting continuous improvement focus areas and targets consider:

- Local sustainability hotspots or priorities;
- Field-level consultation;
- Gender and climate change issues.

2.14.4 Producer Units shall integrate continuous improvement into their planning and monitoring systems as per 1.1.1 and 1.1.2 of the BCI Principles and Criteria.

2.14.5 Partners shall review continuous improvement as part of the Producer Unit Support Visits.

## 2.15 Applying for Variations, Exceptional Use and Derogations

2.15.1 Producers (or the Programme Partners overseeing Producer Units) wishing to deviate from any of the requirements in the BCI normative documents shall take action as follows:

- For deviations to the Principles and Criteria, a formal derogation request shall be submitted as defined in the BCI Derogations Policy. Cases in which the deviation relates to use of a highly hazardous pesticide (HHP), the Producer shall follow the Exceptional use Process instead;
- When the deviation relates to processes in this document or those related to it, the Producer shall submit a variation request to BCI;
- The Producer shall consult with, and gain approval, from their Certification Body prior to submitting the variation request if it relates to the certification processes in Section 5 of this document.

2.15.2 The variation request shall be made using the Online Variation Request Form. The request shall include:

- The requirement/Indicator from which the Producer is seeking to deviate from;
- The justification for the deviation;
- Where it relates to a certification process, the Certification Body approval shall also be uploaded as part of the variation request.

2.15.3 BCI shall review the variation and confirm the decision, as outlined in [Section 5.16](#).

2.15.4 Requests for timeline extensions of one month or less do not need to be submitted through the online form and can be communicated to BCI Country Teams directly, who will then review the request and confirm their decision as quickly as possible.

## 2.16 Changes to Producer Units

2.16.1 In the case of a Partner taking on a new Producer Unit, they shall:

- Review PU performance, normally by conducting a PU support visit and/or reviewing a copy of a recent CB audit report;
- Update their certification contract with the Certification Body, provide them with the evidence of the review and confirm any additional audit needs.

2.16.2 In the case of a Partner overseeing 2 PUs that merge, the Partner shall:

- Review the effective management of the reformed group, normally through a readiness check or a PU support visit;
- Update their certification contract with the Certification Body, provide them with the evidence of the review, and cooperate with any additional audit needs.

# 3. Large Farm Group Requirements

## 3.1 Introduction

3.1.1 This section outlines the procedure and requirements for the grouping of Large Farms under one BCI Certificate.

3.1.2 All aspects of this section are considered to be normative and shall be complied with by the group management and/or members, as applicable. These group certification requirements apply to the farmer/decision maker on the land that grows cotton applying for group certification to the BCI Principles and Criteria.

3.1.3 This group certification may be combined with group chain of custody certification. For chain of custody, the scope of certification is the storage and ginning of the cotton whilst under the ownership of the Large Farm farmer/decision maker.

3.1.4 The Large Farm Group certification is a model that allows for sample-based auditing (i.e. only a sample of farms to be audited) in the case where Group Management is in place and the workforce is small. For farms with a large workforce, it is important to audit every farm due to the greater risks to worker rights and the number of people needing to be trained in practice adoption.

3.1.5 Sections [3](#) and [5](#) of this document are also applicable. Please note that requirements for Producers include Large Farm Groups.

## 3.2 Scope

3.2.1 The scope of certification is as defined in [Section 5.2](#).

## 3.3 Eligibility

3.3.1 The eligibility requirements are defined in [Section 5.1](#).

## 3.4 Group Manager Requirements

## Application and Certification Contract

3.4.1 The Group Manager shall apply for certification from a Certification Body approved by BCI for certification to the BCI Principles and Criteria and for certification to the CoC Standard, if applicable.

- The Group Manager shall agree and confirm the list of participating farms to the Certification Body (see also [Section 5.3](#)).

3.4.2 An authorised representative of the Group Manager shall sign the certification contract with the Certification Body.

3.4.3 The Group Manager shall confirm a main contact for the Certification Body and update the Certification Body if this changes.

## Management System

3.4.4 The Group Manager shall demonstrate it has the management system and resources to assure compliance of the individual farms.

- The management system needs to include the following, as defined in this document: written agreement with individual farms, engagement and outreach activities, data collection and submission to BCI, internal audit, management review, individual farm's details list, correction of non-conformities and processes to add and remove farms to the group.

3.4.5 The Group Manager shall ensure the individual farms comply with these requirements and the BCI Principles and Criteria and, where applicable, Chain of Custody Standard.

## Engagement and Outreach

3.4.6 The Group Manager shall engage all participating farms in the group to ensure:

- Information from BCI, such as updates on the programme and its requirements or information on BCI events, is shared with individual farmers, as required;
- The participating farms understand the BCI Principles & Criteria Indicators and develop/implement continuous improvement targets and, where relevant, the Chain of Custody Standard.

## Individual Farm Agreements

3.4.7 The Group Manager and individual farms shall be linked through a written agreement that includes:

- The individual farm's commitment to comply with the BCI Principles and Criteria and, when relevant, the Large Farm Group certification requirements.
- The Group Manager's right to exclude any individual farm in the case of serious non-conformity or failure to plan and/or implement corrective actions.

## Data Collection and Submissions

3.4.8 The Group Manager shall assure timely submission to BCI of the following information:

- Data, as defined in the [BCI Farm Data Requirements](#);
- BCI self-assessment submissions;
- Large Farm registration documents.

## Internal Audit

3.4.9 The Group Manager shall organise an annual internal audit of a sample of farms.

3.4.10 The sample size shall be at a minimum the square root of the number of individual farms, rounded up to the nearest whole number.

3.4.11 The internal audits shall be done onsite at the farm.

3.4.12 The Group Manager shall have a method to determine how sampling can be representative of the individual farms, considering the risk factors in [Section 3.7](#).

3.4.13 The Group Manager shall avoid assessing the same individual farms for consecutive internal audits, unless there is clear justification to do so.

3.4.14 The Group Manager may consider risk factors in how they select the farms to internally audit and/or if the sample size needs to be increased (see [Table 3](#)).

3.4.15 The Group Manager may randomise a portion of the sample due for internal audit.

3.4.16 A competent individual or team shall conduct the internal audit of each selected individual farm.

3.4.17 The internal auditor shall assess each Large Farm against the following criteria:

- The BCI Principles and Criteria;
- Individual Large Farms requirements (see [Section 3.5](#));
- Own internal management system, including self-assessments completed and correction of any findings;
- Protocol for Producers with subcontracted gins within the [BCI Chain of Custody Monitoring and Certification Requirements](#) for chain of custody, if relevant.

3.4.18 The Group Manager shall share the result of their internal audit with their Certification Body **every year at a time agreed with their Certification Body**.

## Management Review

3.4.19 The Group Manager shall carry out an annual management review that includes, as a minimum, the following information:

- Outcomes of the internal audit, including non-conformity correction status;
- Any changes affecting the group, such as:
  - BCI Principles and Criteria or related derogations;
  - Individual Farms leaving/joining the group;
  - Exceptional circumstances, such as climatic conditions or pest pressures.

3.4.20 A record of the management review shall be retained and provided to the Certification Body.

## Correction of Non-Conformities

3.4.21 The Group Manager shall take actions to control, correct and address consequences of any non-conformities, including:

- Determining the cause;
- Planning and implementing corrective actions and preventative measures, and assessing their effectiveness.

3.4.22 Where these are raised by the Certification Body, the above actions shall be completed within the required timeframe [as per Section 5.7](#).

## List of Individual Farms and Changes

3.4.23 The Group Manager shall maintain a list of associated farms, including, as a minimum, the following information for each farm:

- Name of farmer;
- Phone number;
- Email (if available);
- Farm name;
- Cotton acreage;
- Date farm joined the certificate.

3.4.24 The Group Manager shall have a process for adding farms to the group that includes, as a minimum, the following actions:

- The Group Manager provides the individual farm management with the BCI farmer introduction;
- The individual farm management completes and submits the BCI self-assessment to BCI;
- The individual farm management confirms they are not listed on any other BCI group certificate.

3.4.25 Where the farm has outstanding non-conformities, the Group Manager shall ensure these are corrected before adding the farm to the certificate.

3.4.26 The Group Manager shall have a process for removing individual farms from the group that shall meet, as a minimum, any of the below criteria:

- Individual farms with non-conformities found during an internal audit that show a fundamental failing of farm management and/or failure to correct non-conformities following a previous internal audit;
- Individual farms that choose to leave the group certificate.

3.4.27 The Group Manager shall notify the Certification Body and BCI within 10 days of any individual farms joining or leaving the group certificate.

3.4.28 The Group Manager shall inform BCI and the Certification Body in case of any changes to the Group Manager contact.

## Achieving and Maintaining Certification

3.4.29 The Group Manager shall ensure that, in the case of systemic non-conformities, no cotton is sold as BCI Cotton from the affected farms after the date of withdrawal.

3.4.30 The Group Manager shall ensure that all non-conformities are corrected.

3.4.31 The Group Manager shall cooperate with all surveillance activities.

## 3.5 Individual Farm Requirements

3.5.1 Individual farms shall comply with requirements, submit information to BCI and take on responsibilities as defined in [Section 2](#) of this document. This includes that they have responsibility for:

- Reviewing all compliance gaps identified by the self-assessment and ensuring these are addressed in a timely manner;
- Implementing corrective and preventative measures found during internal or certification audits.

3.5.2 Individual farms within a Group Certification shall also:

- Sign an agreement with the Group Manager as per [Section 3.4](#);

- Fully co-operate in responding to requests from the Group Manager for documentation and farm access, as relevant to these requirements;
- Inform the Group Manager at time of joining the group if they have been part of any previous BCI certification and of any outstanding non-conformities;
- Inform the Group Manager of any changes that affect their certification, including, as a minimum, the following scenarios:
  - Years/seasons they are not growing cotton;
  - Decision to leave the group certificate;
  - If they are leaving the group certificate before joining and being listed on a different group certificate;
  - If the number of workers on the individual farm exceeds 30 personnel.

## 3.6 Certification Body Requirements

3.6.1 Certification in the Large Farm Group model is an assessment and confirmation of compliance to Large Farm Group Management requirements, the BCI Principles and Criteria and where relevant to the Protocol for Producers with Subcontracted Gins.

### Audit

3.6.2 The Certification Body shall assess the Group Manager and a sample of farm sites as a minimum once every 3 years.

3.6.3 All assessments are conducted on site.

3.6.4 The Certification Body shall evaluate the ability of the Group Manager to manage the individual farms of the certificate.

3.6.5 The audit shall include all applicable activities outlined in [Sections 5.4–5.8](#), including reporting.

### Non-Conformities and Corrections

3.6.6 The Certification Body shall raise and action non-conformities found during the assessment, as stated in [Section 5.7](#) and in the [P&C Monitoring and Certification Requirements](#), and verify their close out as per [Section 5.7](#).

### Assessment Reporting and Decisions

3.6.7 The Certification Body shall produce an assessment report using the BCI Principles and Criteria assessment report template within the timelines laid out in [Section 5.7](#).

## Certification Decisions

3.6.8 The Certification Body shall take the decision on certification as per Sections [5.7](#) and [5.8](#), for Principles and Criteria scope, and as defined in the [Chain of Custody Monitoring and Certification Requirements](#), for chain of custody scope.

3.6.9 When certification is issued, the Certification Body shall issue a certificate to the Group Manager.

3.6.10 The certificate shall include a list of associated individual farms, as per the example in [Annex 2](#).

3.6.11 The certificate shall be valid for 3 years from issue, but with an extra year in the first certificate cycle for permission to trade or certification as per [Section 5.7](#) of this document.

3.6.12 After the 3 years, a full onsite renewal audit is required to maintain certification.

## Changes to the Certificate

3.6.13 The Certification Body shall update their certificate and notify BCI within 10 days of any individual farm leaving or joining the group.

## Annual management checks

3.6.14 The Certification Body shall check the group management annually but only in the years between full audits.

3.6.15 This may be done remotely.

3.6.16 During annual management check of the Group Manager, the following shall be assessed as a minimum:

- The list of associated farms;
- The rate of change of associated farms (new farms, farms that have left the certificate);
- The capacity of the Group Manager's management system to manage any change in size of the group, including any increase in size, number or complexity of farms within the scope of the certificate;
- Records of the Group Manager's internal audits;
- Records of any corrective action requests issued by the Group Manager, including follow-up and close-out evidence;
- Records of the annual management review.

3.6.17 A report of the annual management check can be produced in the Certification Body own format.

3.6.18 If non-conformities are identified in the annual management check, the processes outlined in Sections [5.7](#) and [5.8](#) shall be followed, for Principles and Criteria scope, and in relevant sections of Chain of Custody Monitoring and Certification Requirements, for chain of custody scope.

## Surveillance audit

3.6.19 In the following cases, the Certification bodies may conduct an onsite Surveillance audit, including both Group Manager and a sample of individual farms:

- An increase of over 33% in the number of individual farms in the group;
  - As a minimum, the farm sample used in the audit will equal the square root of the new farms added;
- Investigation of a complaint or incident raised by BCI or other relevant stakeholders;
  - As a minimum, the farm sample will include the farms relating to the investigation.

3.6.20 For onsite Surveillance audits, the Certification Body shall include the activities outlined in Sections [5.6](#) and [5.12](#), for Principles and Criteria scope, and relevant sections of Chain of Custody Monitoring and Certification Requirements, for chain of custody scope, including reporting.

## Renewal audit

3.6.21 After 3 years following the closing meeting of the initial audit, the renewal audit is due as per the requirements in [Section 5.13](#) of this document.

# 3.7 Risk Factors to Consider in Sampling

3.7.1 The following areas should be considered as increasing the risks associated with certification:

- Previous non-conformities or suspensions;
- Presence of temporary and/or migrant workers;
- Use of any highly hazardous pesticides approved for exceptional use.

3.7.2 The following areas should be considered as reducing the risks associated with certification:

- Participating in Natural Resources Conservation Service programmes;

- Organic certification;
- US Cotton Trust Protocol assessed;
- RegenAgri certification;
- Other certifications;
- Regional/state controls that align with the BCI Principles and Criteria (e.g. controls in the state of California, USA, that reduce risk).

# 4. BCI Oversight

## 4.1 Producer Monitoring and Certification Model Updates

4.1.1 BCI periodically reviews the Producer monitoring and certification model to ensure it continues to deliver on its objectives (as outlined in [Section 1](#)), driving opportunities for continuous improvement and maintaining credibility.

- When significant updates are proposed, there will be proactive communication and dedicated consultation opportunities with key stakeholders, including Producers, Programme Partners and Certification Bodies, as well as others;
- A schedule of the proposed major changes and opportunities for stakeholder consultation will be made public on the BCI Assurance website;
- Minor changes to the model (which do not fundamentally change the assurance mechanisms and do not have notable implications on cost, credibility, certification or accessibility) can be made by the BCI Assurance team, after consultation with affected stakeholders; these changes require the approval of the Director of Standards and Systems Integrity;
- Final approval for major changes to the model rests with the BCI Council, which is a multi-stakeholder body elected from the BCI Membership.

4.1.2 Feedback or suggestions relating to the BCI Producer monitoring and certification model can be submitted at any time to [compliance@bettercotton.org](mailto:compliance@bettercotton.org) – any emails sent to this inbox will receive written responses and will help inform the schedule of future updates.

4.1.3 When a new version of the Producer Monitoring and Certification Requirements is published, the following steps will be taken:

- The requirements will be made available on the BCI website;
- Regional teams and Programme Partners will be informed about the update;
- For minor changes, the date of publication on the website will be the date for which the changes come into effect;
- For major changes, i.e. those that fundamentally change the assurance mechanisms and/or have notable implications on cost, credibility, certification or accessibility:
  - An effective date for the changes will be agreed and included in the Producer Monitoring and Certification Requirements based on communication and transition needs. This will be at least 30 days after the publication of the manual;
  - Programme Partners will be requested to inform the Large Farms or Producer Units they work with about any changes that impact them sufficiently in advance of the effective date.

## 4.2 Producer Model Oversight

4.2.1 External oversight activities are conducted as part of periodic system reviews at least once every 3 years:

- A delay to this may be considered if other oversight activities are conducted in the same year (e.g. ISEAL assessment or accreditation body approval).

4.2.2 External oversight activities are conducted by independent consultants. BCI will request any conflict of interests to be disclosed before proceeding with the selected independent consultant/body.

4.2.3 Further details of BCI's oversight mechanism are outlined in the Assurance Model System Review documents available on the Assurance page of the BCI website.

## 4.3 Interactions with Certification Bodies

The following requirements are in addition to the requirements listed in sub-sections 3 and 13 of the [General Certification Requirements](#).

4.3.1 BCI shall provide training to the Certification Body on how to audit to the Principles and Criteria and Large Farm Group requirements and respond to related queries sent to [compliance@bettercotton.org](mailto:compliance@bettercotton.org).

4.3.2 BCI shall provide relevant background information to the Certification Body for the Producers they are responsible for auditing and certifying. This will occur at least once per season and take place ahead of the relevant assessment. The information sent shall include but is not limited to:

- Derogations within the [BCI Active Derogation List](#);
- Exceptional use cases for Highly Hazardous Pesticides within the [BCI HHP Exceptional Use Decisions](#);
- List of highly hazardous pesticides from the [BCI HHP List](#) that are present in the region and, when relevant, their common product names;
- Self-assessment of the Producer;
  - For Large Farm Groups, this will be for each individual farm within the group;
  - Any variations that have been approved for the Producer;
- If it is the Producer's first audit, completed Readiness Check;
  - If it is not the Producer's first audit, previous audit reports, including corrective action plans;
  - Any records of corrective action implementation;
  - Summary of results indicator reporting data.

## 4.4 BCI Monitoring Activities

The following requirements are in addition to the requirements listed in sub-sections 3, 13 and 15 of the [General Certification Requirements](#).

4.4.1 BCI shall, on a sample basis and in consideration of the risks and representativeness, monitor Producers' compliance with the Principles and Criteria and Certification Bodies' compliance with the requirements listed in this document (see Table 7 below for a breakdown of some the activities).

