



Principles & Criteria v.3.2
Summary of Consultations
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.

The Better Cotton Initiative Standard System (BCISS) is our holistic approach and guide, covering the environmental, social, and economic pillars of sustainability. The BCI Principles and Criteria (P&C) is a critical component of the BCISS, as it sets out the global requirements that all Producers are required to meet to be certified to sell BCI Cotton. These requirements are designed to help focus efforts on areas that deliver clear sustainability improvements at the field level.

The P&C are periodically reviewed and updated to ensure that they remain relevant, credible, and aligned with evolving sustainability expectations and implementation experience. The P&C v.3.2 revision constitutes a Partial Substantive Revision of the standard in accordance with the [BCI Standard Setting and Revision Procedure \(SSRP\) v2.2](#), which used the [ISEAL Code of Good Practice for Sustainability Systems](#) as a reference.

This document summarises the outcomes of the revision process and the stakeholder consultation conducted as part of the development of P&C v.3.2. BCI conducted a 30-day public consultation to gather input on the proposed updates to the standard. The consultation sought feedback from a diverse range of stakeholders, including Programme Partners, Members, Certification Bodies, and other interested, public stakeholders.

We would like to thank all stakeholders for their time, participation, and valuable contributions to the consultation process.

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Process Overview

Background

The BCI P&C are periodically reviewed and updated to ensure that the standard remains relevant, credible, and aligned with evolving sustainability expectations and implementation experience across global cotton-growing contexts.

This revision forms part of BCI's broader work to embrace regenerative agriculture, which has become increasingly integral to BCI's mission. It also supports BCI's wider transition to a certification system by increasing the clarity and auditability of the P&C.

Our approach to regenerative agriculture reflects our commitment to support locally relevant practices and drive continuous improvement - with a specific focus on regenerative outcomes that include restoring and enhancing soil health, advancing water use efficiency, enhancing biodiversity, increasing carbon storage and reducing greenhouse gas emissions.

Tied to this approach is our core belief that efforts to improve the environmental aspects of cotton farming will only be successful if we also improve the social and economic conditions of cotton growing communities.

Based on initial internal and targeted external consultations, as well as an external expert assessment which identified strong alignment between the P&C v.3.1 and core regenerative agriculture practices, the BCI Council approved this revision in March 2025.

Scope, Governance, Decision-Making, & Timelines

Scope of Revision

This revision was conducted in line with **BCI's SSRP v2.2**, which used the **ISEAL Code of Good Practice for Sustainability Systems v1.1** as reference.

As defined by the SSR v2.2 this is the scope of the revision:

“Partial substantive revision: Any substantive amendments to an existing standard and/or substantive changes in some sections of the standard in between the formal 5-years review period, without changing the overall structure, intended outcomes, and/or application of the standard. This can be triggered if changes are required for the standard to remain effective and relevant, based on external or internal changes in the enabling environment or critical stakeholder feedback or learning (e.g. adjustments of organisational strategy, changes in legislation, unintended negative effects of a standard, major feasibility challenges, etc.). Partial substantive revisions can be urgent or regular and follow different procedures respectively.”

Governance & Decision-Making

The following groups were responsible for oversight and delivery of the revision:

- **BCI Standards Team** : Leads and coordinates the revision process, in alignment with BCI's standards procedures.
- **BCI Executive Group**: Approves the initiation of the revision, based on a recommendation from the Senior Director of Standards System Integrity (SSR v2.2, Section 6.1).
- **BCI Internal Steering Team**: Provides technical input, ensures alignment across countries and functions, and supports the assessment of the relevance, feasibility, and credibility of proposed changes. The IST comprises representatives from relevant BCI Secretariat functions and, together with the Standards System Integrity team, is responsible for validating proposed changes prior to submission to the BCI Council.
- **BCI Council**: Approves revisions to the Principles and Criteria based on recommendations from the Senior Director of Standards System Integrity, in accordance with SSR v2.2.

The revision process included stakeholder consultations guided by the requirements of the ISEAL Code of Good Practice for Sustainability Systems. See the section below **Stakeholder Consultations** for more details.

Timelines

The P&C v.3.2 Partial Substantive Revision process launched in June 2025, following approval by the BCI Council in December 2025 and concluded with the launch of P&C v.3.2 on 1 April 2026.

Key milestones in the revision process included:

- **June 2025** – Revision process launched
- **June–October 2025** – Stakeholder Consultations
 - **1–31 August 2025** – Public Consultation via Microsoft Forms survey
 - **Aug–Sep 2025** – Consultation activities including feasibility and auditability checks.
- **Oct–Dec 2025** – Review of consultation feedback and finalisation of proposed updates
- **December 2025** – BCI Council approval of P&C v.3.2
- **April 2026** – Publication of P&C v.3.2

Stakeholder Consultations

Methodology

Stakeholder Consultation Approach and Activities

As part of the Partial Substantive Revision BCI P&C v.3.2, a series of consultation activities were conducted between June and October 2025 to gather input from internal and external stakeholders. The consultation process saw balanced stakeholder participation, and included an assessment of feasibility across implementation contexts, and a review of the clarity, and auditability of proposed requirements.

It included the following activities:

- **Internal consultations (June–October 2025)** with thematic leads across BCI teams including Decent Work, Regenerative Agriculture, Crop Protection, Livelihoods, Gender Equality as well as discussions within the Internal Steering Team (IST) and the Assurance Team.
- A **30-day public consultation survey (August 2025)** open to external stakeholders, inviting feedback on the proposed changes to indicators within the P&C.
- **Programme Partner Heat Maps (August–September 2025)** to assess the feasibility and relevance of proposed changes across different cotton production contexts. These were shared through the IST with Programme Partners across all BCI direct countries¹.
- **Benchmarked Partner Consultations (August–September 2025)** conducted through one-to-one discussions with the BCI Standards and Benchmarking teams with BCI Benchmarking countries.²
- An **auditability check (October 2025)** conducted through an external consultancy with an accredited Certification Body based in a BCI country to assess the clarity and auditability of the proposed revisions.

Stakeholders engaged across all these consultation activities included Programme Partners, Producers, Benchmarked Partners, certification bodies, civil society organisations, retailers and brands, suppliers and manufacturers, researchers, and other sustainability initiatives.

¹ **BCI direct countries:** In these countries, BCI works with Programme Partners to implement the BCISS and work with farmers in meeting the requirements of the P&C. For information, click [here](#).

² **BCI Benchmarking countries:** In these countries, BCI recognises equivalent standards through a benchmarking process, assessing their alignment with the BCISS. BCI oversees this process to ensure continued equivalence with its requirements. For information, click [here](#).

