



Assurance Normative Documents:
Summary of Feedback Received
March 2026

About this document

The Better Cotton Initiative (BCI) is the world's leading sustainability programme for cotton. Our mission is to help cotton communities survive and thrive, while protecting and restoring the environment. As a multi-stakeholder platform, we bring partners together across the supply chain to create a world where all cotton production is sustainable.

In February 2026, BCI launched a public consultation to gather stakeholder feedback on proposed updates to two key assurance documents:

- the **General Certification Requirements (GCR)**, and
- the **Principles & Criteria Monitoring and Certification Requirements (P&C MAC)**.

These documents form essential components of the Better Cotton Initiative Standard System (BCISS), our comprehensive approach to supporting more sustainable, environmentally responsible, and socially equitable cotton production worldwide.

This report summarises the feedback received and describes how it was incorporated into the final versions of the GCR and P&C MAC. The revised requirements will become effective in **April 2026**.

We would like to thank all the stakeholders for their time and participation.

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Purpose of the consultation

The consultation aimed to test the credibility, feasibility, and clarity of the proposed changes to BCI’s assurance processes. Feedback was sought from a broad range of stakeholders, including:

- Programme Partners
- Farmers and Producer Units
- Certification Bodies
- Accreditation Bodies
- BCI country teams
- Other interested public stakeholders

Input gathered through this process directly informed the final revisions of the **GCR** and **P&C MAC**.

Consultation process

The public consultation was open from **11–25 February 2026** and consisted of two online surveys, one for each of the normative documents under review.

Oversight of the revision process was provided by the **Internal Steering Team**, bringing together technical experts across BCI functions to ensure alignment, quality, and relevance in the final requirements.

Timelines

Key milestones in the revision process included:

- **December 2025:** Revision process launched
- **11–25 February 2026:** Public consultation open
- **March 2026:** Consultation review, finalisation and publish
- **April 2026:** The requirements become effective

Participation

Table I. Participation Summary from Public Surveys

Consultation Activity	Participation
Public Survey – General Certification Requirements	36 responses from stakeholders in 10+ countries
Public Survey – Principles & Criteria Monitoring and Certification Requirements	30 responses from stakeholders in 5+ countries

Summary and Responding to Feedback Comments

General Certification Requirements

We received **36 responses** of feedback from Large Farms PPs and CBs in Türkiye, PPs in Mozambique, Control Union, IOAS, PPs in India, PPs in Pakistan, Cotton Association Egypt and some contacts in China (no specific details). There were some areas where stakeholders considered changes were not fully credible, feasible or clear. These are detailed and responded to as follows:

- **Short notice audit feasibility:** Comments were raised on practical challenges in implementing. However, as short notice audits are an important mechanism to address risk and align with corporate due diligence. BCI will therefore keep the requirement but take into consideration all the comments in the development of the procedure that supports it.
- **Use of open-source information:** There are many questions about the scope of this. The procedure for this is still to be developed and likely it will be formally implemented from next year and then can be shared if/as relevant accordingly. Considering the scope and credibility of information sources will be part of this.
- **Children interviews:** One comment was raised that children should never be interviewed. This is the case for all CoC audits. For P&C audits children under 15 in no circumstances are to be interviewed knowingly, for 15 to 17 year olds interviews may only be carried out by people with specific competencies/ experience and following specific guidance.
- **Accreditation approach:** Feedback from an accreditation body on non-substantial changes to the accreditation process has been incorporated.

P&C Monitoring and Certification Requirements

We have **30 responses** of feedback from India PPs, Egypt strategic partners, Pakistan PPs, Türkiye PPs and LF, Mozambique PPs. Additionally, since consultation some areas have been noted as probably needing some adjustment. Overall, feedback was very supportive of the changes with the following issues raised.

- **Resourcing women auditors to be present where needed to interview women:** This was agreed by the majority of stakeholders and only questioned by one stakeholder regarding a concern on resourcing auditors. Noting that this auditor can be a supporting auditor and does not need to be lead or meet our lead auditor competency requirements it is considered this should be possible include a women within the audit team for any audits where women can only be interviewed by women.
- **Concern about volume release and Corrective Action Plan timing:** Only 1 person raised this. BCI will manage this through the timely arrangement of audit process, and through setting and confirming volume release dates well ahead. It is important for credibility to have the Corrective Actions Plan agreed where requirements of the P&C are not met before trade is allowed.

- **Concern about 18-month suspension, in case this impacts more than one season of trade:** A couple of comments raised. The suspension is confirmed as 12 months and intended to only impact one season and this will be clarified in guidance.
- **Land conversion:** One stakeholder said there is no need for the self-assessment to cover land conversion in their region since it does not happen. However, this is a global self-assessment approach and the questions do not add much time. No others raised concern.

Overall, there are no substantive changes from the consultation feedback, but a couple of consistency/clarity comments raised we have incorporated.

Additionally, we have noted the following areas where adjustments are needed:

- **Certification Body management of relevant variations:** For variations we will clarify and put in place a process/ form for CBs to submit these directly to us where they relate to certification processes
- **Inform Certification Bodies of volume release date 2 months ahead:** having worked through the timeline/ processes necessary to get from audit planning to Corrective Action close and decision on Permission to Trade we realise now at least 2 months' notice is required for effective Certification Body planning.
- **Permission to Trade and Corrective Action processes:** The process now confirms that the Corrective Action Plan timeline and verification need to be aligned with implementation and that Permission to Trade needs to extend beyond that to allow for verification. Confirm that Permission to Trade needs to be cancelled ahead of the next volume release if certification has not been issued.
- **Which version of the Standard surveillance audits are to:** wording adjusted to confirm surveillance audits have to be carried out in consideration of BCI processes that confirm the version of the standard.
- **Corrective action longest implementation time reduced from 12 months to 11 months:** This is to ensure that implementation of corrective actions and issuing of an initial certificate can take place before a 12 month Permission to Trade expires. *Note: corrective action implementation may be as long as 11 months where it needs to take place during the next cotton season (for example training of seasonal workers).*