Activity	Description	Applicability	Frequency triggers	Impact on Certification
BCI Readiness Check	Audit against the Principles and Criteria or a selection of indicators. Normally completed onsite.	Large Farms in countries with recent history (within past 20 years) of state-enforced labour. BCI also reserves the right in other high risk cases, and where BCI pays.	Only ahead of their initial certification audit.	Findings will be shared with Certification Bodies. If there is a risk of systemic or high level of incidentals the Certification Body may either choose not to proceed with certification and/or raise equivalent findings at the certification audit. BCI reserves the right not proceed with certification payment agreement if it is unlikely the producer will achieve certification or permission to trade.
BCI monitoring	Various monitoring activities. Could be a partial onsite audit to the P&C or other targeted monitoring.	All Producers and Certification Bodies	During the certificate cycle, BCI will select a sample to visit for targeted monitoring. This selection will consider risk and range.	Findings will be shared with Certification Bodies. If there is a risk of systemic or high level of incidentals, the Certification Body may either raise a corrective action plan or arrange a surveillance visit.

Additional field visits	Range of monitoring activities outside of compliance checks.	Producer Units only	As relevant to the related project.	Information can be escalated in case of allegation/compliance concern.
Certification Body shadowing	To observe Certification Bodies audits	All Producers and Certification Bodies	First audit of all new lead auditors and for an ongoing risk-based sample.	Poor performance by the auditor could mean a need for another audit.
Draft audit report reviews	Document review and feedback on Certification Body draft audit report	All Producers and Certification Body	Draft Certification Body audit reports reviewed ahead of the issue of non-conformities Any audit report can be selected for sample based on risks, such as major programme changes, new Certification Bodies	Decisions on certification still sit with the Certification Body. BCI can identify points of report writing clarity and consistency to the Certification Body.
Final audit report reviews	Document review of Certification Body audit report	All Producers and Certification Body	On a sample basis for each Certification Body each season	No impact on certification. Outcomes may identify Certification Body training needs or performance reviews.

Table 7: BCI Monitoring Activities.

4.4.2 BCI shall use GIS technology to identify risks of land conversion in the regions of BCI Producers and share these risk areas with:

- the Producers impacted to help them plan their monitoring activities
- the relevant Certification Bodies if there is an audit due to help them plan the audit.

## 4.5 BCI Cotton Volume Release

4.5.1 BCI shall determine regional BCI Cotton volume release dates, which are the dates upon which BCI Cotton volume codes are provided to eligible Producers to allow them and their associated gins to trade their cotton with a BCI claim.

- The volume release dates shall be communicated to the CBs at least one month ahead

4.5.2 BCI shall assign the volume amount based on the seasonal data provided to BCI by the Producers, as detailed in the Farm Data Requirements document. Further details on this process are available in [Section 5.9](#) of this document.

4.5.3 BCI shall provide the volume codes to each Producer upon the completion of the following actions:

- Acquisition of valid certification or permission to trade;
- Eligibility as per [Section 5.1](#) and, if relevant, [Section 3.3](#).

4.5.4 BCI maintains the right to withhold volumes in the following circumstances:

- Related issues that bring BCI into disrepute;
- Unethical behaviour or deliberate fraud.

## 4.6 Review of and Decision on Variations

4.6.1 The BCI team shall review the variation request and provide a response to the Producer as well as their respective Certification Body.

- The response shall include any conditions and timeframe for the deviation;
- For variations relating to certification process, BCI shall confirm that Certification Body approval has first been obtained.

4.6.2 If approved, the variation request shall not necessarily create a precedent; so, if a similar situation arises for the Producer in the future, they shall be required to submit another variation request.

4.6.3 BCI shall determine if the scenario could apply to multiple Producers and in such circumstances BCI shall consider if the process document itself should be updated to reflect this.

## 4.7 Oversight of Benchmarked Countries

4.7.1 BCI determines equivalence of other Producer standards and assurance schemes based on the [BCI Benchmarking Policy](#). Products certified or approved under these schemes can then be eligible to be traded as BCI and ultimately bear the BCI claim.

4.7.2 For schemes that are benchmarked as equivalent, BCI conducts some oversight of the Producer-assurance activities, which can include but are not limited to:

- Review of audit reports;
- Shadowing audits.

## 4.8 BCI Rights

4.8.1 BCI reserves the right to issue and amend the content and requirements stated in this document or any other normative documents that relate to the BCI Producer certification programme. All Producers shall be informed of any changes and shall be given a timeframe to implement those changes as per [Section 4.1](#).

4.8.2 The BCI Principles and Criteria are a voluntary standard that Producers may opt in to. BCI is not liable towards Producers for any direct or indirect damages arising out of or in connection with the issuing or not issuing of BCI Cotton volumes for any reason, unless the damage arises out of or in connection with BCI's intentional or gross negligent conduct.

## 4.9 Publicly Available Information

4.9.1 BCI shall make available information relating to Producers who are within the programme, and their current certification and past licensing statuses. This will include licensees withdrawn in the past 5 years, including the date of withdrawal.

- This includes: The producer/ programme partner name, code, state/ province, country, standard they are certified/ have permission to trade to, certification/ permission to trade status, expiry date of this.

# 5. Certification Body Process

## 5.1 Eligibility

### Eligibility for Certification and Trade of BCI Cotton

5.1.1 Producers shall only be eligible to apply for certification and, if successful, have an ongoing right to trade BCI Cotton if they meet the below requirements:

- Located in one of BCI's Producer countries: [Where BCI Cotton is grown - Better Cotton Initiative](#);
- Participating in the BCI programme;
- Covered by BCI due diligence requirements if relevant (through a direct agreement or other mechanism);
- Allow access for BCI for Readiness Checks, if relevant, and respond to any requests for information;
- Meet the eligibility requirements by Producer type, as detailed in Table 8 below.

5.1.2 Certification Bodies may only accept for certification Producers who meet the requirements in Section 5.1.1 above.

5.1.3 Certification Bodies shall confirm if the gins are service providers to the producers.

- In situations where the Producer, associated partners or farms within the Producer unit own the cotton through the ginning process, Certification Bodies shall also follow the requirements in protocol for Producers with Subcontracted Gins within BCI's Chain of Custody Monitoring and Certification Requirements (on the BCI [Certification webpage](#)).

Producer Type	Requirements for Initial Audit	Ongoing Requirements for Right to Trade BCI Cotton
Producer Units	<ul style="list-style-type: none"> <li>• Programme Partner has an agreement with BCI and any due diligence requirements are met;</li> <li>• Producer Unit completes all Producer Unit set-up requirements;</li> <li>• Programme Partner completes an onsite Readiness Check and determines the Producer Units ready for certification (see relevant section);</li> </ul>	<ul style="list-style-type: none"> <li>• Complete annual self-assessment;</li> <li>• Submit annual results indicator reporting data;</li> <li>• Programme Partner completes Producer Unit Support Visit;</li> <li>• Programme Partner maintains partnership agreement with BCI and any related due diligence is met;</li> <li>• Allow access for BCI monitoring visits and respond to BCI's requests for information.</li> </ul>

	<ul style="list-style-type: none"> <li>Allow BCI readiness check if relevant based on risk (e.g. previous failed audit).</li> </ul>	
Large Farms	<ul style="list-style-type: none"> <li>Complete self-assessment;</li> <li>Have received a BCI Readiness Check, if relevant (as defined in <a href="#">Table 7</a>).</li> </ul>	<ul style="list-style-type: none"> <li>Complete annual self-assessment;</li> <li>Submit annual results indicator reporting;</li> <li>Agreement with BCI, or is overseen by a BCI partner (between 2025-2028 there is an allowance for farms to transition to this);</li> <li>Allow access for BCI monitoring visits and respond to BCI's requests for information.</li> </ul>
Large Farm Groups	<ul style="list-style-type: none"> <li>Complete self-assessment;</li> <li>Group Manager has implemented management and internal audits across all farms, as per <a href="#">Section 3.4</a>;</li> <li>Individual farms in the group all have under 30 workers;</li> <li>Individual farms all have a fully mechanised harvest, i.e. no people manually pick cotton.</li> </ul>	<ul style="list-style-type: none"> <li>Complete annual self-assessment;</li> <li>Submit annual results indicator reporting data;</li> <li>Individual farms in the group all have under 30 workers and a fully mechanised harvest;</li> <li>Group Manager who has an agreement with BCI;</li> <li>Allow access for BCI monitoring visits and respond to BCI's requests for information.</li> </ul>

Table 8: Eligibility for Certification by Producer Type.

## 5.2 Scope

The scope of certification can be defined as: Growing, harvesting and storage of cotton on the land owned or leased by the farmers within the producer to the BCI Principles and Criteria, and where relevant the Large Farm Group requirements and/or Protocol for Producers with Subcontracted gins (within the CoC Monitoring and Certification Requirements).

## 5.3 Allocation, Application and Agreement

### Producer Application and Certification Body Allocation

5.3.1 Only Certification Bodies approved by BCI may issue certification to the BCI Principles and Criteria.

5.3.2 Certification Bodies may be selected by the Producer or allocated by BCI as outlined in Table 9 below. **In those cases where it is not BCI that allocates the Certification Body, the Certification Body shall notify BCI whenever they receive a new application.**

5.3.3 Once the Certification Body has been allocated, the application process can begin.

5.3.4 Certification Bodies shall inform BCI within 10 days of receipt of an application.

5.3.5 BCI shall then confirm the Producer's eligibility before the application can progress and inform the Certification Body if the Producer is still within their minimum withdrawal period as defined in [Section 5.14](#) or has any previous non-conformities to close out.

5.3.6 The Certification Body shall follow sub-section 14 of the [General Certification Requirements](#) when handling an application and sub-section 20 of the [General Certification Requirements](#) when handling a transfer or previously certified Producer.

5.3.7 All Certification Bodies are required to provide quotations to interested parties upon request, including BCI where relevant.

5.3.8 The Certification Body shall additionally request the necessary information to further assure eligibility of the Producer as per [Section 5.1](#).

- The Certification Body shall not accept an application if eligibility is not assured;
- The Certification Body shall additionally request, in the case of Producer application, the information as listed in Table 10 below.
- If the Producer applying previously went through an initial audit and did not pass it, the Certification Body shall check their CAPs to assure eligibility.

5.3.9 The Certification Body can access a Producer profile in the BCI audit information exchange platform (i.e. INTACT) once the allocation process has been completed.

BCI Country of Operation	Producer Type	Allocation	Payment for Certification
Egypt	Any producer	Strategic Partner selects the Certification Body from the BCI list of Certification Bodies approved in that country and commissions the certification audit directly.	Strategic Partner pays the certification costs through a direct agreement with the Certification Body.
Cote D'Ivoire and Benin	Any producer	Programme Partner selects the Certification Body from the BCI list of Certification Bodies approved in that country and commissions the certification audit directly.	Programme Partner pays the certification costs through a direct agreement with the Certification Body.
Türkiye	Producer Units	BCI allocates the Certification Body to the Producers in consultation with the Strategic Partner. Strategic Partner	Strategic Partner pays the certification costs through a direct agreement with the Certification Body. BCI

		commissions the certification audit directly.	provides the relevant funding to the Strategic Partner.
Pakistan, Türkiye, Uzbekistan	Large Farms	Large Farm and Large Farm Groups select their Certification Body from those approved by BCI in the region and commission the certification audit directly.	Individual Large Farms or Large Farm Group managers pay the certification cost through a direct agreement with the Certification Body.
China, India, Mali, Mozambique, Pakistan	Producer Units	BCI allocates the Certification Body to the Producers and commissions the certification audit directly.	BCI pays the certification costs for Producer Unit through a direct agreement with the Certification Body.
United States	Large Farms	Large Farm or Large Farm Groups select their Certification Body from those approved by BCI and commission the certification audit directly.	Individual Large Farms or Large Farm Group managers pay the certification cost through a direct agreement with the Certification Body.

Table 9: Certification Body Allocation and Contracting.

Producer Type	Additional Information
All	<ul style="list-style-type: none"> <li>Languages spoken locally as relevant to the labour profile of the Producer.</li> </ul>
Producer Units	<ul style="list-style-type: none"> <li>Programme Partner name and contact information;</li> <li>Name of project and Producer Unit code;</li> <li>List of farmers;</li> <li>Producer Unit Manager name and contact information;</li> <li>Copy of the completed self-assessment;</li> <li>Copy of the completed Readiness Check, including confirmation of completed corrective actions or, when relevant, planned in the upcoming season;</li> <li>Information on regional risks and/or relevant external sources to consult;</li> <li>Labour profile information.</li> </ul>
Large Farm Groups	<ul style="list-style-type: none"> <li>Large Farm Group Manager name and contact details;</li> <li>List of individual farms included in the group, including the following information: farm manager name and contact details, farm address and farm acreage.</li> </ul>

Table 10: Information to be Requested Upon Producer Application (additional to sub-section 14 of the General Certification Requirements).

## Certification Agreement

5.3.10 The Certification Body shall use a certification agreement, which follows the requirements list in sub-section 14 of the [General Certification Requirements](#).

5.3.11 For agreements relating to Producer certification, the contract shall also define that the Producer shall adhere to the relevant requirements in the BCI Principles and Criteria, Principles and Criteria Monitoring and Certification Requirements and where relevant BCI Protocol for Producers with Subcontracted Gins.

5.3.12 All certification agreements between the Certification Body and the Programme Partner should be finalised at least one month before the start date of the Certification Body's audits for the season.

## 5.4 Preparing for Audits

5.4.1 The Certification Body shall notify BCI of the scheduled audit at least 3 weeks prior to it taking place, and normally at the start of the season.

- BCI shall confirm which, if any, reports are to be sampled at the draft report stage.

5.4.2 The Certification Body shall follow sub-section 15 of the [General Certification Requirements](#) when preparing for the audit.

5.4.3 The Certification Body shall assign an auditor/audit team to the Producer who fulfils the following requirements:

- The auditor or included within the audit team are:
  - relevant competence/ experience for the audit
  - the relevant languages or assistance of a translator
  - training in social auditing aligned with Annex 4 if the audit includes farms with more than 30 workers
  - women if required to enable interviews of women workers and if the audit includes farms with more than 10 women workers.
- The auditor or, if it is a team, all members of the audit team, have:
  - signed the code of conduct
  - no conflicts of interest or, if they do, have declared them with relevant mitigations in place.
- The lead auditor shall meet the BCI lead auditor competency, be registered with BCI, have completed BCI training and, when relevant, have passed the exam (Producer and/or Supply Chain, as relevant).

5.4.4 If leading a BCI audit for the first time, the auditor shall be shadowed by BCI.

5.4.5 The Certification Body shall ensure it has sufficient resources to conduct the technical review and certification decision;

- The technical reviewer/decision maker shall be different to the assigned assessor;
- This person/s shall be appropriately competent and have no conflicts of interest, or any conflicts mitigated.

5.4.6 The Certification Bodies auditor/team shall consider the following information when planning the onsite audit:

- The Producer's history, including self-assessment, previous audit reports, **BCI producer monitoring assessment reports**, corrective action plans and correction evidence, when relevant;
- Other background information provided by BCI as relevant (see [Section 4.3](#)).

5.4.7 The Certification Bodies auditor/team may reach out to local sources as feasible (see [Section 5.6](#)).

## Producer Unit Initial Audit Preparation Only

This does not include those transferring from licensing.

5.4.8 For initial audits, the auditor should do a document review ahead of the onsite audit. This shall consider the robustness and strength of the management and monitoring system in place and shall include a review of the following documents:

- Readiness Check and related corrections;
- Activity plan;
- Monitoring plan;
- Consultation records;
- Labour monitoring and remediation system documentation;
- Records of capacity-strengthening activities;
- **Self-assessment.** ~~Self-declaration that no land on which cotton is grown has been converted from a natural ecosystem since the start of 2021 (except in the US where other records on land use since 2021 are checked for large farms).~~

5.4.9 If the auditor identifies that it is likely that the Producer Unit will not meet the compliance thresholds to achieve certification (see Tables [20](#), [21](#) and [22](#)), they shall communicate to the Certification Body decision maker who, if in agreement, shall contact the Producer and party paying for certification (if different) to recommend not to proceed with an onsite audit. In this case, BCI reserves the right to not proceed with an audit where BCI is the payer.

5.4.10 If documents are not submitted in time, the audit may need to be postponed or withdrawn. This may affect the feasibility to take a decision on certification ahead of the BCI Cotton volume release date.

## 5.5 Audit Planning

5.5.1 The Certification Body shall ensure that sufficient time and resources are allocated to the audit process for personnel to carry out the assigned tasks. This covers time for the auditor to effectively perform the audit activities, including but not limited to:

- Audit preparation;
- Execution and/or reporting activities to collate all the evidence required to deliver an accurate audit report. If interpretation is required, this shall be arranged in advance.

5.5.2 The Certification Body shall consider the geographical region, size and complexity of the Producer to determine the number of days required for an audit.

5.5.3 The auditor shall ensure that they complete the audit in its entirety, even if this means taking longer than the estimated time.

5.5.4 The Certification Body shall plan the timing of the audit around the following factors:

- When cotton is being grown or harvested;
- For initial audit, make sure there is sufficient time to take the decision on permission to trade including review of the Corrective Action Plan ahead of the date when BCI will release the volumes of BCI Cotton to Producers in that region;
- For Producers transitioning from a license to certification, licenses may be extended when this is not feasible;
- When the report has been selected for review, the Certification Body shall allow 7 days for the BCI draft report review to be completed;
- For surveillance and renewal audits, the best time to access the priority and risk areas, e.g. worker interviews;
- For renewal audits, ensuring between 12 and 18 months left on current certificate.

5.5.5 The Certification Body shall communicate with the Producer to arrange an audit.

5.5.6 The Certification Body shall also inform BCI of any planned audit by creating or editing the audit order in the Audit Order Management section of the BCI INTACT platform. In this section of the platform, the Certification Body is also able to access any files uploaded by BCI and view any memo that BCI might have attached to the record.

5.5.7 The Certification Body is responsible for confirming which indicators are applicable to the audit within the BCI Principles and Criteria.

1. For Producers transitioning to certification or new producers, it is BCI's responsibility to provide information to the Certification Body at the beginning of the season, but the Certification Body is required to double check accuracy when planning the audit.