Consideration and Analysis of Stakeholder Feedback

Following the public consultation, comments received were reviewed and analysed by the BCI Standards team. Feedback was then further reviewed by the IST, relevant thematic leads, and the Assurance Team. Proposed revisions were subsequently assessed through an auditability check conducted by an external consultancy, which helped ensure the clarity and auditability of the updated requirements.

The feasibility of each proposed change was assessed using the Public Consultation Survey and the Heat Map ratings. When a change received a positive feasibility rating, it was carried forward for further refinement. Stakeholder comments were then reviewed in detail to strengthen the clarity, feasibility, and auditability of each indicator text and guidance.

Comments addressing similar topics or indicators were grouped together to identify key themes and the most material issues raised by stakeholders. Where possible, suggestions were incorporated to ensure that the majority perspectives were reflected. Changes that were rated as not feasible, or where a significant number of comments indicated strong concerns, were not included in the revision.

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Photo Credit: Better Cotton Initiative / Zeb Winslow. North Carolina, USA. 2017

Key Figures of Participation

Table I. Key Figures from Consultation Activities

Consultation Activity	Participation
Public Consultation Survey	36 responses , representing stakeholders in 12 countries
Programme Partner Heat Maps	42 responses from Programme Partners across nine countries and all farm sizes
Benchmarked Partner Consultations	Five benchmarked partners consulted across five countries
Total external stakeholders consulted	~100 individuals
Total comments received	~150 comments across all consultation channels

Figure I. Public Survey Consultation Stakeholder Representation

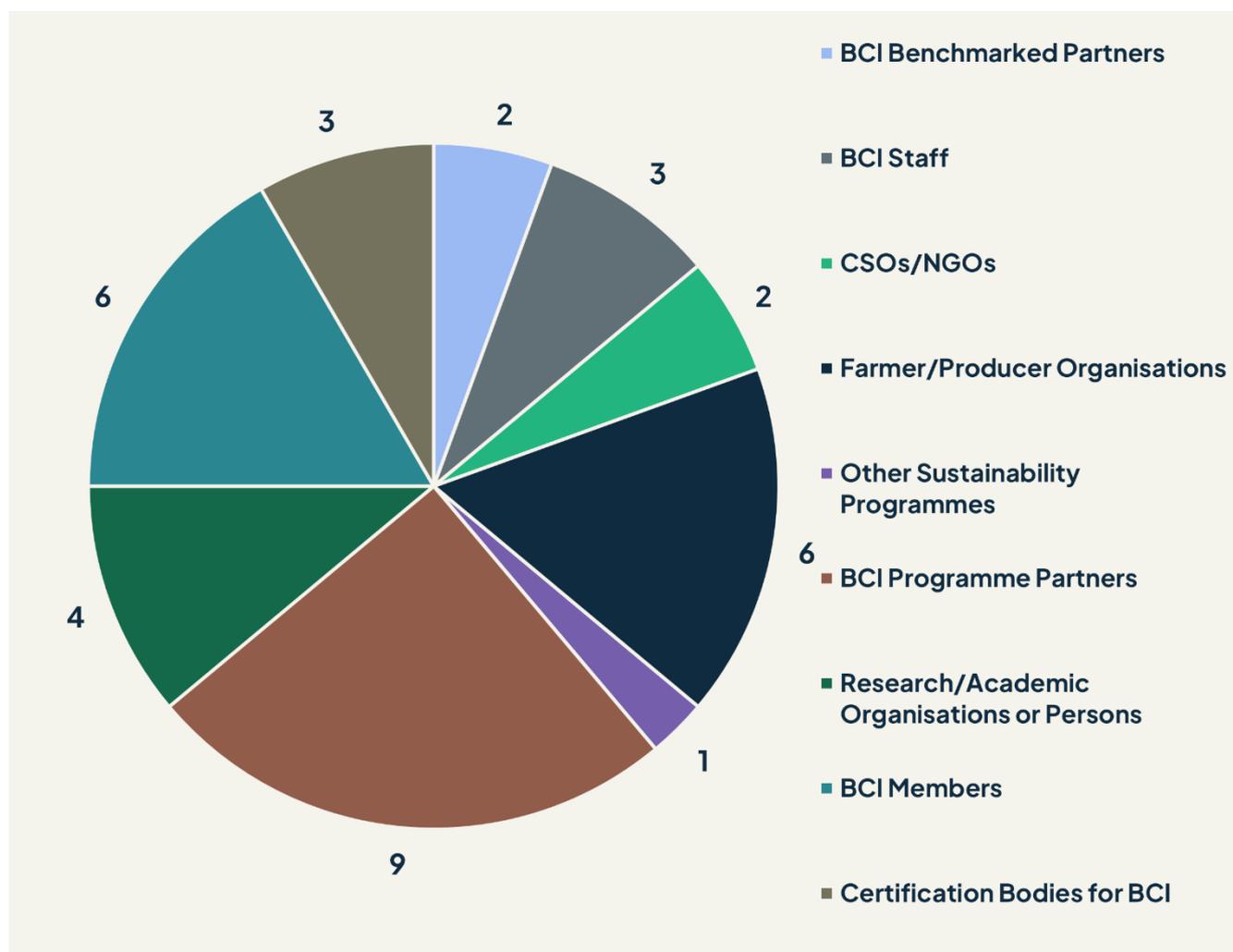
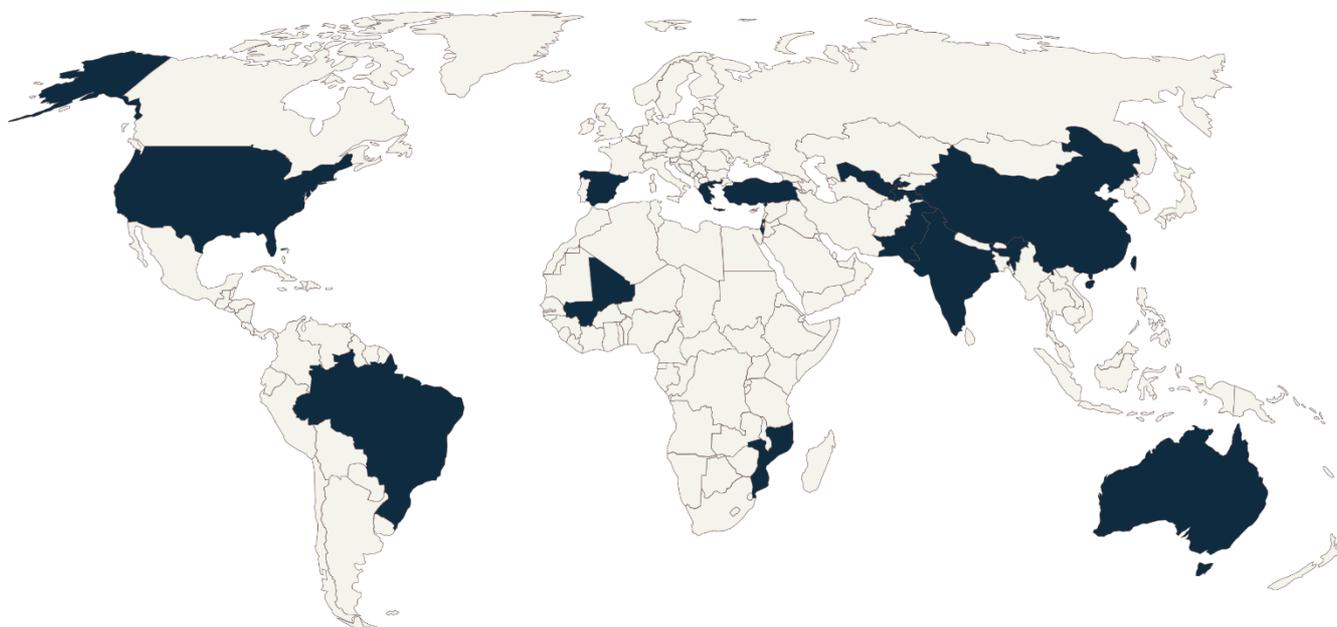


Table II. Geographic Representation

Stakeholders participating in the consultation activities represented a diverse set of cotton-producing contexts.

Consultation Activity	Countries Represented
Programme Partner Consultations	Mozambique, Mali, Pakistan, India, Tajikistan, Uzbekistan, Turkiye, China, United States of America
Benchmarked Partner Consultations	Greece, Brazil, Australia, Israel, Spain

Figure II. Geographic representation of stakeholders consulted



Summary of Feedback and Responses

The sections below summarise the main comments raised and how they were considered in the final revision of P&C v.3.2.

Please see Annex I for a comparison of old and new indicator text and guidance changes between P&C v.3.1 and P&C v.3.2.

Revisions on Regenerative Agriculture

An external review conducted by technical experts identified strong alignment between BCI P&C and core regenerative agriculture practices, particularly in areas such as soil health, biodiversity, water, crop protection, and sustainable livelihoods.

The review also highlighted opportunities to strengthen the Continuous Improvement requirements for key regenerative practices. Based on these findings, the existing Continuous Improvement indicators 1.3.1 (SH, MF) and 1.3.2 (LF) have been updated. During the public consultation, two alternative wording options were proposed for each indicator to further refine their clarity and degree of ambition.

Indicator 1.3.1 (SH, MF)

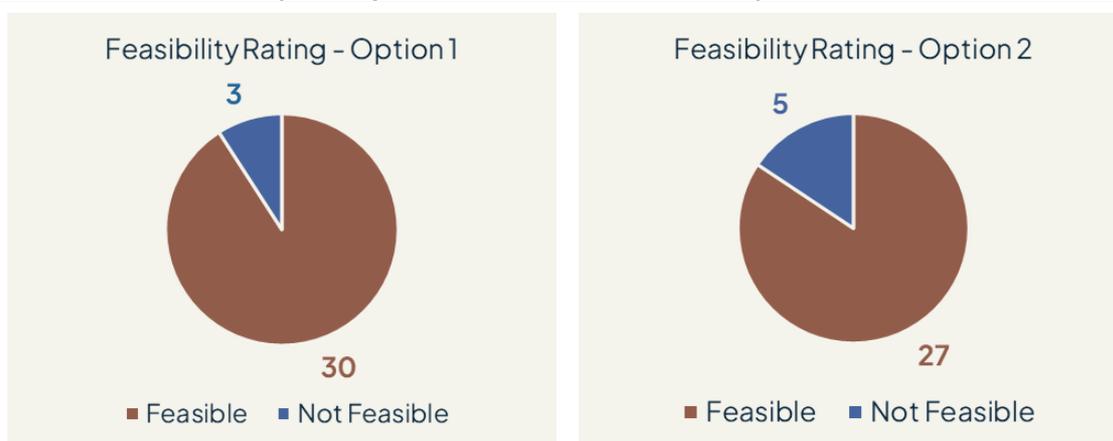
Table III. Proposed change options for Indicator 1.3.1 in Public Consultation Survey

Indicator Text – Option 1	Indicator Text – Option 2
<p>Specific focus areas and respective three-year targets for continuous improvement are set, and annual activities to work towards those targets are fully included and implemented as part of the overall activity and monitoring planning and implementation in Indicators 1.1.1 and 1.1.2. Focus areas consider:</p> <ul style="list-style-type: none"> (i) Locally relevant sustainability priorities and regenerative agriculture indicators 2.1.1, 2.1.2, 2.1.3, 2.1.4, 2.1.5, 2.2.1, 2.2.2, 2.3.1, 2.3.2, 2.3.3, 3.1.2 (ii) Priorities resulting from monitoring activities (Indicator 1.1.2); (iii) Priorities from inclusive field-level consultation as per Indicator 1.1.3 and from the work conducted by the Gender Lead or Gender Committee as well as those responsible for the Decent Work monitoring (Criterion 1.5). 	<p>Specific focus areas and respective three-year targets for continuous improvement are set, and annual activities to work towards those targets are fully included and implemented as part of the overall activity and monitoring planning and implementation in Indicators 1.1.1 and 1.1.2. Focus areas to consider:</p> <ul style="list-style-type: none"> (i) Locally relevant sustainability priorities and regenerative agriculture areas, including improving soil health, enhancing biodiversity and natural habitats, and managing nitrogen, pesticides and water. (ii) Priorities resulting from monitoring activities (Indicator 1.1.2); (iii) Priorities from inclusive field-level consultation as per Indicator 1.1.3 and from the work conducted by the Gender Lead or Gender Committee as well as those responsible for the Decent Work monitoring (Criterion 1.5).

Summary of comments

- Requests for a more balanced approach between regenerative focus areas and other areas, including clearer definition of the number of priority areas to support auditability.
 - Concerns that requiring simultaneous progress across multiple regenerative areas, alongside existing requirements, may be challenging in contexts where not all areas are relevant or where capacity is limited.
 - Requests to improve the clarity and structure of the indicator wording, particularly to support consistent interpretation and auditability where multiple requirements or broadly defined areas are included.
 - A few comments suggested alignment with existing regenerative agriculture standards.
- Comments on Option 1 & 2:**
- Diverging views, with some stakeholders favouring the more detailed approach referencing specific indicators (Option 1), while others preferred the simpler wording of Option 2.
 - Some stakeholders suggested combining elements of both options, for example linking regenerative areas to the relevant indicators in the P&C.