2. For Producers who have already transitioned to certification, the Certification Body should rely on the information captured in INTACT during the previous certification audit, by checking either the certification scope tab in INTACT or the audit report itself. If a change in scope is applicable, this would be logged by BCI in INTACT via a memo.

5.5.8 The auditor shall communicate the date of the audit and send the Producer an audit plan between 7 and 14 days in advance of the scheduled visit.

5.5.9 The audit plan should include as a minimum:

- Date of the audit;
- Scope of the audit;
- Audit team information;
- Audit activities.

#### 5.5.10 The auditor shall:

1. Request the farmers list from the Producer Unit at least 48 hours prior to attending the onsite audit.
2. Select, from this list, the farming households to interview and confirm them to the Producer Unit:
  - At least 3 medium farms shall be visited, or for smallholders at least 3 learning groups shall be visited, and from within each learning group at least 3 farming households shall be represented;
  - The auditor shall request the PU manager to arrange with the farmer that household members who participate in farming are present for the interviews wherever possible (this is only relevant if they have participated or are currently participating in farming activities and/or training).
3. Then arrange the timing of interviews in the audit agenda based on feedback from the PU manager to suit the farmers and their households.
4. Carry out at least the following number of interviews:
  - For medium farms, at least 3 farmers and up to 2 other household members;
  - For smallholder farmers, at least 15 people interviewed of which at least 9 are farmers and the rest can be other household members, where relevant.

## 5.6 Producer Audit

5.6.1 The Certification Body carries out the audit to evaluate objective evidence to determine the extent to which the Producer is following the BCI Principles and Criteria and, where relevant, Large Farm Group requirements.

5.6.2 The auditor shall follow [General Certification Requirements](#), sub-section 15, in relation to all interviews, and consider the interview guidance in [Annex 1](#).

5.6.3 The Certification Body carries out all initial audits onsite except in the case of force majeure. For other audits see Table 11 below.

Audit Type	Description
Initial audit	A Producer Unit, Large Farm or Large Farm Group's first audit. Also used when a Producer re-joins after withdrawing from the programme. This is a full audit and is

	always completed onsite except for cases of force majeure. For new Producer Units it is normally preceded by a document review.
Surveillance audit	An audit performed between full audits, which is focused on management and areas of risk or non-compliance. This is a partial audit that may be completed remotely or onsite and is only done on a risk basis.
Renewal audit	Audit to renew certification performed 4 years after initial audit for Producer Units and 3 years for Large Farms and Large Farm Groups, ensuring at least 1 year until certificate expiry. This is a full audit and is always completed onsite except for cases of force majeure.
Management checks	For Large Farm Groups, a remote check annually of group management internal systems. See <a href="#">Section 3</a> for details.

Table 11: Certification Body Audit Types.

## Sample Size and Selection

5.6.4 The auditor shall plan and conduct initial audits and renewal audits in alignment with the minimum sample sizes, as stated in [Table 13](#).

5.6.5 The auditor shall select samples for audit in consideration with the factors in selecting samples and sample size, as stated in [Table 13](#).

5.6.6 For all Producers, the auditor shall not sample the same farms, Learning Groups and individuals at consecutive audits unless there is good reason.

5.6.7 The auditor shall assure that, when selecting workers for interview or selecting farms or learning groups to visit, the relevant farmers or management play no role.

- As relevant to Producer type, this includes: Smallholder and Medium farmers, Producer Unit staff, Large Farm management, Large Farm Group management or Programme Partner.

## Gathering Information from External Sources

5.6.8 The Certification Body shall gather information from external sources for all Producer audits, as per [Table 12](#).

5.6.9 The Certification Body may gather this information ahead of the onsite audit or during the onsite audit.

5.6.10 Examples of external sources include school teachers, community leaders, health centres, agricultural labour inspectors, civil society organisations and agrochemical dealers. External sources may additionally include government databases and news articles as well as BCI.

## Opening Meeting

5.6.11 The auditor shall conduct the opening meeting with the relevant management responsible for the Producer or Large Farm Group.

5.6.12 The auditor shall cover the relevant information as per [Table 12](#).

## Document Review

5.6.13 For all Producers, the auditor shall review documents as per [Table 12](#).

5.6.14 The auditor shall consider the self-assessment record (and internal assessment record for Producer Units) when considering the Producers' ability to identify risks of non-conformity and

compliance with the related Principles and Criteria Indicator (1.1.2 for Large Farms and 1.1.4 for Producer Units).

5.6.15 To maximise time efficiency for on-site interviews with workers, farmers and Producer management, documentation should be requested at least 1 week in advance (ideally 2 weeks). The review of this documentation should be completed before the onsite verification.

## Interviews

5.6.16 Auditors shall conduct interviews in the audits for all producers, see the types of interviews per producer type and what to include as per [Table 12](#).

- The auditor shall consult the guidance in [Annex1](#) in relation to how interviews are conducted
- Children under 15 shall never knowingly be interviewed
- Children between 15 and 17 shall not routinely be interviewed
- Where justified children between 15 and 17 may be knowingly interviewed only:
  - By people qualified through a certificate in child protection and safeguarding procedures combined with either experience of child welfare/ social work or training in interviewing children
  - Where interviews are carried out with agreement of the child's parent or guardian and in the presence of any trusted person/s the child requests
  - The guidance in [Annex5](#) is followed.

5.6.17 The auditor shall consider the best way to conduct interviews to get the best representative group and assure a good level of participation.

5.6.18 The auditor should consider where it is relevant to use focus group discussions (no more than 6-7 people) alongside one to one interviews;

5.6.19 The auditor should avoid groups where hierarchies, cultural or language differences create barriers to participation.

5.6.20 The auditor shall ensure the following aspects for worker interviews:

- Participants in the interview feel safe, secure and comfortable and their privacy is protected;
- Information about the interviews and the information obtained shall be recorded, but worker names can be withheld owing to confidentiality. In these cases, a short description of the role is sufficient;
- Interview questions shall not be leading;
- If it is not possible to interview hired workers onsite owing to reasons beyond the auditor's control, the reasons provided by Producer management or the auditor's observations should be clearly documented in the audit report. If onsite interviews cannot be

conducted for a justifiable reason, remote interviews with workers and/or labour brokers should be arranged. Worker interviews are crucial for verifying the Principle 5 Indicators;

- The audit teams and accompanying translators should allow for interviews of Smallholder/Medium Farm farmers or Large Farm management and workers without the presence of Large Farm Group management, Field Facilitators, Producer Unit management or Programme Partners. Exceptions to this may be considered where the range of languages spoken makes this impossible and assistance is needed in translation. This should be noted within the audit report and should not be the case of the majority of interviews.

## Farm Visual Inspection

5.6.21 The auditor shall assess compliance with the BCI Principles & Criteria through visual inspection. This includes but is not limited to the areas identified as relevant in [Table 12](#).

## Assessing Compliance of the Producer Unit Management System

5.6.22 For all clauses in the BCI Principles and Criteria, the auditor will consider the overall management system in the following areas:

- Policies and plans, including if they are realistic and locally relevant, and well understood;
- Competency of the Producer Unit management and Field Facilitators;
- Implementation and interventions;
- Monitoring, including how do they track progress and are issues detected.

5.6.23 The auditor shall also consider how the Producer Units internal management system assures compliance to the Principles and Criteria across the Producer Unit. As part of this, the auditor should consider the following:

- Producer Unit Learning Group formation and participation;
- Data collection from farms and use in monitoring compliance;
- Internal assessment sample planning and reporting, and related self-completion;
- Corrective action implementation across farms in the Producer Unit through training or other interventions;
- How the self-assessment supports and demonstrates the internal management, identifying risks to compliance and mitigating them.

5.6.24 Where gaps are found in a management area, the non-conformity can be raised against the relevant management Indicators as per the Decision Trees in [Section 5.7](#). Please refer to Tables [16](#) and [17](#) to see the definitions of grading types.

## Closing Meeting

5.6.25 The auditor shall, at the end of the audit, conduct a closing meeting with the Producer management. The meeting shall cover the following topics in [Table 12](#).

## After the audit

5.6.26 The auditor shall report to BCI within 24 hours if they detect any kind of unethical conduct from the staff representing the Producer, including the offering of bribes in any kind or cash. This will result into a negative audit decision.

Section of the Audit	Producer Type	Relevant Information
Gathering information from external sources	All	Information on both environmental and social aspects of the BCI Principles and Criteria as relevant within the region. For example, labour profiles and hiring practices, farming practices adopted by farmers in the region, pesticide use, health impacts of heat or pesticides. <b>This is additional to information gathered from BCI. Therefore, BCI staff cannot be consulted as external sources as part of the audit process.</b>
Opening meeting	All	Introductions, purpose of the audit, summary of audit activities, check documentation is available, confirm no retaliation steps taken against workers (or farmers where relevant), method of reporting and non-conformity grading, confidentiality and conflicts of interest, language of the audit.
	Producer Units, Large Farm Groups	List of farmers or learning groups to select for sample.
Farm visual inspection	All	Management and storage of pesticides and fertilizers; type of labour used on the farm; water sources used for irrigation; practices affecting health and safety, such as use of personal protective equipment; availability of potable water.
Document review	All	IPM Strategy, self-assessment records.
	Producer Units	Activities and monitoring plans, internal assessments, farmer field books, records of monitoring.
	Large farm groups	Internal audit and management review records, Site list and status.
	Decent Work All where minimum wage is being verified	<b>Review labour profiles and documentation relating to monitoring and grievance mechanisms.</b> List of all workers, including seasonal and temporary workers, with full names, gender, year of birth, type of work (permanent/seasonal/temporary), worker category and start/end dates of work; Payroll documentation for all worker types/categories, including overtime payment records (if applicable), worker timesheets and output records (if applicable, such as in the case of output-based/piece work); A sample of written contracts (at least one for each type/category of worker, if applicable); Collective bargaining agreements (if applicable); Agreements and payment records related to labour brokers or other intermediaries involved in recruitment, management or payment of labour, including their licenses/certificates and contact details (names,

		emails and phone numbers of main contact points, if applicable).
	Land conversion	<p>Large Farms have records and/or maps of land use back to start of 2021 to demonstrate there is no conversion from natural ecosystems.</p> <p>Large Farms and Producer Units have records of how the Better Cotton land conversion assessment procedure has been followed for any ongoing land conversions.</p>
Producer Unit management interview	Producer Units	<p>Roles, responsibilities and structure of the Producer Unit;</p> <p>Activity plan development, review, implementation including participation in activities by farmers, workers and communities;</p> <p>Monitoring plan design, implementation and improvement tracking. Including internal assessment and self-assessment;</p> <p>How the Producer Unit management was able to confirm to the best of their knowledge there has been no land conversion from natural ecosystems since the start of 2021 and how they ongoing monitor if land conversion from natural ecosystems or HCVs is occurring.</p> <p>Data management systems in place;</p> <p>Labour monitoring and remediation system development, findings, activity adjustments, community consultation;</p> <p>How consultation and capacity strengthening are planned to be inclusive;</p> <p>Gender lead appointment and consultation;</p> <p>Understanding of climate change adaptation and mitigation priorities;</p> <p>Areas of livelihood focus and how they were selected;</p> <p>For renewal audits, areas of continuous improvement and progress against them;</p> <p>Understanding of the BCI Principles and Criteria.</p>
Large Farm management interviews	Large Farms & Large Farm Groups	<p>The farm management system;</p> <p>Labour profile, and how labour is managed;</p> <p>Continuous improvement focus areas (renewal audit only);</p> <p>As relevant labour monitoring and remediation system, gender lead appointment and consultation.</p>

Large Farm Group management interview	Large Farm Groups	Resources to oversee the farms in the group, internal audit outcomes and corrections, compliance with Large Farm Group requirements.
Smallholder and Medium Farm Farmer interviews	Producer Units	Participation in Producer Unit activities; Their understanding of the practices promoted by Producer Unit management to meet the BCI Principles and Criteria, and their level of implementation.
Worker interviews	All	Understanding of/access to information on labour rights; Participation in and understanding of capacity strengthening/training activities; Recruitment processes; Payment modality; Understanding of health and safety in their roles; Understanding on age-appropriate work; Any risk areas relevant to the regional context.
Gender lead or committee interview	All where Gender lead required	How they have been consulted in ensuring inclusivity (including consultation, monitoring and capacity strengthening activities, and/or training as relevant).
Closing meeting	All	Thank Producer management for facilitating the audit; Re-iterate the purpose of the audit; Confirm the positive findings where the Producer is performing well; Confirm and leave a record of potential non-conformities; Confirm the next steps, including timelines for the corrective action plan template (if relevant), the report, decision on certification or permission to trade, and corrective action plan and implementation.

Table 12: Audit components.

Sample	Producer Type	Minimum Sample Size	Selecting the Sample
External sources	All	3	Independent from the Producer and Producer influence; Local and relevant to the Producer being audited; Consider any risks and recommendations from BCI; Consider both environmental and social aspects.
Farmer fields visited	Large Farm Group	Square root of the total number of	Consider different regions and risks and any issues identified in the internal audit. Sample

		farms in the group rounded to the nearest whole number	size may be increased in cases of risk, such as previous suspension, presence of temporary workers, use of highly hazardous pesticides approved for exceptional use.
	Medium Farm Producer Unit	At least 3 farmers and up to 2 other household members	Consider different regions and risks, new farms joining the group.
	Smallholder Producer Unit	At least 1	Consider outcomes of farmer interviews, including access to workers, practice adoption and possible risks.
Worker interviews	All	Between 5 and 30 workers. For producers with fewer than 5 workers, attempts should be made to interview all workers	Sample to be representative and incorporate any vulnerable groups (e.g. migrants and particular genders and castes). Include any worker categories not included in previous audits. Include worker representative where relevant. Consider different categories including hired and <b>non-hired</b> labour as <b>applicable</b> . <i>Note: Include labour brokers interviews when relevant and possible.</i>
Farmer field books	Producer Units	Not defined	Consider sampling those that can be cross checked with people interviewed and a sample from farms not visited during the audit.
Learning Groups visited	Smallholder Producer Unit	At least 3, from within each at least 3 farming households to be represented	Consider Learning Groups under new Field Facilitators or Field Facilitators with the most Learning Groups to manage.
Farming households interviewed	Medium Farm Producer Unit	At least 3 farmers and up to 2 household members (the rest are listed farmers)	Dependent on farmer fields visited.
	Smallholder Producer Unit	At least 15, with 5 from each Learning Group, and up to 6 household members (the rest are listed farmers)	Dependent on learning groups visited. Consider inclusion of any vulnerable groups.
Just Producer Unit management	Producer Units	All Producer Unit Managers and where feasible all Field Facilitators	Where these are not possible to interview, a representative sample should be interviewed, considering Field Facilitators overseeing different regions and risks. If it is not possible to interview all Field Facilitators, a note shall be made in the audit report to consider in the next audit.

Table 13: Sample sizes.

## 5.7 Non-Conformities, Report and Corrective Action Plans

### Identifying and Grading of Non-Conformities

5.7.1 The auditor shall identify findings throughout the audit as per [General Certification Requirements](#), sub-section 15.

5.7.2 The auditor shall grade non-conformities based on the category of indicator and the relevant Decision Tree, as defined in Tables [14](#) and [15](#) and related Decision Trees. Please refer to Tables [16](#) and [17](#) to see the definitions of grading types.

- Where Decision Trees refer to more than one source of information, this does not consider each individual person as a different source of information but refers to a different source. For example, interviews with farmers and interviews with workers can be considered as two different sources.
- When a new version of the P&C is launched in the first season of a certified Producer Unit transitioning to this new version, they will not be able yet to monitor improvement against new indicators as per Decision tree 2A but would instead baseline practice adoption.

### Decision Trees on Non-Conformity Grading

Type	What	Decision Tree
PU management Indicators	Indicators that require a management system, process, plan or strategy. These indicators will have associated documents and/or records. It is expected that this is implemented, understood by those responsible, relevant to the regional context, and that it covers all relevant field indicators.	1
Producer Unit field Indicators	Indicators where adoption and/or awareness is expected in the farm, field, by farmers and/or workers. The Producer Unit management will monitor this adoption. The Producer Unit will have targets for adoption/awareness to track to assure compliance. Capacity strengthening activities can be used to address needed improvements. In the case of Decent Work, indicators will also monitor the risk and provide relevant remediation.	2 (Sections A and B)
Producer Unit other Indicators	Indicators that do not fit the above categories where compliance needs to be assessed in isolation.	4
Large Farm management Indicators	Indicators that require a management system, process, plan or strategy. These indicators will normally have associated documents and/or records but may be a system that can be demonstrated. It is expected that this is: implemented,	1

	understood by those responsible, relevant to the regional context, covers all relevant field indicators.	
Large Farm field Indicators	Indicators where adoption at the farm is required either in farming practices or good labour practices. The Large Farm should be able to demonstrate that farming practices are implemented and on target. For decent work indicators, the Large Farm should be able to demonstrate good labour practices	3
Large Farm other Indicators	Indicators that do not fit the above categories where compliance needs to be assessed in isolation.	4
Large Farm Group management Indicators	The Large Farm Group management requirements include management plans, records and implemented activities across the farm. Responsibility for assuring Large Farms' compliance with the Principles and Criteria.	6
Decision Tree 5 shall also be considered in all grading of non-conformities at surveillance or renewal audits.		

Table 14: Indicator Types and Related Decision Tree.