Figure III: Overall Feasibility rating results of the public survey for option 1 & 2 of indicator 1.3.1



Indicator 1.3.2 (LF)

Table III. Proposed change options for Indicator 1.3.2 in Public Consultation Survey

Indicator Text - Option 1	Indicator Text - Option 2
<p>Specific and locally relevant sustainability targets and regenerative agriculture areas are identified to focus on for continuous improvement. The following indicators 2.1.1, 2.1.2, 2.1.3, 2.1.4, 2.1.5, 2.2.1, 2.2.2, 2.3.1, 2.3.2, 2.3.3, 3.1.2. are identified as main regenerative areas and should be covered by the improvement plan. Activities to achieve those targets are implemented and progress is monitored as part of the overall management system in Indicator 1.1.4.</p>	<p>Specific and locally relevant sustainability targets and regenerative agriculture areas are identified to focus on for continuous improvement. The three-year target plan should adopt a holistic approach to regenerative agriculture, including improving soil health, enhancing biodiversity and natural habitats, and managing nitrogen, pesticides and water. Activities to achieve those targets are implemented and progress is monitored as part of the overall management system in Indicator 1.1.4.</p>

Summary of comments

- Concerns that requiring simultaneous progress across multiple regenerative areas, or across the full set of regenerative indicators, alongside existing requirements, may be burdensome in certain contexts and lead to additional compliance challenges.
- Requests to improve the clarity of wording, specifically suggesting the use of the term "regenerative indicators" rather than "areas."
- Questions regarding auditability, particularly how regenerative areas would be interpreted and assessed.

Comments on Option 1 & 2:

- Diverging views, with some stakeholders preferring the more specific approach referencing indicators (Option 1), while others favoured the broader wording of Option 2.
- Some stakeholders suggested combining elements of both options, for example linking regenerative areas to the relevant indicators.

Figure IV: Overall Feasibility rating results of the public survey for option 1 & 2 of indicator 1.3.2



BCI Consideration & Response - Indicators 1.3.1 (SH, MF) and 1.3.2 (LF)

Public consultation confirmed that strengthening the regenerative Continuous Improvement requirement through the existing Continuous Improvement Plan is feasible, subject to minor adaptations.

The final wording was revised following stakeholder feedback and further review with the IST and Assurance Team, adopting a more flexible approach that addresses the majority of concerns raised and utilising elements of both options presented in the public consultation survey by combining the regenerative areas with the relevant indicators. The updated wording has been harmonised across farm contexts, aligning Indicators 1.3.1 (SH, MF) and 1.3.2 (LF).

Key improvements include greater flexibility in prioritising focus areas and setting targets, alongside clearer definition of the number of targets to support a balanced approach between regenerative priorities and other locally relevant objectives. The wording was also enhanced to improve clarity and support consistent interpretation. **Please see the final wordings in [Annex I](#).**

Indicators 2.1.1, 2.1.2, 2.1.3 (SH, MF, LF)

Table IV. Proposed indicator text for 2.1.1–2.1.3 in Public Consultation Survey with changes in bold

Proposed Indicator Text – 2.1.1	Proposed Indicator Text – 2.1.2	Proposed Indicator Text – 2.1.3
<p><u>Producers test and increase over time uptake of locally relevant practices that maximise crop diversity, unless these practices are already implemented at a maximum level.</u></p>	<p><u>Producers test and increase over time uptake of locally relevant practices that maximise soil cover, unless these practices are already implemented at a maximum level.</u></p>	<p><u>Producers test and increase over time uptake of locally relevant practices that minimise soil disturbance, unless these practices</u></p>

Summary of comments

- Concerns regarding the feasibility and auditability of the proposed revisions, particularly that requiring improvement across all three indicators simultaneously could overwhelm producers and hinder compliance with the standard.
- Several comments highlighted implementation challenges across diverse cotton production contexts, where applying all requirements may not be practical or relevant.
- Ambiguity in key terms (e.g. “maximum level of implementation” and “test”) was identified, which may lead to inconsistent interpretation and auditability challenges.
- Internal consultations, including feedback from the Internal Steering Team, reinforced these concerns and highlighted risks related to feasibility and auditability.

BCI Consideration & Response - Indicators 2.1.1, 2.1.2, 2.1.3

Based on stakeholder feedback received through both the public consultation and internal consultations, including input from the Internal Steering Team, the proposed revisions to Indicators 2.1.1, 2.1.2, and 2.1.3 were not adopted. The existing wording of these indicators has therefore been maintained in P&C v.3.2.

Other Revisions

Stakeholders were asked to provide feedback on proposed revisions to individual indicators, with a focus on relevance, feasibility, and auditability. The proposed wording presented during the public consultation survey for each indicator can be made available upon request.

Please see [Annex I](#) for a comparison of old and new indicator text and guidance changes between P&C v.3.1 and P&C v.3.2.

Indicator (Farm Size)	Summary of Comments	BCI Consideration & Response
<p>1.1.1 (SH, MF)</p>	<ul style="list-style-type: none"> • Requests to improve the clarity and structure of the indicator wording. • Questions regarding the implementation and verification of action plans and monitoring activities. • The term “all activities” has prompted concerns and confusion, as it could present a challenge for smallholder and medium-sized farms (SH/MF). • Requests for clarification on how Continuous Improvement Plans (CIPs) should be integrated with activity and monitoring plans. 	<ul style="list-style-type: none"> • The wording "all activities" has been updated with "the activities" to ensure clarity. • The reference to the CIP was moved to the guidance section to clarify that its inclusion in the overall activity plan is a recommendation rather than a requirement.
<p>1.1.5 (SH, MF, LF)</p>	<ul style="list-style-type: none"> • Requests to clarify what is meant by “within the remit of the Standard”, including which laws and regulations are expected to be covered. • Comments highlighting feasibility challenges for Producers, particularly where numerous laws may apply across different jurisdictions. • Questions related to auditability and verification, including how compliance with all applicable laws would be assessed. 	<ul style="list-style-type: none"> • The proposed revision to Indicator 1.1.5 was not adopted following further review with the Internal Steering Team and Assurance Team. • This has been logged for consideration in future revisions.
<p>1.2.2 (SH, MF)</p>	<ul style="list-style-type: none"> • Requests to improve the clarity and structure of the indicator wording. • Comments highlighting potential feasibility challenges, particularly regarding the responsibility placed on Producers for data collection and management. • Questions regarding what 	<ul style="list-style-type: none"> • The wording was revised to clarify that implementing an effective system for data collection, validation, and recording is distinct from the assignment of responsibility. • It was clarified that responsibility for managing the system must be defined within each operational context,