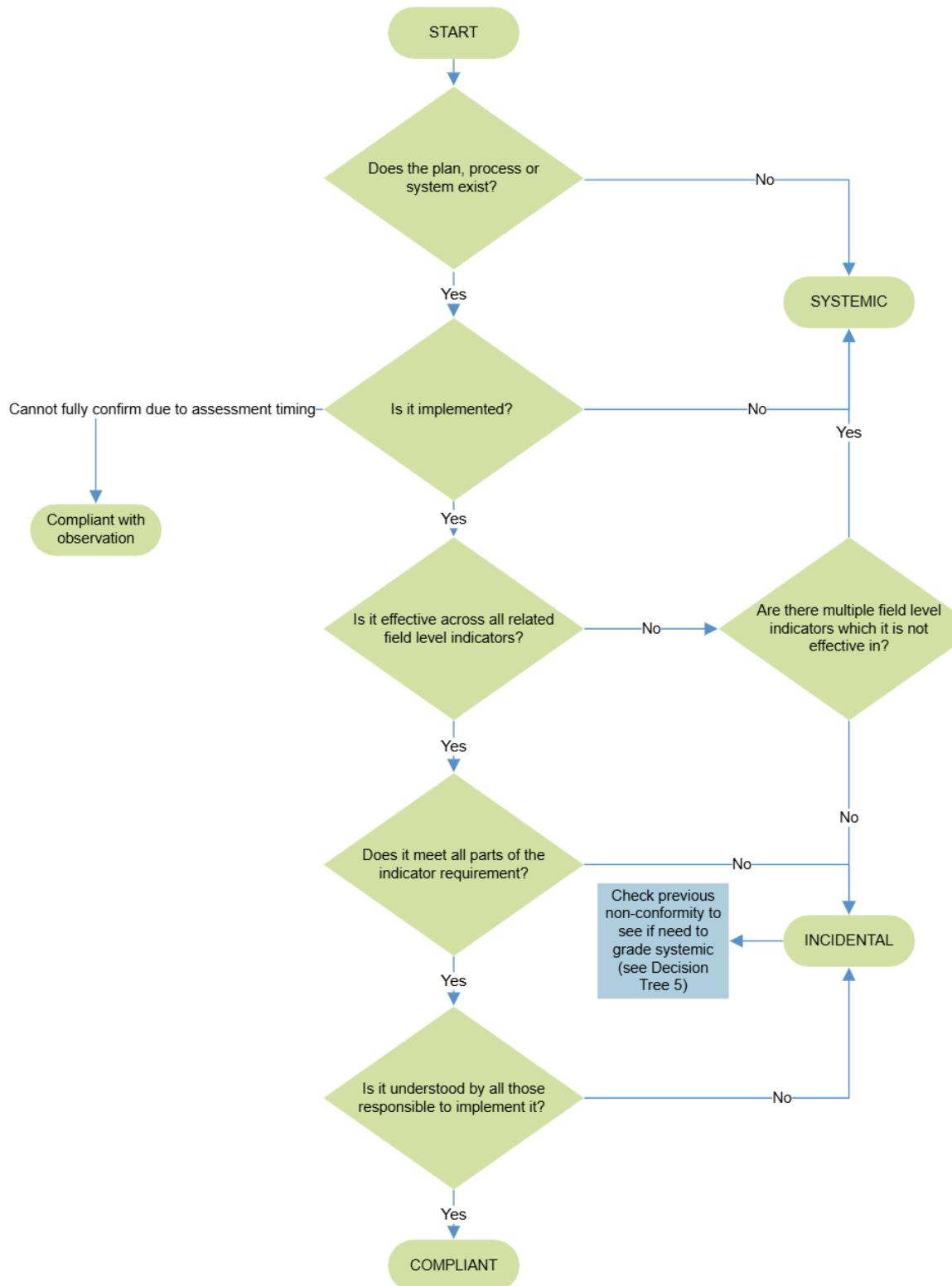
Principles and Criteria Indicator	Producer Unit management	Producer Unit field	Producer Unit other	Large Farm management	Large Farm field	Large Farm other
1.1.1	X					
1.1.2	X					
1.1.3	X					
1.1.4				X		
1.1.5			X	X		
1.1.6		X				X
1.2.1	X			X		
1.2.2	X					
1.3.1	X					
1.3.2				X		
1.4.1	X					
1.4.2			X			
1.4.3			X			
1.4.4				X		
1.5.1	X			X		
1.5.2			X			X
1.6.1	X			X		
1.7.1		X				X
1.7.2			X			X
2.1.1		X			X	
2.1.2		X			X	
2.1.3		X			X	

2.1.4		X			X	
2.1.5		X			X	
2.2.1		X			X	
2.2.2		X			X	
2.3.1		X			X	
2.3.2		X			X	
2.3.3		X			X	
2.4.1			X			X
2.4.2			X			X
3.1.1	X					
3.1.2		X				
3.1.3		X				
3.1.4		X				
3.1.5		X				
3.1.6		X				
3.1.7				X		
3.2.1		X			X	
3.3.1		X			X	
3.3.2	X			X		
3.4.1		X			X	
3.5.1		X			X	
3.5.2		X			X	
3.5.3		X				
3.5.4		X				
3.5.5		X			X	
3.5.6		X			X	
3.5.7		X				
3.5.8		X			X	
4.1.1		X			X	
4.1.2		X			X	
5.1.1	X			X		
5.1.2		X				
5.1.3		X				
5.1.4						X
5.2.1		X			X	
5.3.1		X			X	
5.4.1		X			X	
5.4.2		X			X	
5.4.3		X			X	
5.4.4		X			X	
5.5.1		X			X	
5.5.2			X			X
5.6.1		X			X	

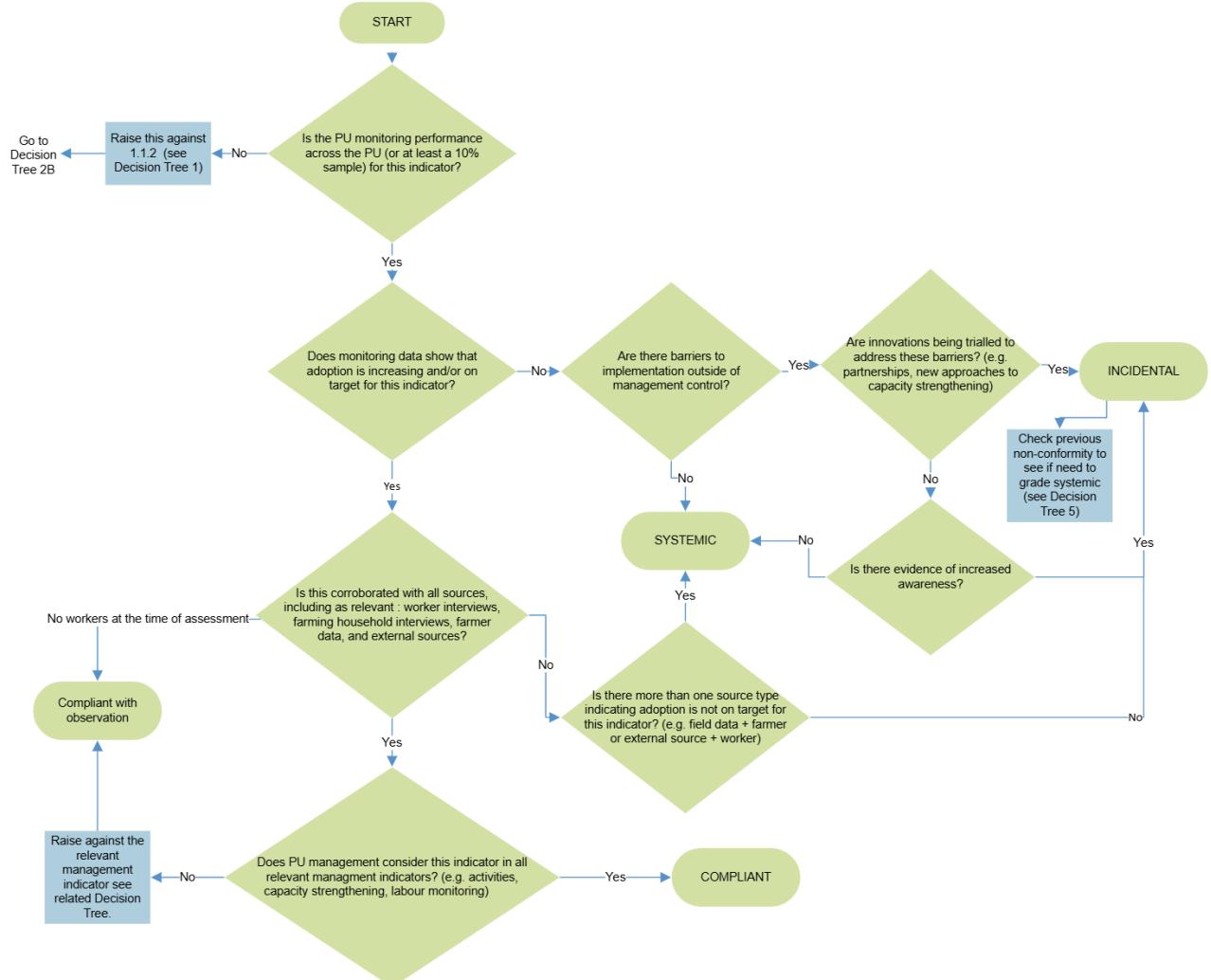
5.7.1		X			X	
5.7.2		X				
5.8.1		X			X	
5.8.2		X			X	
5.8.3		X			X	
5.9.1		X			X	
5.9.2		X			X	
5.10.1		X			X	
5.10.2		X			X	
6.1.1			X			
6.1.2		X				

**Table 15: Indicators and Applicable Type to Determine Decision Tree. Note: Indicators 5.3.1–5.9.2 are all decent work related.**

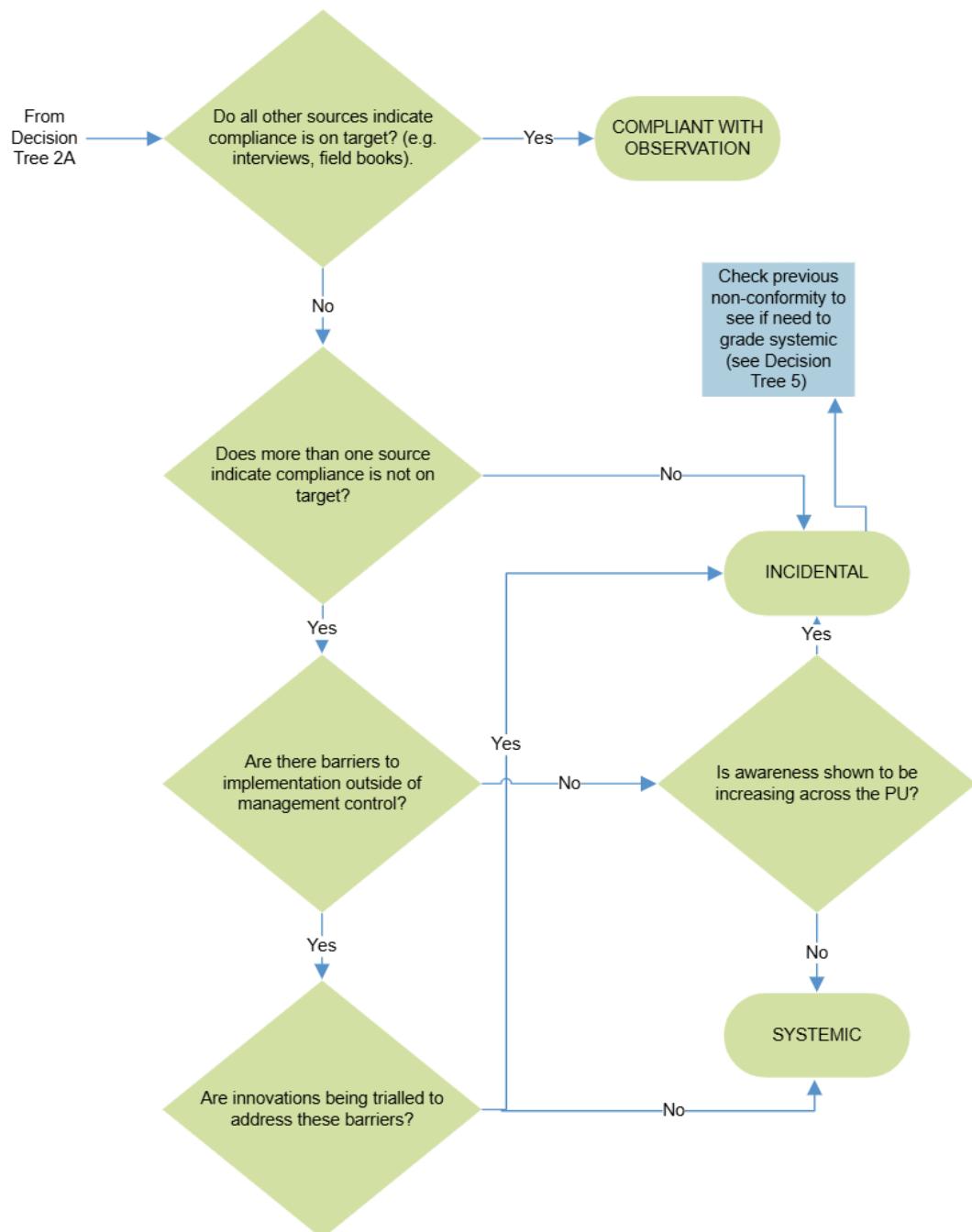
Decision Tree 1: Assessing compliance of Producer Unit or Large Farm Management indicators



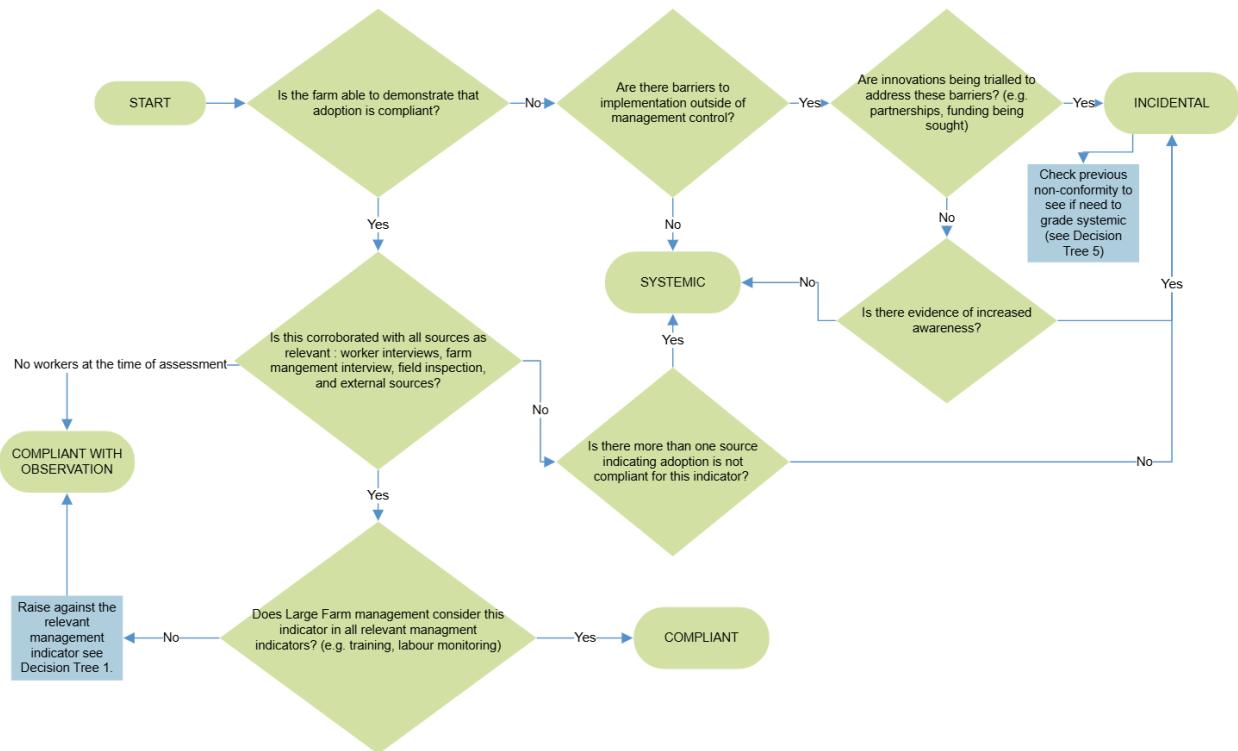
Decision Tree 2A: Assessing compliance of Producer Unit field indicators  
- part 1



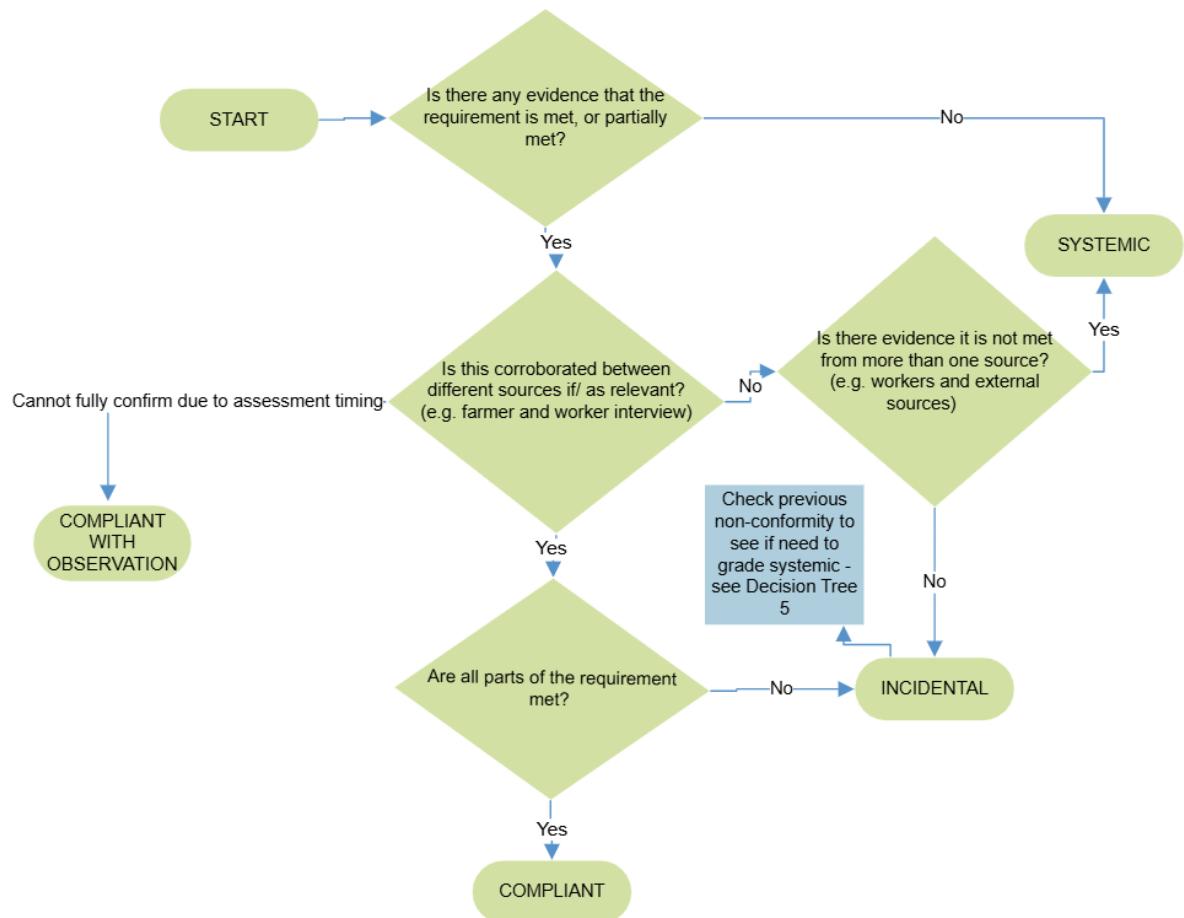
Decision Tree 2B: Assessing compliance of Producer Unit field indicators  
part 2