Indicator (Farm Size)	Summary of Comments	BCI Consideration & Response
	<p>constitutes an acceptable data collection or management system, including whether manual systems would be acceptable.</p> <ul style="list-style-type: none"> • Comments noting the importance of recognising existing systems used by Producers and avoiding requirements for specific systems. 	<p>recognising that roles may vary across settings.</p>
<p>1.4.3 (SH, MF)</p>	<ul style="list-style-type: none"> • Requests for clarification on how training effectiveness and outcomes will be measured and monitored. • Suggestions to provide further explanation of what monitoring of training activities entails. 	<ul style="list-style-type: none"> • Following further consultation with the Internal Steering Team, the wording was simplified and clarified. • Details regarding the monitoring and verification processes are now outlined in Assurance documentation.
<p>1.7.1 (SH, MF, LF)</p>	<ul style="list-style-type: none"> • The addition was generally welcomed and viewed as relevant and timely • Questions regarding how the requirement will be measured and monitored. • Comments highlighting the need for support and capacity strengthening to enable Producers to address climate risks. Including requests for further clarification on implementation of climate risk assessment and adaptation measures, including alignment with other indicators and country-specific contexts. 	<ul style="list-style-type: none"> • The indicator wording proposed in the public consultation was adopted, based on high feasibility ratings from the Public Consultation Survey and Heat Maps. • BCI will address the need for additional local guidance and support in the upcoming financial year.
<p>2.3.1 (SH, MF, LF)</p>	<ul style="list-style-type: none"> • Questions regarding how the requirement would be measured and monitored as measurement of water quality was flagged as a feasibility issue. • Requests to review the clarity and terminology of the indicator wording, including suggestions to consider alignment with existing frameworks and concepts related to water ecosystems. 	<ul style="list-style-type: none"> • The indicator wording proposed in the public consultation was adopted, as it does not alter the intent of the indicator. • It is clarified in Assurance documentation that measuring water quality is not a mandatory requirement; however, Producers may undertake such measurements where relevant and feasible, as the main intent of this Indicator is on implementing measures to protect water quality.

Indicator (Farm Size)	Summary of Comments	BCI Consideration & Response
<p>3.1.6 (SH, MF)</p>	<ul style="list-style-type: none"> • Requests for clarification on the definition and measurement of economic threshold levels (ETL). Stakeholders also noted that ETLs may not be available in all country contexts. • Comments related to auditability and indicator structure, including suggestions to separate requirements related to pesticide use at ETL and pesticide toxicity. 	<ul style="list-style-type: none"> • The indicator wording was revised to align with Indicator 3.1.7 and to clarify that pest management decisions should be based on economic threshold levels (ETLs) or other defined pest thresholds, recognising that ETLs may not be available in all contexts. • The suggestion to split the indicator was not adopted. Monitoring requirements are already addressed under Indicator 3.1.4, and separating the requirements would create duplication and increase the number of indicators, affecting the structure of the P&C. Instead, indicator guidance was clarified to support interpretation and auditability.
<p>3.2.1 (SH, MF, LF)</p>	<ul style="list-style-type: none"> • Comments highlighting practical challenges related to pesticide mixtures, including situations where regulations on mixtures are absent or where product information may be difficult to obtain through local markets. 	<p>The indicator wording proposed in the public consultation was adopted, as it clarifies how the requirement should be applied where national regulations on pesticide mixtures do not exist, thereby improving auditability.</p>
<p>3.3.1 (SH, MF, LF)</p>	<p>Comments related to implementation of pesticide management requirements, including concerns about complexity of chemical lists and feasibility of restrictions in some production contexts.</p>	<p>The indicator wording proposed in the public consultation was adopted, as it does not change the intent of the requirement and was introduced to improve clarity.</p>
<p>3.5.2 (MF, LF)</p>	<p>Requests for additional guidance on responsible handling of pesticides.</p>	<p>The indicator wording proposed in the public consultation was adopted, as it does not change the intent of the requirement and was introduced to improve clarity.</p>
<p>3.5.6 (SH, MF, LF)</p>	<ul style="list-style-type: none"> • Requests to clarify the scope of the requirement, particularly whether it applies only to pesticide containers or also to other agrochemical containers such as fertilisers. • Comments highlighting implementation challenges in some contexts, particularly where recycling 	<p>The indicator wording proposed in the public consultation was adopted, as it clarifies that the requirement applies to pesticide containers, ensuring alignment between the indicator text and guidance.</p>

Indicator (Farm Size)	Summary of Comments	BCI Consideration & Response
	or supplier buy-back schemes are not widely available.	
3.5.7 (SH)	A broader comment suggested expanding guidance on herbicide use, weed management, and ecological alternatives to agrochemicals.	The indicator wording proposed in the public consultation was adopted, as it does not change the intent of the requirement and was introduced to improve clarity. The comment is logged for consideration in future revisions.
5.1.1 (SH, MF, LF)	<ul style="list-style-type: none"> • Requests to clarify what constitutes an “effective” system, including suggestions to provide further explanation in the guidance. • Questions regarding the scope of the requirement, including whether it applies only to labour rights or also to broader community rights. • Comments noting potential implementation challenges in establishing such systems. 	The feedback was adopted and clarification was added on what constitutes an ‘effective’ system and Indicator guidance was expanded for clarity.
5.1.2 (SH, MF)	<ul style="list-style-type: none"> • Requests to improve the clarity and structure of the guidance wording, including the flow of statements and terminology used. • Questions regarding the scope of the grievance mechanism, particularly which issues it is expected to cover. • Comments highlighting implementation and feasibility considerations, including whether mechanisms need to be formalised and the need for practical guidance for smallholder and medium farm contexts. 	Minor clarifications were introduced in the guidance wording to improve clarity and flow and address questions raised during consultation. These adjustments were made without changing the intent of the requirement.
5.1.3 (SH, MF)	<ul style="list-style-type: none"> • Requests to improve the clarity of the indicator wording, particularly regarding protection and remediation following labour rights violations. • Comments highlighting implementation challenges, particularly for smallholder contexts, including confidentiality requirements and remediation processes. • Observations that in some contexts existing labour legislation or worker 	Minor clarifications were introduced in the guidance wording to improve clarity and flow and address questions raised during consultation. These adjustments were made without changing the intent of the requirement.

Indicator (Farm Size)	Summary of Comments	BCI Consideration & Response
	representation mechanisms already address these issues.	
5.1.4 (LF)	<ul style="list-style-type: none"> • Requests to improve the clarity and accessibility of the guidance wording. <ul style="list-style-type: none"> • Comments highlighting implementation challenges, particularly regarding how large farms can ensure meaningful stakeholder input in grievance mechanisms. • Observations that in some contexts existing labour legislation and worker representation mechanisms may already address these issues. 	<ul style="list-style-type: none"> • Minor clarifications were introduced in the guidance wording to improve clarity and flow and address questions raised during consultation. These adjustments were made without changing the intent of the requirement. • Other comments are logged for consideration for future revisions.
5.2.1 (SH, MF, LF)	<ul style="list-style-type: none"> • Requests to clarify the scope and wording of the indicator, including how the requirement relates to international labour standards and different worker categories. • Comments highlighting implementation and feasibility considerations, particularly for smallholder contexts and in situations where literacy, language, or cultural barriers may exist. • Requests for additional guidance or supporting materials, including examples of training approaches, monitoring of worker understanding, and clarification on how the requirement would be verified. 	<ul style="list-style-type: none"> • Minor clarifications were introduced in the guidance wording to improve clarity and flow and address questions raised during consultation. These adjustments were made without changing the intent of the requirement. • Other comments are logged for consideration for future revisions.

Further Information

Better Cotton Initiative (BCI) welcomes continued engagement from stakeholders on the development and implementation of its standards. Feedback received through consultation activities plays an important role in ensuring that the BCI P&C remain relevant, credible, and feasible across diverse cotton production contexts.

The final version of the [Better Cotton Initiative Principles and Criteria v.3.2](#) and related [Reference Documents](#) are available on our website.

Stakeholders who wish to provide additional feedback or request further information about the revision process may contact the BCI Standards team at: standards@bettercotton.org



Photo Credit: Better Cotton Initiative/Khula Jamil. Rahim Yar Khan, Punjab, Pakistan. 2019.

Annex I – Comparison of P&C v.3.1 and v.3.2

Tab I. Change to Indicator Text: Comparison of P&C v.3.1 and P&C v.3.2 with changes in bold

Indicator (Farm Size)	P&C v3.1 Indicator Text	P&C v3.2 Indicator Text
1.1.1 (SH, MF)	A clear and locally relevant activity plan is developed and implemented for the Producer Unit, which: (i) Is kept up to date and includes all activities, timelines and responsibilities; (ii) Is reviewed at least annually, taking into consideration the findings of the monitoring activities.	A clear and locally relevant activity plan is developed and implemented for the Producer Unit, which: (i) Includes the activities related to the implementation of the Better Cotton Initiative Programme, timelines and responsibilities; (ii) Is understood by the Producer Management and communicated to Producer Unit Staff; (iii) Is reviewed and adjusted at least annually, taking into consideration the learnings from monitoring activities (Indicator 1.1.1), field-level consultations (Indicator 1.1.3), priorities related to Climate Change (Criterion 1.7) and recommendations from the Gender Lead or Gender Committee (Criterion 1.5).
1.1.5 (SH, MF, LF)	The Producer complies with all applicable laws and regulations.	The Producer complies with all applicable laws and regulations.
1.2.2 (SH, MF)	In line with the Better Cotton Farm Data Requirements Document, accurate and complete farm-level data is collected, validated and recorded.	In line with the Better Cotton Initiative Farm Data Requirements Document, the Producer has a system in place to collect, validate and record accurate farm-level data. The Producer ensures that the roles and responsibilities for collection, validation and recording are clearly defined.
1.3.1 (SH, MF)	Specific focus areas and respective three-year targets for continuous improvement are set, and annual activities to work towards those targets are fully included and implemented as part of the overall activity and monitoring planning and implementation in Indicators 1.1.1 and 1.1.2. (i) Locally relevant sustainability priorities;	At least five locally relevant four-year targets for continuous improvement and respective annual activities are identified. (i) At least three of these targets shall aim to develop regenerative agriculture in the following areas: soil health, biodiversity and natural habitats, water, pesticides, fertilisers, and/or livestock; (ii) The targets shall address local sustainability hotspots or priorities and should be identified through results from monitoring activities (see Indicator 1.1.2), input from

	<p>(ii) Priorities resulting from monitoring activities (Indicator 1.1.2);</p> <p>(iii) Priorities from inclusive field-level consultation as per Indicator 1.1.3 and from the work conducted by the Gender Lead or Gender Committee (Criterion 1.5). ‘</p> <p>*Applicable to PUs from the second certification cycle</p>	<p>field-level consultations (see Indicator 1.1.3) and from the work conducted by the Gender Lead or Gender Committee (Criterion 1.5);</p> <p>(iii) The annual activities identified to achieve the four-year targets shall be implemented, and the Producer shall measure progress and monitor the effectiveness.</p>
<p>1.3.2 (LF)</p>	<p>Specific and locally relevant sustainability targets are identified to focus on for continuous improvement. Activities to achieve those targets are implemented and progress is monitored as part of the overall management system in Indicator 1.1.4.</p>	<p>At least five locally relevant four-year targets for continuous improvement and respective annual activities are identified.</p> <p>(i) At least three of these targets shall aim to develop regenerative agriculture in the following areas: soil health, biodiversity and natural habitats, water, pesticides, fertilisers and/or livestock;</p> <p>(ii) The targets shall address local sustainability hotspots or priorities and should consider input from workers and/or community stakeholders, corrective actions from past assessments or audits and learnings from self-assessments;</p> <p>(iii) The annual activities identified to achieve the four-year targets shall be implemented, and the Producer shall measure progress and monitor the effectiveness.</p>
<p>1.4.3 (SH, MF)</p>	<p>Participants understand the relevance and benefits of knowledge, skills and practices promoted through training and other related activities.</p>	<p>The Producer shall ensure and monitor that activities to strengthen capacities are effective at enhancing the knowledge, skills and practice adoption of the participants.</p>
<p>1.7.1 (SH, MF, LF)</p>	<p>The Producer is aware of locally relevant climate change adaptation measures and implements these in line with the activity and monitoring plans.</p>	<p>The Producer is aware of locally relevant climate change risks and adaptation measures and implements these in line with the activity and monitoring plans.</p>
<p>2.3.1 (SH, MF, LF)</p>	<p>Measures are implemented to protect water bodies.</p>	<p>Measures are implemented to protect the quality, availability, and related biodiversity of water bodies.</p>
<p>3.1.6 (SH, MF)</p>	<p>Pesticides are only used if a certain threshold of pests is reached. If pesticides are used:</p> <p>(i) Low toxicity active ingredients are preferred;</p> <p>(ii) They are selected and applied in a way to mitigate resistance.</p>	<p>Pesticides are only used when a defined pest threshold, such as an Economic Threshold Level (ETL) where these are available and applicable, is reached. If pesticides are used:</p> <p>(i) Low toxicity active ingredients are preferred;</p> <p>(ii) They are selected and applied in a way to mitigate resistance.</p>
<p>3.5.6 (SH, MF, LF)</p>	<p>Disposal of agrochemical containers minimises risks to human health and the environment. Farmers participate in recycling or return to supplier programmes where they exist.</p>	<p>Disposal of pesticide containers minimises risks to human health and the environment. Farmers participate in recycling or return to supplier programmes where they exist.</p>