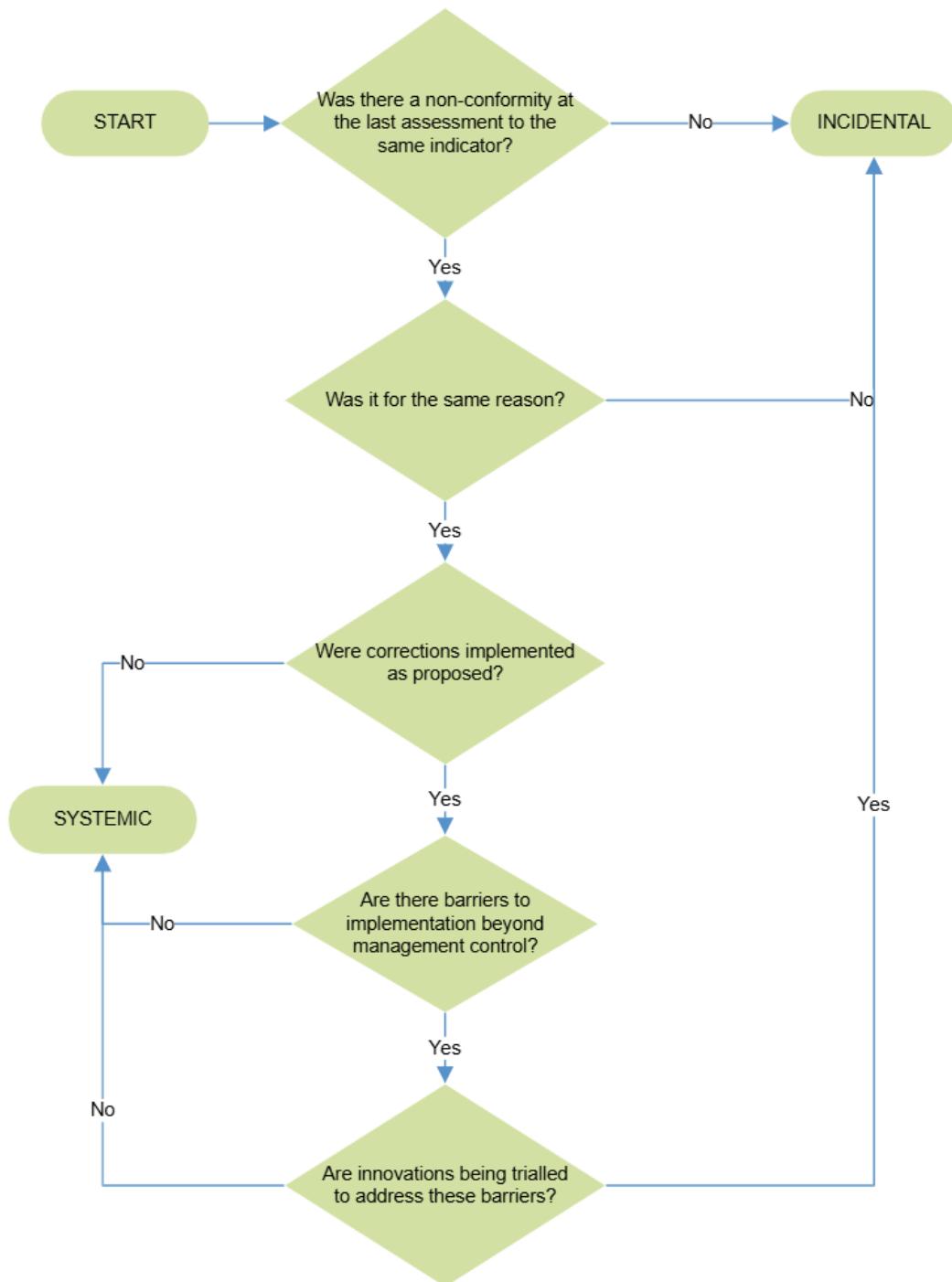
Decision Tree 3: Assessing compliance of Large Farm field indicators



Decision Tree 4: Assessing compliance of individual requirements - Producer Unit and Large farm



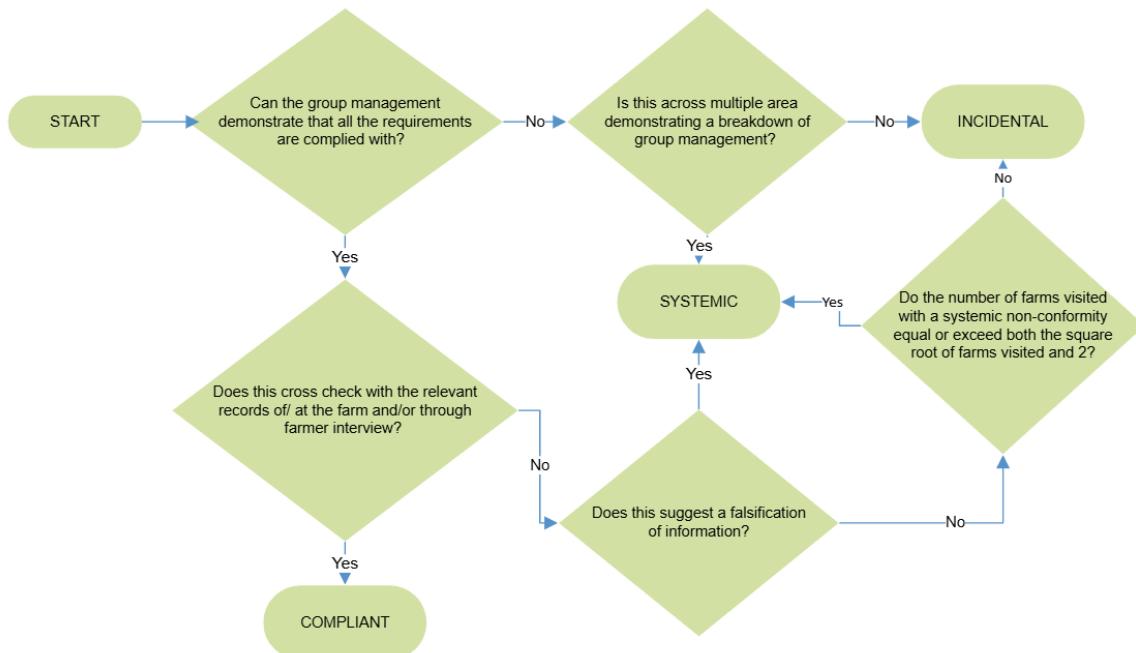
### Decision Tree 5: Previous non-conformity compliance



Note: An example of a situation where corrections are being implemented but some barriers are in place is that of a training that has been conducted but that has led to no change in adoption or awareness. In such a case the Producer is expected to try new

innovative approaches. If there are barriers outside the Producers control preventing them from implementing a planned correction, then they should apply for a variation to extend the timelines based on a new plan.

Decision Tree 6: Assessing compliance of Large Farm Group Management requirements



Grading type	Large Farm Management system indicators – grading definition	LF field indicators – grading definition	Specific indicators – grading definition	Large farm group management	Repeat non-conformity – grading definition
Compliant	Adoption is compliant with the indicator and considered in related management	Adoption is compliant with the indicator and considered in related management	There is evidence of compliance, corroborated between relevant sources	There is demonstrated evidence of compliance cross checked between farm and group	
Compliant with observation	Adoption is compliant with the	Adoption is compliant with the	Evidence of compliance cannot fully		

	indicator but there are management gaps (raise non-conformity against management indicator) or sources of evidence to corroborate not available at the time of audit (e.g. workers)	indicator but there are management gaps (raise non-conformity against management indicator) or sources of evidence to corroborate not available at the time of audit (e.g. workers)	be assessed due to the timing		
Incidental	There is evidence that adoption is not compliant with the indicator. However, there are barriers to adoption and innovations are being trialled, or awareness is increasing.	There is evidence that adoption is not compliant with the indicator. However, there are barriers to adoption and innovations are being trialled, or awareness is increasing.	There is evidence a part of the indicator is not met, or there is evidence from one source of non-compliance (e.g. farmers interviewed in a learning group).	There is only one requirement not met or minor failings in requirements and there is not a demonstratable breakdown in the group management	Corrective actions were implemented as planned and innovations are since being trialled to address barriers and improve compliance
Systemic	There is no evidence that adoption is compliant or there is evidence of non-compliance corroborated between various source types. There are no	There is no evidence that adoption is compliant or there is evidence of non-compliance corroborated between various source	There is no evidence of compliance, or there is evidence corroborated between different source types (e.g. external sources, monitoring records,	It is not possible to demonstrate multiple group management requirements are met demonstrating a breakdown in the group management, and/or evidence of a falsification of	The corrective actions were not implemented OR there are no barriers to adoption nor innovations being trialled.

	innovations nor increased awareness.	types. There are no innovations nor increased awareness.	worker interviews) that the indicator is entirely not met.	information and/ or the number of large farms with systemics is at least 2 and more than the square root of farms visited.	
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Table 16: Large Farm gradings.

Grading type	PU Management system indicators – grading definition	Producer Unit Field indicators – grading definition	Specific indicators – grading definition	Repeat non-conformity – grading definition
Compliant	The management system exists and is effectively implemented.	Adoption is improving or at the targeted level and this field indicator is considered in related management indicators.	There is evidence of compliance, corroborated between relevant sources.	
Compliant with observation	Management system exists but its implementation cannot yet be confirmed due to audit timing	Adoption is improving or at the targeted level, but there are some management gaps (raise non-conformity against management indicator).	Evidence of compliance cannot fully be assessed due to the timing	
Incidental	Management system exists and is implemented but it is not effective in relation to all field level indicators, is not fully	There is evidence that adoption is not improving and/or not at the targeted level. However, any of the following	There is evidence a part of the indicator is not met, or there is evidence from one source of non-	Corrective actions were implemented as planned and innovations are since being trialled to address barriers

	understood by responsible people and/or a part of the system is absent.	exists: evidence is not corroborated between different sources and/or barriers to adoption exist and innovations are being trialled and/or awareness is improving.	compliance (e.g. farmers interviewed in a learning group).	and improve compliance.
Systemic	The management system does not exist, is not implemented or is ineffective across multiple field level indicators.	Neither adoption or awareness is improving nor at the targeted level and no new innovations are being trialled relating to known barriers.	There is no evidence of compliance, or there is evidence corroborated between different source types (e.g. external sources, monitoring records, worker interviews) that the indicator is entirely not met.	The corrective actions were not implemented OR there are no barriers to adoption nor innovations being trialled.

 Table 17: PU **gradings**.

## Reporting Timelines and Technical Review

5.7.3 After each audit, the auditor shall complete a report using the template provided by BCI.

5.7.4 Information collected within each audit is treated as confidential except as defined in [General Certification Requirements](#), sub-section 9.

- Names of workers are not recorded in the audit report, and names of farmers and external sources should also be excluded wherever practical.

5.7.5 All reports shall go through a technical review process by a competent individual familiar with the BCI Principles and Criteria or team that were not involved in the audit prior to being finalised.

5.7.6 The auditor shall share a draft report with BCI within 14 calendar days of the audit closing meeting, only if selected for sample by BCI.

- BCI shall then have a 7-calendar day window to provide comments on the audit report;
- Auditors are required to consider the comments from BCI before they finalise the non-conformities or the report.

5.7.7 The auditor shall send the non-conformities and corrective action plan template to the Producer within 30 calendar days of the audit closing meeting and following the technical review, and where relevant BCI review.

- For initial audit, the Certification Body shall take a decision on permission to trade (see [Section 5.8](#)) and share this with the Producer within 30 calendar days of the audit closing meeting.

5.7.8 The auditor shall send the final report to the Producer within 14 calendar days of receipt of the corrective action plan. The report can be finalised and issued even before the receipt of the corrective action plan if neither the certification decision nor the report is going to be affected by the plan.

5.7.9 Where there are no non-conformities, the Certification Body shall send this report to the Producer within 30 calendar days of the audit closing meeting.

5.7.10 The auditor or Certification Body shall submit a copy of the finalised audit report to BCI within 14 calendar days of receipt of the corrective action plan.

## Corrective Action Plan

5.7.11 The Certification Body shall confirm to the Producer the corrective action processes (as per this section) and provide a template for completion of corrective action plans, including:

- The root cause of the non-conformity;
- The corrective actions intended to correct the non-conformity;
- The responsibilities, resources and timelines;
- How they will monitor ongoing effectiveness in the case of corrections requiring changes in farmer or worker awareness or adoption of practices (as relevant).

5.7.12 The Certification Body shall confirm to the Producer the consequences of not submitting the corrective action plan or implementing the corrections within the agreed timelines (as per this Section).

5.7.13 The Producer shall determine the root cause of each non-conformity, propose a corrective action plan, and submit to the Certification Body in their template within 30 days of receiving the non-conformities.

- The Certification Body may approve extensions to this 30-day timeline up to 90 days based on reasonable justification from the Producer,

- For initial audits, inform the Producer that if a corrective action plan of sufficient quality to address the non-conformities is not received and reviewed ahead of the volume release date this may impact their access to market that season.
- The maximum timeline for corrective action implementation is normally 6 months, but up to 12 months may be proposed if the corrective actions can only be implemented during the next cotton season.

5.7.14 The auditor shall verify the corrective action plans to determine if they are of sufficient quality to address the non-conformity:

- Additional information may be requested to confirm the plan is of sufficient quality;
- If the plan is not of sufficient quality and an extension is not agreed, this can result in the suspension of certification or not awarding permission to trade (see [Sections 5.8](#) and [5.14](#)).

## Corrective Action Close Out

5.7.15 The Producer shall, within the timeline agreed in the corrective action plan, submit to the Certification Body the details (and evidence of) corrective action implementation.

5.7.16 The auditor shall verify that the corrective actions are implemented, and the objective achieved:

- In the case where the non-conformity relates to low awareness or adoption of a practice across workers or a group of farms, both evidence that the activity has been conducted, and that monitoring shows a related increase in awareness and/or adoption and/or, as a minimum, this monitoring is planned in the season is needed.

5.7.17 If the corrective action evidence demonstrates compliance with the indicator, the Certification Body can award certification as per [Section 5.7](#).

- The Certification Body shall upload evidence of corrective action to INTACT.

5.7.18 If sufficient evidence cannot be provided within the timeline to confirm that the corrective action is closed, the Certification Body shall suspend, not award or not renew certification (as per [Tables 20, 21](#) and [22](#)).

## 5.8 Decisions on Certification and Permission to Trade

### Overview

5.8.1 The Certification Body shall only issue certificates if there is evidence of full compliance with the Principles and Criteria.

5.8.2 The Certification Body may maintain certification if non-conformities are within the thresholds, and being addressed within the timelines, defined in this document.

5.8.3 The Certification Body shall take a decision on the outcome of an audit based on the following Tables [20](#), [21](#) and [22](#).

5.8.4 Once a certification decision has been taken, the Certification Body shall ensure that all audit details and attachments are entered in the INTACT audit order, including:

- Audit team participants;
- Auditee participants;
- Audit scope;
- P&C checklist with all non-conformities identified and observations made during the audit;
- Corrective Action Plan (CAP) and Root Cause Analysis details, once these have been received from the PUM;
- Audit report;
- Certification outcome based on the audit results;
- Any updates to the certification status (e.g. suspension, withdrawal);
- Official certificate or Statement of Permission to Trade;
- Suspension or withdrawal letter, if relevant, indicating the duration of the suspension or withdrawal.

5.8.5 BCI shall release volumes of BCI Cotton to the Producer as per Tables [20](#), [21](#) and [22](#), provisional upon ongoing eligibility also being in place and there being no reason to withhold volumes as defined in [Section 4.5](#).

5.8.6 If any of the following issues are identified at either the Producer Unit, Large Farms or Group Manager, the Certification Body certification may not be issued, or if already issued, withdrawn:

- Failure to close out non-conformities from monitoring activities;
- Failure to cooperate with BCI or approved 3rd party assessors in monitoring activities;
- Issues that may bring BCI into disrepute;
- Unethical behaviour (bribery, corruption etc.).

## Awarding Permission to Trade

5.8.7 Where non-conformities are found at the initial audit, but the threshold allows for permission to trade, the Certification Body shall confirm this to both BCI and the Producer (see [Annex 3](#) for an example).

5.8.8 The decision on permission to trade is made by a person different from the auditor with suitable competence to confirm appropriate raising and grading of non-conformities. Normally this can be done by the technical reviewer of the report (see [General Certification Requirements](#), sub-section 11).

- **Permission to trade is only granted upon successful receipt of an effective corrective action plan of sufficient quality to address the non-conformity i.e. complete and relevant to the root cause.**

5.8.9 The Certification Body shall take a decision on permission to trade **within 14 days of receipt of the corrective action plan** ~~after the closing meeting~~ and should plan this to be ahead of the date for BCI Cotton volume release.

5.8.10 For group certification, individual farms can have permission to trade BCI Cotton if:

- Group management does not have any systemic non-conformities;
- Individual farms are under the thresholds in [Table 21](#);
- **A corrective action plan of sufficient quality to address the non-conformities is received.**

5.8.11 Permission to trade shall not be granted to any Producer re-joining after a certificate is withdrawn unless all non-compliances identified at the point of withdrawal have been addressed.

5.8.12 The Certification Body may award permission to trade for a maximum of 12 months.

5.8.13 The Certification Body shall issue a formal statement of permission to trade to the Producer at the decision date in 5.8.8 with the following information:

- Confirmation that permission to trade BCI Cotton has been granted;
- The scope of the permission to trade (Farms and/or Producer Units it covers);
  - For Producer Units: the Producer Unit code, Producer Unit name and Programme Partner;
  - For Large Farm: the code, the address, acreage, named farm and/or farm management (to include the legal entity signing the certification agreement and the management responsibility to meet the Principles and Criteria and the requirements of this document);
  - For Large Farm groups: the group manager and a list of farms (address, acreage, farmer).
- The date and outcome of the initial audit;
- The issue and expiration date of the permission to trade;
- The conditions upon which certification can be achieved before permission to trade expires;
- The person at the Certification Body who authorised the permission to trade;
- The name and address of the Certification Body.

5.8.14 Permission to trade may be confirmed in a written letter or statement (see Annex 3 for example).

## Issuing Certification

5.8.15 The Certification Body shall only award certification to the Producer when full conformity to the BCI Principles and Criteria is demonstrated and the audit outcome is Compliant as per the Tables [20](#), [21](#) and [22](#).

5.8.16 The Certificate shall replace the permission to trade where this was in place.

5.8.17 When certification is awarded or renewed the Certification Body shall issue a certificate to the Producer. The certificate shall include the information required by ISO 17065 and the following information:

- The scope of certification (what is being certified and the standard it is being certified to). See [Section 5.2](#);
- The entities covered by the certificate:
  - For Producer Units: the Producer Unit code, Producer Unit name and Programme Partner;
  - For Large Farms: the code, address, acreage, named farm and/or farm management (to include the legal entity signing the certification agreement and the management responsibility to meet the Principles and Criteria and the requirements of this document);
  - For Large Farm Groups: the Group Manager and a list of farms (address, acreage, farmer);
  - In all cases: the legal entity is to be included in the certificate as above (normally Programme Partner, Large Farm name, Group management entity).
- The date of the audit;
- The date the certificate is issued by the Certification Body to the Producer;
- The start date of the certificate;
  - For initial audit, the date of the decision to grant;
  - For renewal audits, the date of certificate expiry.
- The expiry date of the certificate;
  - At initial audit, this is the date the decision on permission to trade (or, if no non-conformities, certification) was taken plus 4 or 5 years depending on the Producer category;
  - At renewal audit, the date of certificate expiry and new certificate start date plus 3 or 4 years depending on the Producer category.
- The name and address of the Certification Body;

- The signature of the decision maker or other defined authorisation of the person at the Certification Body assigned such responsibility;
- Unique certificate number.

5.8.18 The duration of the certificate shall be:

- 3 years for Large Farm and Large Farm Groups;
  - However, for initial certification 1 additional year shall be added for either certification (if no non-conformities are found) or permission to trade (if incidental non-conformities are found below threshold) or a combination of these (e.g. if incidental non-conformities are closed in 6 months) (see [Table 19](#) for an example).
- 4 years for Producer Units;
  - However, for initial certification up to 1 additional year shall be added for either certification (if no non-conformities are found) or permission to trade (if incidental non-conformities are found below threshold) or a combination of these (e.g. if incidental non-conformities are closed in 6 months) (see [Table 18](#) for an example).

5.8.19 If a certificate is updated by the Certification Body following a Surveillance Audit, or for other reasons, the Certification Body shall keep the certificate validity dates the same but update the issue date to reflect the fact that a new version of the certificate has been issued.

5.8.20 If a permission to trade is granted, once certification is achieved by the Producer, the Certification Body shall issue a certificate to the Producer:

- **The permission to trade is then cancelled;**
- The certificate issue date shall be the date the certificate is issued by the Certification Body to the Producer;
- The certificate validity start date shall be the date the decision to grant certification was taken (not the date the permission to trade was granted);
- The certificate validity expiry date shall be the date the decision to grant the permission to trade was taken plus 4 or 5 years depending on the Producer category;
- As an example, a permission to trade is granted to a Producer Unit and is valid from 1st June 2025 to 1st December 2025. Certification is then granted to the Producer Unit on 1st October 2025. A certificate issued on 10th October 2025 will indicate a certificate validity start date of 1st October 2025 and a certificate validity expiry date of 1st June 2030.

5.8.21 When issuing a new certificate following a Renewal audit, the Certification Body shall set the start date of the new certificate to coincide with the certificate validity expiry date of the previous certificate, regardless of when the new certificate is issued.

- This is to guarantee that, unless a decision is made to terminate a Producer certification (based on non-conformity or breach of terms and conditions), a Producer always benefits from the full validity duration of the certificate their category dictates (four or five years) and does not incur additional costs of certification services over a period of 10 to 15 years owing to the shortening of said validity.

- As an example, a certification is granted to a Producer Unit valid from 1st June 2025 to 1st June 2030. The certification is then renewed following a re-audit on 1st February 2030. A certificate issued on 10th February 2030 will indicate a certificate validity start date of 1st June 2030 and a certificate validity expiry date of 1st June 2035.

5.8.22 If a Producer transfers certification from one Certification Body to another, the new Certification Body and previous Certification Body shall manage the certificate as follows:

- If the transfer happens in time for a re-audit to take place with the new Certification Body, the new Certification Body is to issue a new certificate in line with this section;
- The previous Certification Body can only cancel the current certificate on the agreed transfer date;
- If the transfer occurs in the middle of a certificate validity period, the new Certification Body and the previous Certification Body must agree on an official transfer date and inform the Producer and BCI to update their records accordingly. The process agreed in writing between the two Certification Bodies must guarantee a continuity of the Producer certification status and its certificate document validity. The certificate validity dates must be in line with this section.

## Example of Certificate and Audit Cycles

Actions	Year										
	0	1	2	3	4	5	6	7	8	9	10
Audits	Initial (Sept)	Risk-based surveillance		Renewal		Risk-based surveillance		Renewal		Risk-based surveillance	
Permission to trade	Issued (Oct)	Expires (Oct)									
Certificate 1		Issued (Apr)			Expires (Oct)						
Certificate 2					Issued (Oct)				Expires (Oct)		

Table 18: A Producer Unit with non-conformities in initial audit that are closed After 6 Months.

Note: The first certificate lasts 4 years and 6 months, the following certificates only 4 years.

Actions	Year									
	0	1	2	3	4	5	6	7	8	
Audits	Initial (Sept)	Annual management check for groups, risk-based surveillance for all		Renewal	Annual management check for groups, risk-based surveillance for all		Renewal	Annual management check for groups, risk-based surveillance for all		
Permission to trade	n/a									

Certificate 1	Issued (Nov)				Expires (Nov)				
Certificate 2					Issued (Nov)			Expires (Nov)	

**Table 19: A Large Farm Group with no non-conformities in the initial audit.**

Note: The first certificate lasts 4 years, the following certificates only 3 years.

Total Non-Conformities		Audit Outcomes	Scenario 1: Initial Audit (No Active Certificate)	Scenario 2: Surveillance Audit (Active Certificate)	Scenario 3: Renewal Audit (Active Certificate)
Incidental	Systemic		Status of Certification, Permission to Trade, BCI Cotton Volume Release, and Additional Surveillance Activities		
0	0	Compliant	Certificate issued; BCI Cotton volume may be released.	Certificate maintained; BCI Cotton volume may be released.	Certificate maintained and new certificate issued (start date aligned to expiry of existing certificate); BCI Cotton volume may be released.
≤18	0	Compliant with incidental non-conformity	Permission to trade issued <b>subject to corrective action plan</b> (12 months); BCI Cotton volumes may be released; Certificate issued once correction in place within agreed timeline.	Certificate maintained provisional on corrective action implementation; BCI Cotton volumes may be released.	Certificate maintained provisional on corrective action implementation; BCI Cotton volumes may be released; New certificate issued once correction in place within agreed timeline (start date aligned to expiry of existing certificate).
>18	0	Compliant with Incidental non-conformities above	No permission to trade nor certification; No volumes released;	Certificate suspended for 12 months with suspension starting 6 months after volume release	Certificate suspended for 12 months with suspension starting 6 months after volume release

		acceptable threshold	New certification audit needed the following season and closure of non-conformities.	for the season. For those 6 months seasonal volumes can be sold;  No volume release during suspension;  Remote surveillance next season or renewal audit to confirm closure non-conformities;  Suspension lifted after 12 months if remote surveillance or renewal audit confirms closure of non-conformities.	for the season. For those 6 months seasonal volumes can be sold;  No volume release during suspension;  Remote surveillance to confirm closure of NCs. Certificate may be extended up to 6 months (in suspended state) to allow for this, with this time taken off the next certificate;  New certificate issued after 12 months if remote surveillance confirms closure of non-conformities.
Any amount	1 or 2	Systemic non-conformity	No permission to trade nor certification;  No volumes released;  Initial audit needed the following season and closure of	Certificate suspended for 12 months with suspension starting 6 months after volume release for the season. For those 6 months seasonal volumes can be sold;	Certificate suspended for 12 months with suspension starting 6 months after volume release for the season. For those 6 months seasonal volumes can be sold;

			non-conformities.	No volume release during suspension;  Onsite surveillance next season or renewal audit to confirm closure of non-conformities;  Suspension lifted after 12 months if onsite surveillance or renewal audit confirms closure of non-conformities.	No volume release during suspension;  Onsite surveillance to confirm closure of NCs. Certificate may be extended up to 6 months (in suspended state) to allow for this, with this time taken off the next certificate;  New certificate issued after 12 months if onsite surveillance confirms closure of non-conformities.
Any amount	>2	Systemic non-conformity	No permission to trade nor certification;  No volumes released;  Initial audit needed the following season and closure of non-conformities.	Certificate withdrawn immediately upon decision;  Cotton sales blocked and no volume release for the following season;  New certification not permitted for 24 months and includes closure of non-conformities;	Certificate withdrawn immediately upon decision;  Cotton sales blocked and no volume release for the following season;  New certification not permitted for 24 months and includes closure of non-conformities;

				Initial audit may happen after 24 months.	Initial audit may happen after 24 months.
Corrective action plans not submitted in the timeline and without agreed extension	No permission to trade		Certificate suspended for 12 months and until corrective action plan in place	Certificate suspended for 12 months and until corrective action plan in place	Cotton sales blocked until suspension lifted
Non-conformities not corrected within agreed timeline, and no request for extension agreed.	No permission to trade nor certification; No volumes released; Initial audit needed the following season and closure of non-conformities.		Certificate withdrawn for 24 months after volume release for that season; No volume release for 1 season; New certification not permitted for 24 months and includes closure of non-conformities; Initial audit may happen after 24 months.	Certificate withdrawn for 24 months; No volume release for 1 season; New certification not permitted for 24 months and includes closure of non-conformities; Initial audit may happen after 24 months.	

Table 20: Producer Units Audit Outcomes, Certification and BCI Cotton Volume Release.

Total Non-Conformities	Audit Outcomes	Scenario 1: Initial Audit (No Active Certificate)	Scenario 2: Surveillance Audit (Active Certificate)	Scenario 3: Renewal Audit (Active Certificate)
Incidental	Systemic		Status of Certification, Permission to Trade, BCI Cotton Volume Release, and Additional Surveillance Activities	

0	0	Compliant	Certificate issued; BCI Cotton volume may be released.	Certificate maintained; BCI Cotton volume may be released.	Certificate maintained and new certificate issued (start date aligned to expiry of existing certificate); BCI Cotton volume may be released.
≤9	0	Compliant with incidental non-conformity	Permission to trade issued <b>subject to corrective action plan</b> (12 months); BCI Cotton volumes may be released; Certificate issued once correction in place within agreed timeline (start date aligned to expiry of existing certificate).	Certificate maintained provisional on corrective action implementation; BCI Cotton volumes may be released.	Certificate maintained provisional on corrective action implementation; BCI Cotton volumes may be released; New certificate issued once correction in place within agreed timeline (start date aligned to expiry of existing certificate).
>9	0	Compliant with Incidental non-conformities above acceptable threshold	No permission to trade nor certification; No volumes released; New certification audit needed	Certificate suspended for 12 months with suspension starting 6 months after volume release for the season. For those 6 months seasonal	Certificate suspended for 12 months with suspension starting 6 months after volume release for the season. For those 6 months seasonal

			the following season and closure of non-conformities.	volumes can be sold;  No volume release during suspension;  Remote surveillance next season or renewal audit to confirm closure non-conformities;  Suspension lifted after 12 months if remote surveillance or renewal audit confirms closure of non-conformities.	volumes can be sold;  No volume release during suspension;  Remote surveillance to confirm closure of NCs. Certificate may be extended up to 6 months (in suspended state) to allow for this, with this time taken off the next certificate;  New certificate issued after 12 months if remote surveillance confirms closure of non-conformities.
Any amount	1	Systemic non-conformity	No permission to trade nor certification;  No volumes released;  New certification audit needed the following season and closure of non-conformities.	Certificate suspended for 12 months with suspension starting 6 months after volume release for the season. For those 6 months seasonal volumes can be sold;  No volume release during suspension;	Certificate suspended for 12 months with suspension starting 6 months after volume release for the season. For those 6 months seasonal volumes can be sold;  No volume release during suspension;

				Onsite surveillance next season or renewal audit to confirm closure of non-conformities;  Suspension lifted after 12 months if onsite surveillance or renewal audit confirms closure of non-conformities.	Onsite surveillance to confirm closure of NCs. Certificate may be extended up to 6 months (in suspended state) to allow for this, with this time taken off the next certificate;  New certificate issued after 12 months if onsite surveillance confirms closure of non-conformities.
Any amount	>1	Systemic non-conformity	No permission to trade nor certification;  No volumes released;  New certification audit needed the following season and closure of non-conformities.	Certificate withdrawn immediately upon decision;  Cotton sales blocked and no volume release for the following season;  New certification not permitted for 24 months and includes closure of non-conformities;  Initial audit may happen after 24 months.	Certificate withdrawn immediately upon decision;  Cotton sales blocked and no volume release for the following season;  New certification not permitted for 24 months and includes closure of non-conformities;  Initial audit may happen after 24 months.

Corrective action plans not submitted in the timeline and without agreed extension	No permission to trade	Certificate suspended for 12 months and until corrective action plan in place  Cotton sales blocked until suspension lifted	Certificate suspended for 12 months and until corrective action plan in place  Cotton sales blocked until suspension lifted
Non-conformities not corrected within agreed timeline, and no reason/request for extension agreed.	No permission to trade nor certification;  No volumes released;  New certification audit needed the following season and closure of non-conformities.	Certificate withdrawn for 24 months after volume release for that season;  No volume release for 1 season;  New certification not permitted for 24 months and includes closure of non-conformities;  Initial audit may happen after 24 months.	Certificate withdrawn for 24 months;  No volume release for 1 season;  New certification not permitted for 24 months and includes closure of non-conformities;  Initial audit may happen after 24 months.

Table 21: Large Farm Audit Outcomes, Certification and BCI Cotton Volume Release (Includes Individual Farms in a Group).

Total Non-Conformities	Audit Outcomes	Scenario 1: Initial Audit (No Active Certificate)	Scenario 2: Surveillance Audit (Active Certificate)	Scenario 3: Renewal Audit (Active Certificate)
Incidental	Systemic	Status of Certification, Permission to Trade, BCI Cotton Volume Release, and Additional Surveillance Activities		
0	0	Compliant	Certificate issued;	Certificate maintained; Certificate maintained and

			BCI Cotton volume may be released.	BCI Cotton volume may be released.	<p>new certificate issued (start date aligned to expiry of existing certificate);</p> <p>BCI Cotton volume may be released.</p>
Any amount	0	Compliant with incidental (includes both individual farm incidental and group incidental)	<p>Permission to trade issued <b>subject to corrective action plan</b> (12 months) if all farms visited are under the threshold in the table above;</p> <p>BCI Cotton volumes may be released;</p> <p>Certificate issued once correction in place within agreed timeline (start date aligned to expiry of existing certificate).</p>	<p>Certificate maintained provisional on corrective action implementation;</p> <p>BCI Cotton volumes may be released.</p>	<p>Certificate maintained provisional on corrective action implementation;</p> <p>BCI Cotton volumes may be released;</p> <p>New certificate issued once correction in place within agreed timeline (start date aligned to expiry of existing certificate).</p>
Any amount	1 or more	Systemic non-conformity	<p>No permission to trade nor certification;</p> <p>No volumes released;</p>	<p>Certificate withdrawn immediately upon decision;</p> <p>Cotton sales blocked and no</p>	<p>Certificate withdrawn immediately upon decision;</p> <p>Cotton sales blocked and no</p>

			<p>New certification audit needed the following season and closure of non-conformities;</p> <p>Individual farms may join other group certificates to continue selling.</p>	<p>volume release the following season;</p> <p>New certification not permitted for 24 months and includes closure of non-conformities;</p> <p>Initial audit may happen after 24 months.</p>	<p>volume release the following season;</p> <p>New certification not permitted for 24 months and includes closure of non-conformities;</p> <p>Initial audit may happen after 24 months.</p>
Corrective action plans not submitted in the timeline and without agreed extension			<p>No permission to trade</p>	<p>Certificate suspended for 12 months and until corrective action plan in place</p> <p>Cotton sales blocked until suspension lifted</p>	<p>Certificate suspended for 12 months and until corrective action plan in place</p> <p>Cotton sales blocked until suspension lifted</p>
Non-conformities not corrected within agreed timeline, and no reason/request for extension agreed.			<p>No permission to trade nor certification;</p> <p>No volumes released;</p> <p>New certification audit needed the following season and closure of non-conformities.</p>	<p>Certificate withdrawn for 24 months after volume release for that season;</p> <p>No volume release for 1 season;</p> <p>New certification not permitted for 24 months and includes closure of non-conformities;</p>	<p>Certificate withdrawn for 24 months;</p> <p>No volume release for 1 season;</p> <p>New certification not permitted for 24 months and includes closure of non-conformities;</p>

		Initial audit may happen after 24 months.	Initial audit may happen after 24 months.
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Table 22: Large Farm Group Audit Outcomes, Certification and BCI Cotton Volume Release.