<p>5.1.1 (SH, MF, LF)</p>	<p>A system is in place to regularly monitor risks and incidents of labour rights violations. In that system: (i) Individual(s) responsible for the monitoring system are clearly identified and farmers and workers are represented in the operation of the monitoring system; (ii) Where risks are identified, prompt actions are taken to address these and prevent their escalation. *Applicable to LF with over 25 workers</p>	<p>An effective system is in place to regularly monitor risks and incidents of labour rights violations. In that system: (i) Individual(s) responsible for the monitoring system are clearly identified and farmers and workers are represented in the operation of the monitoring system; (ii) Where risks are identified, prompt actions are taken to address these and prevent their escalation. *Applicable to LF with over 25 workers</p>
<p>5.1.3 (SH, MF)</p>	<p>Where labour rights violations occur, victims have access to protection and remediation. Confidentiality and safety of victims are protected throughout the process.</p>	<p>In cases of labour rights violations, the Producer ensures the following: (i) Affected workers shall have access to protection and remediation when labour rights violations occur; (ii) Their confidentiality and safety shall be safeguarded throughout the process.</p>
<p>5.2.1 (SH, MF, LF)</p>	<p>Farmers and workers understand their fundamental principles and rights at work. These include their rights to: (i) Freedom of association and collective bargaining; (ii) A safe and healthy working environment; (iii) Protection from discrimination, forced or compulsory labour and child labour.</p>	<p>Producers have systems in place to ensure that all farmers and workers understand their fundamental principles and rights at work. These include their rights to: (i) Freedom of association and collective bargaining; (ii) A safe and healthy working environment; (iii) Protection from discrimination, forced or compulsory labour and child labour.</p>

Tab II. Change to Indicator Guidance: P&C v.3.1 wording

<p>Indicator (Farm Size)</p>	<p>P&C v.3.1 Indicator Guidance</p>
<p>1.3.1 (SH, MF)</p>	<p>The intent is for the Producer to ensure continuous improvement in sustainability areas that are relevant to the local context and people. PUs have the flexibility to select issues that are the most urgent and meaningful in their local context, using results from monitoring activities, local sustainability hotspots or priorities as well as input from field-level consultations (see Indicator 1.1.3), including on gender equality and climate change issues. Consideration should also be given to: P&C Indicators that incorporate a continuous improvement element, non-compliances and respective corrective actions from past assessments or audits and conditions related to granted exceptional use of Highly Hazardous Pesticides (HHPs). The Gender Lead or Gender Committee as well as the individual(s) responsible for Decent Work (DW) monitoring should be included in decision-making for continuous improvement areas. While there might be overlaps between continuous improvement focus areas and P&C requirements, PUs are encouraged to consider sustainability areas that go beyond the P&C v.3.1. They should also try to limit the number of continuous improvement areas to around three to five to enable more focus,</p>

	<p>resources and progress. Continuous improvement targets, activities and monitoring are to be integrated into the PU's overall planning and monitoring systems in Indicators 1.1.1 and 1.1.2. For PUs that never had any Better Cotton license or certification before, this Indicator will only be assessed once they enter their second certification cycle (typically year three or four of participation). The PUs should use this first certification cycle to identify the key areas and targets, which then will be assessed during the second certification cycle. Note that for PUs that already have a license or a certificate, and/or that had one in the past, this Indicator is applicable without exceptions.</p>
1.3.2 (LF)	<p>The intent is for the Producer to commit to making sustainability improvements over time, in areas that are relevant for the local context and people. Producers are expected to go beyond basic compliance with the requirements in the P&C v.3.1 and identify key areas where they can further improve their sustainability impacts. Specific focus areas for continuous improvement can be defined by the Producers themselves, giving flexibility to the most urgent and meaningful issues in their local context. The selection of focus areas should consider local sustainability hotspots or priorities, input from workers and/or community stakeholders and consider topics related to gender equality and climate change issues. Farmers should be able to explain how they identified these focus areas, the specific activities planned and completed and how they are monitoring progress. They are encouraged to limit the number of continuous improvement areas to around two to three to enable more focus, resources and progress.</p>
3.2.1 (SH, MF, LF)	<p>The intent is for the Producer to have systems in place to minimise the harmful effects of pesticides by ensuring pesticides are nationally registered, clearly labelled and any mixtures are approved for use. Registered pesticides are those for which a relevant regulatory authority has assessed the risks of use for specific crop(s) and has developed crop-specific directions for use. The labels provided with legally registered pesticides contain important information regarding the properties of the product, directions for use and specific precautions or measures to be followed. Pesticide labels should be in at least one de facto or de jure official national or regional applicable language. Farmers should be able to understand label directions and confirm that all pesticides are applied in line with label instructions. Pesticide mixtures include commercial products containing multiple active ingredients as well as cases where farmers combine pesticides on the farm (for example, pesticide cocktails or tank mixes). Using pesticide mixtures can increase risks to human health, reduce efficacy of individual ingredients in some cases or lead to other adverse effects, since the combined ingredients are not subject to testing as they are through a registration process. When pesticides are mixed on site, appropriate safeguarding measures and use of personal protective equipment (PPE) should be in place. A record of natural substances used for pest and disease control should be maintained, especially in countries where there is no registration process. Further reference: European Union, Regulation (EC) No 1272/2008 - classification, labelling and packaging of substances and mixtures (CLP)</p>
3.3.1 (SH, MF, LF)	<p>The intent is for the Producer to ensure pesticides that are considered as most hazardous to human health or the environment shall not be used on cotton sold under this standard. Pesticides considered prohibited under this Indicator include those in Annex A and B of the Stockholm Convention, Annexes of the Montreal Protocol or Annex III of the Rotterdam Convention. These are all international, multilateral agreements that aim to eliminate or restrict use of the most dangerous pesticides and compounds. Prohibited pesticides also include those defined as 'acute toxic' category 1 or 2 of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) or under 1a and 1b of the WHO classification. Producer Management should make sure that those buying and applying pesticides are aware of the pesticides that are prohibited or targeted for phase-out under</p>