## 5.9 Annual Authorised Volumes

5.9.1 All Producers with an active certificate or permission to trade to sell BCI Cotton will receive an Annual Authorised Volume allocation – this enables their cotton to be sold into the supply chain as 'BCI Cotton'. Further details on Producer eligibility to sell BCI Cotton are outlined in section 4.5 of this document.

*The volume is based on projected cotton production and is an estimate of the volume each Producer can sell into the supply chain as 'BCI Cotton'.*

5.9.2 Producers in most countries where BCI operates will receive an Annual Authorised Volume (AAV) code once a year at the certification date:

- a) The AAV code is a unique code, specific to each Producer, that is linked to the volume of certified cotton produced by that PU or LF.
- b) The AAV code is to be passed on to buyers of the cotton (i.e. ginners) so that purchases of BCI Cotton can be entered into the BCI Platform.
- c) A new, unique AAV code is generated each year for every Producer with an active certificate/permission to trade; and is valid for the duration of the season.

5.9.3 AAV codes are communicated by BCI to the relevant party that will be trading them.

5.9.4 In countries where combined gin inventories are used (rather than individual AAV codes), the total volume of certified cotton will be updated in the BCI Platform on an annual basis.

## 5.10 Appeals and Complaints

5.10.1 The Certification Body shall be responsible for managing any appeals or complaints raised by the Producer as outlined in the [General Certification Requirements](#).

5.10.2 The Certification Body shall not charge for appeals that are successful. However, they may charge the Producer appeals costs, providing they have confirmed this either in the certification agreement or in the terms and conditions confirmed at the point of appeal application. This must include the expected cost to review an appeal per non-conformity.

5.10.3 Appeals costs may be charged in the following cases:

- a) The original certification decision is upheld – the CB may charge for the person-hours\* spent to review the appeal;

OR

b) Any individual indicator-level non-conformity is not downgraded, irrespective of its impact on the original certification decision – the CB may charge proportionally per non-conformity for the person-hours\* spent to review.

\*The cost per person-hour in the case of appeals should be agreed in advance of each season with the respective BCI Country Assurance Team.

5.10.4 The Certification Body shall allocate no more than 1 person day~~8 person hours~~ to the handling of any appeal. Any instance requiring additional effort shall be supported by a documented and justified rationale.

5.10.5 The Certification Body is responsible for considering how impartial evidence is, including whether evidence may have been delivered under pressure and therefore should be dismissed.

- Examples could be farmers or workers on video refuting evidence they gave during interviews in the original audit.

## 5.11 Remote Audits

5.11.1 Initial and renewal audits are conducted on-site. However, there may be cases of force majeure that prevent an audit from being conducted on-site and these would be handled as per this section.<sup>1</sup> Surveillance Audits may also be remote depending on risk and feasibility. Where remote audits are allowed, the requirements listed in this Section shall be met.

5.11.2 The Certification Body shall ensure that the use of information and communication technology for audit purposes is mutually agreed with the Producer that is being assessed. Where agreement is not reached, the audit shall not be conducted remotely.

- The Certification Body shall include a check within their application review stage that the Producer has the necessary infrastructure to support the use of the information and communication technology proposed;
- The Certification Body shall ensure that confidentiality is upheld while using information and communication technology and remote audit methodologies;
- The Certification Body/auditor may arrange a test call with the Producer to ensure that there is a stable connection to conduct the full audit remotely;
- The Certification Body shall identify and document the risks that may impact the audit effectiveness. This shall include reviewing the selection of the technologies and how they are managed;
- The auditor shall include in the audit plan how information and communication technology will be utilised;

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<sup>1</sup> Please note that this only applies to renewal audits, as initial audits must always be conducted on-site.

- When using information and communication technology, auditors shall have the competency and ability to understand and utilise the information and communication technologies employed to achieve the desired results of audit(s);
- The use of information and communication technology shall contribute to the total audit time as additional planning may be necessary, which may impact audit duration;
- All stages of the audit process as referenced in Section 5.6 of this document shall be covered within a Remote audit;
  - An exception to this may be a field inspection where signal or technology prevents this.

## 5.12 Surveillance Audit

5.12.1 The auditor shall conduct Surveillance Audits in the following circumstances:

- As defined in Tables [20](#), [21](#) and [22](#);
- For Producer Units or Large Farm Groups with over 33% net growth in the number of farmers;
- There is an escalation from BCI where BCI Monitoring has identified a risk of non-conformities being above the threshold for ongoing certification;
- For Producer Units where there is an escalation from a Programme Partner following a Producer Support visit.

5.12.2 The auditor shall conduct the Surveillance audit targeted on:

- Management requirements (see management indicators in Tables [14](#) and [15](#));
- Areas of risk;
- Previous non-conformities.

5.12.3 The auditor shall check effective implementation of non-conformity corrections.

- Where they relate to changes in practice adoption or awareness across a Producer Unit, the effectiveness of correction monitoring must be checked.

5.12.4 A Surveillance audit shall always be conducted against the same version of the standard as the producer is currently certified against rather than the latest available version.

5.12.5 Surveillance audits may be remote where all of the following apply:

- Areas of non-compliance or identified risk do not relate to worker rights;
- It was possible to access workers for interview during the initial audit;
- Feasibility to conduct remote audit has been pre-determined based on access to information and communication technology and access to relevant people.

5.12.6 The Surveillance audit shall always include the following elements of the full audit from Section 5.6:

- Opening meeting;

- Closing meeting;
- Management interview;
- Document review;
- Management systems of Producer Units.

5.12.7 The Surveillance audit shall include the following elements as relevant to the areas of risk and non-compliance:

- Farmer interview;
- Worker interview;
- Gender lead interview;
- Farm visual inspection;
- Gathering information from external sources.

5.12.8 The Certification Body shall take decisions following a Surveillance audit using the processes of [Section 5.8](#) and based on the findings as outlined in Tables [20](#), [21](#) and [22](#).

## 5.13 Renewal audits

5.13.1 The Certification Body shall conduct Renewal audits at the following frequencies:

- For Large Farm Groups, 3 years after last full audit;
- For Individual Large Farms, 3 years after last full audit;
- For Producer Units, 4 years after last full audit.

5.13.2 The Certification Body shall follow all the same processes of the initial audit.

- With the exception of the detailed offsite document review required for initial Producer Units;
- With the additional requirement to verify that progress has been made against the continuous improvement targets.

5.13.3 The Certification Body shall take decisions on Renewal audit as outlined in Tables [20](#), [21](#) and [22](#).

## 5.14 Suspension and Withdrawal

5.14.1 Certificate suspension means certificate is put on hold for a period and can be reactivated under certain conditions (typically a Surveillance audit) after a set number of months (see Tables [20](#), [21](#) and [22](#)).

5.14.2 Certificate withdrawal means that the certificate is made invalid and a new initial audit is required to issue a new certificate after a set number of months.

5.14.3 Certificates are suspended in the cases listed in Tables [20](#), [21](#) and [22](#).

5.14.4 The Certification Body shall contact the Producer in writing (email is acceptable) to inform the Producer of the suspension, including duration of suspension and corrective actions required.

- The Certification Body shall inform the Producer and BCI within 48 hours of the suspension.

5.14.5 Certificates are withdrawn as per the following table:

Issue	Timeline of Certificate Withdrawal (Minimum)
Issues that may bring BCI into disrepute	Withdrawal and minimum 2 years before re-entry
Unethical behaviour or deliberate fraud	Withdrawal and minimum 3 years before re-entry
Failure to provide correction for a suspension	Withdrawal and minimum 2 years before re-entry
No longer meeting the eligibility requirements of table 8	Withdrawal but re-entry upon eligibility being re-established
Scheduled audits are not carried out (Producer refuses access)	Withdrawal and minimum 2 years before re-entry
Certain number of systemic non-conformities as per Tables <a href="#">20</a> , <a href="#">21</a> and <a href="#">22</a>	Withdrawal and minimum 2 years before re-entry
Failure to correct non-conformities within the agreed timeline as per Tables <a href="#">20</a> , <a href="#">21</a> and <a href="#">22</a>	Withdrawal and minimum 2 years before re-entry
A Producer stops participating in the programme	Withdrawal and minimum 1 year before re-entry
Non-payment for Certification Body audit costs	Withdrawal and minimum 1 year before re-entry
Producer going into administration/bankruptcy	Withdrawal and minimum 1 year before re-entry

Table 23: Withdrawal of Certification.

5.14.6 The Certification Body shall contact the Producer in writing (email is acceptable) to inform the Producer of the withdrawal.

5.14.7 The Producer may, after the period of withdrawal, re-apply for the certification process as per the application processes in [Section 5.3](#) of this document, and the Certification Body may take on their application accordingly.

5.14.8 In addition, BCI retains the right to suspend access to BCI Cotton volumes at any time if BCI or a designated third-party auditor has detected any kind of unethical conduct, which may include bribery or fraud or where eligibility is no longer met at per [Section 5.1.1](#).

## 5.15 Certificate Transfers

5.15.1 The existing Certification Body shall cooperate with all transfer requests and share a copy of the most recent audit report with the new Certification Body.

## 5.16 Derogations, Exceptional Use and Variation

5.16.1 The Certification Body shall follow the BCI published derogations and approved exceptional use, when assessing compliance with the BCI Principles and Criteria.

- If an indicator is not met but the terms of the derogation or approved exceptional use are, this would be considered compliant.
- The list of active derogations and exceptional use decisions can be found on the BCI website.

5.16.2 The Certification Body shall implement any variation requests approved by BCI for deviations from the BCI Principle and Criteria Monitoring and Certification Requirements.

5.16.3 For variations to BCI certification processes, the Certification Body shall have a process for the Producer to seek and confirm approval before submitting to BCI.

## 5.17 Changes after certification

5.17.1 When a Certification Body is informed of a change to a Producer's certification scope, they shall consider its impact and any need for further audits.

5.17.2 When a Certification Body is informed of two Producer Units merging, they shall:

- Consider the evidence of effective management being in place before proceeding to accept;
- Update the certification contract to reflect the new merged Producer Units;
- Conduct an initial audit on the merged Producer Unit.

5.17.3 When a Certification Body is informed of a partner contracted to them taking on a Producer Unit from another partner, they shall:

- Review the previous evidence of compliance (e.g. last audit report) and confirm if there are any changes to the composition of the Producer Unit;
- Update the Partner's certification contract to include the new Producer Unit;
- Consider if they can take on the remaining duration of the certificate (e.g. issue a two-year certificate when a PU moved across Partners two years into their four-year certificate) or need to conduct a new certification audit.

5.17.4 In the case outlined in 5.17.3, the Producer Unit should be considered for a new certification audit if, as a result of the PP change:

- The composition of farmers has changed by over 33%;

- The Producer Unit has been unable to close out previous non-conformities;
- The Producer Unit has been unable to submit their field-level Results Indicator reporting (RIR) data.
- Other significant changes have occurred within the Producer Unit (e.g. considerable changes in PU staff).

5.17.5 For transfers from one Certification Body to another, please refer to 5.8.22 of this document.

# 6. Multi-legal entities with a common management – Large farm certification

## 6.1 Details

6.1.1 Where legal ownership of a large farm is split between different family members, or close associates, but the management is common, the process outlined in the following sub-sections may apply. This can be considered only for legal entities operating as part of a common large farm management.

6.1.2 The following are the minimum requirements for being considered as a multi-legal entity single certification.

6.1.3 As a minimum, the multi-legal entities shall:

- Have a common management system in line with BCI Principles and Criteria.
- Employ the same labour force/workers and use same employee-related policies (e.g. hiring practices, wages, disciplinary actions, training etc.).
- Follow the same approaches for crop protection (e.g. spraying decisions, chemical selection), water resources and irrigation management, soil health (e.g. nutrient applications), and biodiversity or wildlife.
- Have a common data management system including maintaining records for all entities on production inputs (e.g. fertiliser and chemical applications and irrigation use) and outputs (i.e. cotton yield).
- Have overarching policies or plans as required to meet relevant BCI Requirements (e.g. phase out plans for pesticides, labour monitoring systems for larger workforces).

6.1.4 The Certification Body shall confirm the above when taking on a new certification that is a multi-legal entity or when confirming the addition of a new farm that is a multi-legal entity to a group certification. In the case of group certification, the group manager is also responsible to confirm this when taking on new farms.

6.1.5 One legal entity (called the farm management contact) shall confirm responsibility for assuring compliance of the operations of all legal entities in the scope of certification. The farm management contact shall be the signatory for the certification contact (if individual certification) or the group agreement (if group certification). For individual certification, other

legal entities may be required to sign up to an annex to the certification agreement depending on the Certification Body requirements.

6.1.6 The legal entities agree on a key contact person to be responsible for:

- Communication with the Certification Body and BCI in individual certification.
- Responsible for communication with the group manager if they are a group member.

6.1.7 The Certification Body confirms to BCI that this is a multi-legal entity certification and the legal entities involved.

6.1.8 BCI sets them up with one account in Salesforce with one farm code but reference to all the legal entity names.

6.1.9 As part of audit planning, the CB shall confirm:

- That the location at which all documentation and records can be reviewed is determined as 'main audit site' at which the audit can be conducted.
- If and how responsibilities are divided in relation to compliance with the Standard and that responsible people will be available for interview.
- All the different locations of the legal entities and any regional differences that could affect compliance with the Standard and therefore need to be considered in sampling.

6.1.10 If during preparation for an audit or at an audit it is identified that there is in fact not a common management approach, then the certification process may be halted by the Certification Body and a request to reapply as separate entities made.

6.1.11 There is only one audit report and one set of non-conformities raised against the farm as a whole. The key contact is responsible for assuring that the non-conformities are corrected.

6.1.12 All legal entities details are included in the certificate against the one code and one acreage. The main contact could be on the front with the rest annexed.

6.1.13 The Large Farm is issued one overall volume.

# Annex 1: General Guidance on Conducting Interviews and Focus Group Discussions

## Conducting Interviews

### Skills

Interviewers must have sufficient language skills to conduct effective interviews and be sufficiently knowledgeable about local cultural characteristics and farm conditions to analyse information gathered through the interview. If local language is not spoken, the audit team must arrange appropriate and impartial translation services (see Section 15 of the General Certification Requirements).

### Preparation

Interviewers should determine, in advance of the visit, which issues should receive particular attention in the location where the visit will take place. For example, if in the interviewer's experience the issue of child labour has arisen in a particular region, these issues should receive closer attention. This will vary from location to location. Sources of information for this focus will include knowledgeable local organisations, interviewer's experience, information received from media reports and other public sources, etc.

### Location

Interviews should be conducted in a location that makes the interviewee comfortable. This is especially important for workers; the location should be chosen not to raise the possibility that the farmer will subject the worker to retaliation. Interviews with workers should be conducted at an independent place (it is better off the farm's premises), trusted by workers, where workers feel they have freedom of speech. Common sense should be used to determine specific sites that afford the greatest opportunity for productive, confidential discussions. On-site locations include informal conversations in the green house, net house, plot of the farm, the area just outside the farm, common villagers' gathering place. In all circumstances, care should be taken to ensure that the location of interviews, whether on or off site, does not skew the information provided.

## Safeguard Worker Confidentiality and Security

All reasonable steps should be taken to ensure that the interview process does not compromise the safety or job security of the worker. At a minimum, interviewers must ensure that the interview process is conducted in a confidential manner. They need to conduct interviews in a manner that ensures that workers will suffer no adverse consequences as a result of the interviews by communicating the confidential nature of the interview, communicating that retaliation as a result of the interview is not permitted, and using interviewers who are most likely to gain the trust of workers (e.g. female workers will most likely feel more comfortable with a female interviewer).

Interviewers should inform workers that the interviews are confidential, and that the information will neither be attributed to them, nor provided to farmers or the management without their permission.

In addition, interviewers should provide no information that could lead to the identification of specific workers as the source of information that could cause retaliation against the workers interviewed.

## Interview Techniques

People in different parts of the world may respond to different approaches to the interview. Based on past experience and input from knowledgeable organisations, the interviewers should ensure that questions are asked in a culturally appropriate manner.

Several techniques, such as asking open-ended questions, are generally considered to contribute to effective interviews. These should be applied to the maximum degree possible. The interviewer should not provide any clues to the interviewees as to how they “should” respond. Interviewer should allow interviewees to respond to neutral questions that do not lead to one answer or another.

Interviewees, especially farm workers, may be illiterate and have limited knowledge about their welfare or rights and may not understand abstract terms such as freedom of association, collective bargaining, etc. Therefore, interviewers should take care to use language that is easily understandable to interviewees, rather than words that may confuse them. For example, asking workers if they are “harassed” may confuse them, while asking if workers are treated fairly may elicit more and better information.

Ask interviewees to describe situations that they have encountered, as well as issues related to the BCI Principles & Criteria that they may have observed elsewhere. In some circumstances, workers (and farmers) may be more willing to describe difficulties affecting others than they will be to address issues they face themselves.

Interviewers shall ensure that they conduct interviews in a manner sensitive to the cultural characteristics present. Sensitive issues, such as sexual harassment, bonded labour, caste

system, forced labour, etc. need to be addressed in a careful and thoughtful manner. A determination of what these techniques are will necessarily vary from location to location. In making this determination, interviewers should rely on their own experience, information gathered through consultation with knowledgeable organisations, and other sources to determine, in advance of the visit, the best ways to conduct interviews.

## Conducting Focus Group Discussions

A Focus Group Discussion (FGD) is a group discussion of (preferably) 6 - 12 people, guided by a facilitator, during which group members talk freely and spontaneously about a specific topic. Its purpose is to obtain in-depth information from the members of the group. An FGD aims to be more than a question-answer interaction, the idea being that group members discuss the topic among themselves in more depth (with guidance from the facilitator) than they would in a one-on-one interview. Discussing issues in a group format is also more efficient than a series of one-on-one interviews.

### Preparing for an FGD

- Ensure that the issues/list of topics to be focussed on during the discussions are clear in your mind beforehand.
- Ideally, there will be two people running the FGD: a facilitator to run the FGD, and a recorder to take notes. This might not always be possible.
- Ensure confidentiality of opinions, and request participants to do likewise.
- Ensure that the area for the FGD is in a space that is quiet/free from distractions, is accessible, private and in a neutral location where participants will feel welcomed and comfortable.
- Arrange participants in a circle. Recommendation is for the facilitator (and recorder) to sit at the same level as the participants to encourage discussion by minimising formalities and unintended power dynamics.
- Consider having refreshments available for participants (away from the circle to avoid distractions during discussions).

### Conducting an FGD

- The facilitator should introduce themselves, and the purpose of the FGD.
- The facilitator should encourage discussion and encourage as many participants as possible to express their views.
- There are no right or wrong answers, and the facilitator should always react neutrally to any responses (verbal and non-verbal). It is important to remember that a FGD is not designed to reach a consensus position on an issue.

- Avoid running a 'Question-and-Answer' session; instead, encourage discussion by asking participants to explain more about a topic, and by using one participant's response to ask another participant to follow up on a topic. Useful introductory phrases to use are, for example, 'Farmer A said this, but what do you think, Farmer B?', 'Tell me more about that ...', 'Can you explain what you mean ...'
- Only ask one question at a time.
- Be comfortable with silence; some participants may be more likely to speak if they have time to consider the question and their reply, before they speak.
- If participants are not providing enough information, try probing questions, such as 'Please provide an example ...', 'Is there anything else ... I don't understand, please explain...', 'Does anyone have a different opinion/see things differently...'
- If discussions go off in the wrong direction, you can use phrase like 'How does this relate to ...' 'Interesting point, but what about ...'
- Consider using anonymous written responses if sensitive issues stall the discussions.
- Be on the look-out for non-verbal clues, such as body position, tone or strength of voice, facial expressions and body movement.
- Avoid being the expert and providing an opinion; instead, direct the question back to the group: 'What do you think/what would you do?' [However, consider setting aside time afterwards in case there is a need to address issues/provide information that has been requested].
- Ensure participants clearly understand that their opinions are valued, and that they are the experts — the FGD is to help the facilitator(s) learn from them.

## Role of the Recorder

When available (e.g. team of 2 assessors working together), a designated recorder should keep a record of the content of the discussion as well as emotional reactions and important aspects of group interaction. Assessment of the emotional tone of the meeting and the group process will enable you to judge the validity of the information collected during the FGD.

Items to be recorded include:

- Date, time, place;
- Names and characteristics of participants;
- General description of the group dynamics (level of participation, presence of a dominant participant, level of interest);
- Opinions of participants, recorded as much as possible in their own words, especially for key statements;
- Emotional aspects (e.g. reluctance, strong feelings attached to certain opinions);
- Spontaneous relevant discussions during breaks or after the meeting has been closed.

A supplementary role for the recorder could be to assist the facilitator (if necessary) by drawing their attention to:

- Missed comments from participants;
- Missed topics (the recorder should have a copy of the discussion guide during the FGD);

If necessary, the recorder could also help resolve conflict situations within the group that the facilitator finds difficult to handle on their own.

# Annex 2: Example certificates

Expera  
Certification



## Cotton Growers Group

has been audited and certified as meeting the requirements of

### BCI Principles and Criteria

&

### P&C Monitoring and Certification Requirements: Large Farm Group Requirements

For the

***Growing, harvesting and storage of cotton on the land owned or leased by the farmers listed in Appendix 1***

Audit date:	20 <sup>th</sup> August 2028	Certificate number:	00576
Certificate issue date:	29 <sup>th</sup> September 2029	Authorising signature	
Certificate start date:	8 <sup>th</sup> October 2029	Authoriser name and title:	Sarah Pazos Director of Certification
Certificate expiry date:	8 <sup>th</sup> October 2032	Certification Body name & address:	Expera Certification 30 Main St. Garford Leeds LS25 1DS UK



## Appendix 1: List of Farmers in the scope of certification

## Appendix 2: CoC addition to scope of Certification

<b>Date of Audit:</b>	20 <sup>th</sup> August 2028
<b>Scope of Certification:</b>	Protocol for Producers with subcontracted gins
<b>Authorising signature:</b>	
<b>Authoriser name and title:</b>	Sarah Pazos Director of Certification

**Figure 3: Large Farm Group example.**



**Expera  
Certification**



## Producer Unit PKSF58 of ABI

has been audited and certified as meeting the requirements of

### BCI Principles and Criteria

&

### P&C Monitoring and Certification Requirements: Large Farm Group Requirements

For the

### ***Growing, harvesting and storage of cotton on the land owned or leased within the Producer Unit***

Audit date:	20 <sup>th</sup> August 2028	Certificate number:	00579
Certificate issue date:	29 <sup>th</sup> September 2029	Authorising signature	
Certificate start date:	8 <sup>th</sup> October 2029	Authoriser name and title:	Sarah Pazos Director of Certification
Certificate expiry date:	8 <sup>th</sup> October 2033	Certification Body name & address:	Expera Certification 30 Main St. Garford Leeds LS25 1DS UK



Figure 4: Producer Unit example.

# Annex 3: Example permission to trade

Expera Certification  
30 Main St.  
Garford  
Leeds LS25 1DS  
UK

Cotton Growers Group  
1275 Nicholas Street, Topeka  
66608 Kansas

## Statement of Permission to Trade for Cotton Growers Group

Following the audit of the Cotton Growers Group on 16th September 2025 to the BCI Principles and Criteria and Large Farm Group requirements, this statement confirms a Permission to Trade BCI Cotton. This permission to trade BCI Cotton includes the farmers in the following list.

Large Farm code	Farmer name	Address	Acreage

Permission to trade BCI Cotton is granted from 16th October 2025 until 16th October 2026. Trade of BCI Cotton volumes is also subject to eligibility and volumes being issued by BCI.

Permission to trade is a one-off status following initial audit only. All non-conformities need to be corrected, and Expera to have reviewed and approved the evidence of their implementation, prior to 16th October 2026 for certification to be issued. If certification cannot be issued by 16th October 2026 the permission to trade and right to trade BCI Cotton volume expires on this date and Cotton Growers Group will need to reapply for certification.

This Permission to trade is authorised by:

A handwritten signature in black ink, appearing to read 'Sarah Ross'.



Sarah Pazos

Director of Certification: Expera Certification

**Figure 5: Large Farm Group example.**



Expera Certification  
30 Main St.  
Garford  
Leeds LS25 1DS  
UK

Producer Unit PKSF58 of ABI  
4758 Elk Rd Little  
Tucson  
85701 Arizona

#### **Statement of Permission to PKSF58 of ABI**

Following the audit of the PKSF58 on 16th September 2025 to the BCI Principles and Criteria this statement confirms a Permission to Trade BCI Cotton to this Producer Unit.

Permission to trade BCI Cotton is granted from 16th October 2025 until 16th October 2026. Trade of BCI Cotton volumes is also subject to eligibility and volumes being issued by BCI.

Permission to trade is a one-off status following initial audit only. All non-conformities need to be corrected, and Expera to have reviewed and approved evidence of their implementation, prior to 16th October 2026 for certification to be issued. If certification cannot be issued by 16th October 2026 the permission to trade and right to trade BCI Cotton volume expires on this date and PKSF58 will need to reapply for certification.

This Permission to trade is authorised by:

A handwritten signature in black ink that reads 'Sarah Pazos'.

Sarah Pazos

Director of Certification: Expera Certification

**Figure 6: Producer Unit example.**

# Annex 4: Social auditor competency

With a view to ensuring the high quality of our assessments, BCI has introduced a requirement for its auditing teams to, at minimum, demonstrate basic social auditing competencies, by meeting any of the following criteria by March 2023:

- Post-secondary education and/or 1 year experience in social work or services that includes labour welfare or labour affairs;
- 2 years' experience working on a farm or plantation directly related to managing labour in an operational capacity (general farm management / human resources);
- Experience of conducting at least 6 of any of the following: internal social audits, second- or third-party social assessment (including BCI audits of over 30 workers), or social compliance gap analysis;
- Successfully taken and passed the accredited 5-day SA8000 basic auditing course or equivalent (equivalent courses include Amfori 5-day auditor training course or another 2-day minimum auditor course); or
- Be an APSCA Registered Audit or APSCA Certified Social Compliance Auditor.

# Annex 5: Auditor guidance on interviewing children

BCI is dedicated to ensuring the safety and well-being of the people and communities it works with, protecting them from any potential harm caused through contact with BCI. Supporting and empowering communities is at the heart of BCI's values, and we maintain a zero-tolerance approach to any actions or behaviours that endanger children or adults. This commitment extends to the conduct of all staff, personnel, and representatives carrying out work on behalf of BCI.

**Definition of a Child:** In line with the United Nations Convention on the Rights of the Child, BCI defines a child as anyone under the age of 18.

While BCI does not work directly with children, we recognise that incorporating children's feedback and perspectives can be important in evaluating compliance with our Principles & Criteria and ensuring our initiatives effectively support and empower farming communities.

To this end, this annex provides detailed guidance for auditors on how to ethically and safely engage with children during interviews in agricultural settings, when such interactions are necessary.

Below guidelines align with international best practices from UNICEF and ILO, including the [ILO's Ethical Guidelines for Research on Child Labour](#), and includes interviewing techniques, safeguarding protocols, reporting requirements, and qualifications needed for auditors conducting child interviews.

## 1. Do No Harm

At the heart of this guidance is a commitment to the "Do No Harm" principle. Auditors must prioritise the safety, well-being, and dignity of each child during all interactions. This principle requires auditors to actively prevent any risk of physical, emotional, or psychological harm throughout the interview process. Auditors are responsible for ensuring that no action, question, or decision during the interview compromises the child's safety or exposes them to negative consequences.

The "Do No Harm" approach emphasises the following:

- **Non-Intrusive Interaction:** Engage in a manner that respects the child's boundaries and emotional state, allowing the child to feel safe and unpressured.
- **Informed Consent:** Fully inform both the child and their guardian of the interview's purpose and confirm voluntary participation.

- **Risk Mitigation:** Take steps to identify and avoid risks that could harm the child, including risks of retribution or social stigma due to their participation.

## 2. Required Credentials for Auditors Interviewing Children

Auditors responsible for interviewing children should have appropriate qualifications and training to ensure they can conduct interviews with sensitivity and adhere to ethical standards. **When these are absent, the auditors should refrain from interviewing the child.** Recommended certifications and credentials include:

- **Child Protection and Safeguarding Training:** Certification in child protection standards and safeguarding procedures (such as UNICEF's Child Protection in Emergencies or similar child welfare programmes).
- **Specialised Training in Child-Centred Interviewing:** Training in child interviewing techniques through recognised organisations.
- **Experience in Working with Vulnerable Populations:** Prior experience or supervised training with child welfare or social work, particularly in the agricultural or development sector.
- **Understanding of Local and International Laws on Child Rights:** Knowledge of laws and guidelines related to child labour, child welfare, and mandatory reporting obligations.

## 3. Ethical Interviewing Techniques for Children

When interviewing children, auditors must create an environment that prioritises the child's comfort and safety. Effective child interviewing techniques include:

- **Establishing a Safe, Neutral Setting:** Ask the child where they would feel comfortable speaking, and if they would like someone they know and trust to be present. Involve a chaperone, such as a guardian, female auditor, a caregiver, or trusted adult, to create a supportive environment while avoiding undue influence. Conduct interviews in a private, neutral location, ensuring the setting is free from adults or authority figures who could intimidate or influence the child's responses. Avoid physical gestures or proximity that could be perceived as intimidating, and respect personal boundaries at all times.
- **Using Age-Appropriate Language:** Tailor language to the child's age and comprehension level. Avoid jargon or complex terms and use simple, direct language to explain each question.
- **Building Trust and Rapport:** Begin with non-intrusive questions to build rapport. Allow the child to speak at their own pace, giving them time to feel comfortable. Respect cultural norms around interactions with boys and girls, ensuring gender-sensitive behaviour.
- **Non-Leading Questions:** Ask open-ended questions that encourage the child to share information voluntarily without feeling pressured. Avoid suggesting answers or leading the child to respond in a certain way.

- **Observing Non-Verbal Cues:** Children may communicate distress or discomfort through body language or facial expressions. Auditors should remain attentive to these cues and adjust their approach if the child appears uncomfortable or terminate the interview without further distressing the child.
- **Explaining the Purpose and Consent:** Clearly explain the purpose of the interview and reassure the child that their participation is voluntary. Obtain verbal assent from the child and formal consent from a parent or guardian.
- Auditors should end interviews with children on a positive and engaging note. This helps the child leave the interaction with a sense of comfort and emotional upliftment. Ask a question that sparks their interest or makes them feel valued, such as: "What do you like to do in your free time?"; "Do you have a favourite game or sport?"; "Which is your favourite football team or TV show?". This practice reinforces trust, ensures the child does not leave the interview feeling distressed, and contributes to building a more supportive and ethical interaction.

#### 4. Standard Operating Procedures for Safeguarding Concerns

Auditors must follow strict SOPs to ensure child safeguarding. The SOPs cover steps to be taken before, during, and after the interview to protect the child from harm.

##### Pre-Interview

- **Risk Assessment:** Conduct a pre-interview risk assessment to ensure the child is in a safe environment and assess potential risks of harm or distress, such as presence of individuals who may pose a threat to the child.
- **Obtaining Informed Consent:** Secure consent from the child's parent or legal guardian. If this is not feasible, defer the interview or consult with child protection authorities.
- **Safeguarding Briefing:** Review safeguarding procedures with any personnel involved, emphasising confidentiality, mandatory reporting, and the child's rights.

##### During the Interview

- **Maintaining Confidentiality:** Ensure only necessary individuals are present and avoid recording identifiable information such as names or locations unless required by safeguarding authorities.
- **Ending the Interview for Signs of Distress:** If the child exhibits distress, discomfort, or reluctance, auditors should immediately end the interview. Supportive resources may be provided if necessary.
- **No Coercion or Pressure:** Remind the child they can stop the interview at any time and reassure them that there are no consequences for refusing to answer.

##### Post-Interview

- **Documenting Safeguarding Concerns:** Document any safeguarding concerns immediately after the interview following organisational protocols. Record observations factually and avoid subjective judgments.
- **Protecting Interview Data:** Secure all notes and recordings to protect the child's identity and confidentiality. Access should be limited to authorised personnel only.
- **Reporting:** Follow mandatory reporting requirements for any suspected abuse or exploitation discovered during the interview, adhering to legal and organisational policies.

## 5. Reporting Guidelines and Protecting the Child's Identity

When reporting findings from child interviews, auditors must ensure the highest standards of confidentiality:

- **Anonymising Information:** Do not include the child's personal information in reports. Use anonymous descriptors (e.g., "child participant") to prevent identification.
- **Limiting Data Sharing:** Share sensitive information only with designated personnel or authorities as required by law or organisational safeguarding policies.
- **Secure Storage and Handling:** Store all documentation, including written notes and recordings, in a secure system that only authorised individuals can access.
- **Mandatory Reporting:** If a child discloses abuse or exploitation, immediately follow local mandatory reporting protocols. Do not attempt to resolve or investigate further; instead, refer the case to child protection specialists or authorities.

## 6. Guidelines on Taking Photographs or Making Recordings During Interviews

Taking photographs or making recordings of children during interviews is strongly **discouraged**. If digital evidence is imperative for the audit, following guidelines must be adhered to:

- **Informed Consent:** A parent, guardian or another trusted adult must be present during the recording and provide informed consent, preferably in writing or a digital format. Information regarding how the recordings will be used should be communicated to both the child and the trusted adult.
- **Limit Recording to Essential Documentation:** Only take photographs or make recordings if strictly necessary for the audit's objectives. Avoid capturing identifiable images unless critical to the documentation needs.
- **Protect the Child's Identity:** If photographing is required, take measures to protect the child's identity, such as focusing on non-identifiable features or obscuring their face.
- **Use of Audio-Only Recording:** Where possible, use audio-only recording to protect visual anonymity.

- **Storage and Access:** Store all photographs and recordings securely, with access limited to authorised personnel only. Use secure, encrypted storage solutions in accordance with data protection regulations; do not store sensitive evidence on personal devices.
- **Confidentiality and Usage Restrictions:** Do not share recordings or images outside of the auditing team or authorised entities unless legally mandated.
- **Destroy Unused or Unnecessary Recordings:** After finalising the report, delete or securely destroy any recordings or images that are no longer needed. Ensure there is no residual data that could compromise the child's identity or safety.

## 7. When Evidence from Child Interviews Cannot Be Used

Evidence obtained during interviews with children should be excluded from formal reporting under these conditions:

- **Coercion or Influence:** If there is any indication the child's responses were influenced by adults, peers, or the interview setting, the information is unreliable and cannot be used.
- **Lack of Consent or Assent:** If the child or guardian did not provide informed consent or assent, data collected from the interview should not be used in the reporting.
- **Signs of Trauma or Distress During Interview:** If the child displayed trauma or significant distress, consider the interview unreliable as it may have caused further harm.
- **Risk of Retribution or Harm:** If using the information could place the child at risk of harm, retaliation, or social stigma, it must not be included in reports.

## 8. Safeguarding Resources for Auditors

For additional information on child safeguarding and ethical interviewing practices, auditors should consult:

- [\*\*UNICEF's Child Protection in Emergencies Training:\*\*](#) Provides extensive safeguarding guidelines, particularly for vulnerable children in challenging settings.
- [\*\*ILO Guidelines on Child Labour and Protection:\*\*](#) Offers sector-specific safeguarding protocols and interview techniques for identifying child labour risks. Reference: *Ethical guidelines for research on child labour*, Geneva: International Labour Office, 2024.