	<p>the P&C v.3.1. Activities to ensure this can include training on how to read pesticide labels, providing hazardous pesticide lists in local languages, using pictograms on pesticide labels and more. Where prohibited pesticides do not yet have viable alternatives, their exceptional use may be permitted by Better Cotton through the established exceptional use process. The exceptional use process provides a rigorous and transparent evaluation of requests, including evaluation of viable alternatives, use of mitigation measures and steps taken to reduce or phase out use over time. If exceptional use of pesticides is permitted in specific cases, any agreed conditions shall be strictly followed and reported. Further reference: Better Cotton Highly Hazardous Pesticides Exceptional Use Procedure Better Cotton Prohibited Pesticides List</p>
<p>3.5.2 (MF, LF)</p>	<p>The intent is for the Producer to ensure that harm to human health of those using and handling pesticides is minimised through careful and consistent use of appropriate PPE. The best option to protect humans from pesticide exposure is to avoid pesticides altogether, then to minimise their use and choose fewer toxic options. When there is no alternative to pesticide use, good quality appropriate PPE can help reduce risks to human health, but only if worn and maintained properly. Pesticide exposure can occur via the mouth (oral exposure), skin (dermal) or breathing (inhalation). Using pesticides, in the context of this Indicator, includes all activities conducted during field application (e.g., spraying, seed treatment, granule/powder application, fumigation and others). Handling, in the context of this Indicator, includes all activities related to the storage, preparation, maintenance and disposal of pesticides and its related equipment and material, including activities such as storing, mixing, diluting, measuring, transferring pesticides, preparing and maintaining equipment and materials as well as the disposal of waste and materials. Better Cotton Principles & Criteria Version 3.1 Principle 3: Crop Protection 53 Whenever the P&C v.3.1 refers to farmers and/or workers, it includes all individuals regardless of gender, background or identity. For more information, see our Commitment to Social Inclusion and definitions of farmers and workers. All individuals handling pesticides should have access to appropriate PPE, and it should be used in line with the label instructions of the pesticides in use. Labels should be checked regularly (at least every spray season), and all individuals should receive training on the importance of PPE and proper use and maintenance. PPE should be checked regularly for wear and tear and replaced if required. Where relevant, the Producer Management should consult and collaborate with the Gender Lead or Gender Committee to implement this Indicator.</p>
<p>3.5.7 (SH)</p>	<p>The intent is for the Producer to have systems in place that help maximise the effectiveness of pesticide application and address the risks to human health and the environment by using correct equipment and practices. Farmers should monitor weather conditions before spraying, including wind speed and direction, temperature, humidity and atmospheric stability. For example, pesticides should not be applied right before rain since this can reduce effectiveness and increase risks of runoff and contamination. The risks of pesticide drift should also be considered. Wind and higher temperatures can increase drift (as evaporation of water-based substances is faster in higher temperatures, leading to smaller droplets that drift more easily). Application equipment is designed to be operated under certain parameters and should be appropriate for the specific pesticides used. The equipment should also be in good condition, with no leaks or worn components. Equipment should be cleaned after each use to reduce the risk of contamination and to keep it in good working order. In the handling of pesticides and application equipment, particular consideration should be given to avoid adverse effects to humans and the environment (for example, mitigating the risk that children can get a hold of the materials, the risk of spills to wells used for drinking water, etc.).</p>

	Further reference: FAO, 'Pesticide application guidelines' web page FAO, Guidelines on Good Practices for Ground Application of Pesticides (2001)
5.1.1 (SH, MF, LF)	<p>The intent is for the Producer to establish and maintain an effective system to proactively identify, monitor and mitigate risks of labour rights violations. By addressing risks before they escalate into actual violations, such systems help safeguard workers' rights and will support the Producer in meeting all requirements under this Principle. Better Cotton recognises the challenges of ensuring decent work in agriculture, where labour rights violations are often hidden and difficult to detect. This Indicator promotes an 'assess and address' approach, shifting the focus from detecting violations after they occur to anticipating, mitigating and remediating risks in a structured and proactive manner. The Indicator emphasises the importance of:</p> <ol style="list-style-type: none"> 1. Understanding Risks: Engaging with farming communities to understand their workforce's characteristics and identify context-specific labour rights risks. 2. Designing Monitoring Systems: Establishing or strengthening monitoring systems, including community-based approaches where relevant. 3. Mitigating Risks: Implementing practical measures to mitigate risks and improve working conditions. Note that part of risk mitigation might overlap with remediation measures, as covered in 5.1.3. Effective labour monitoring and remediation systems can incorporate: worker profiles, surveys and focus groups with farmers and workers, farm visits and worker interviews during labour-intensive periods of cotton production and consultations with community stakeholders (e.g., schools, local government or women groups). The system should cover labour rights under Principle 5: Decent Work, including the ILO's Fundamental Principles and Rights at Work (freedom of association and collective bargaining, forced labour, child labour, discrimination and safety and health). Better Cotton Principles & Criteria Version 3.1 Principle 5: Decent Work 63 Whenever the P&C v.3.1 refers to farmers and/or workers, it includes all individuals regardless of gender, background or identity. For more information, see our Commitment to Social Inclusion and definitions of farmers and workers. By fostering community involvement, the monitoring system is better equipped to identify nuanced risks and implement practical, contextually relevant and sustainable solutions. While Producer Management remains accountable for effective implementation of the system, the responsibility to ensure effective oversight and implementation can be assigned to either an individual or a group (e.g., a committee). Whenever formally selected worker representatives are in place, they should be included as members of this committee. The system should account for differing risks for diverse groups of people, especially women and people in vulnerable situations and/or facing exclusion. The individual or committee should regularly consult and cooperate with the Gender Lead or Gender Committee.
5.1.2 (SH, MF)	<p>The intent is for the Producer to ensure all workers carrying out field-level production work on cotton farms have access to impartial, effective and secure channels to raise concerns about labour rights violations and to have these concerns reviewed, responded to and addressed. A grievance mechanism in the context of this Indicator should allow all workers to make a complaint on any issue or concern about their labour rights as covered in this Principle, including cases of child labour, forced labour, discrimination, workplace violence and harassment, interference in the freedom to associate, substandard working conditions, abusive recruitment practices and other potential labour rights violations. When workers are provided with a way to voice their concerns and be heard, their vulnerability to exploitation is reduced. Impartial channels ensure that workers can raise concerns without bias or undue influence. Effectiveness in this context means that the channel achieves its intended purpose, enabling workers to report violations and, in line with criterion 5.1.3, have them addressed. Security ensures that workers can use the</p>

	<p>channel without fear of retaliation, intimidation or harm, with measures in place to protect their confidentiality. It is important to ensure grievance mechanisms are also accessible for people in vulnerable situations and/or facing exclusion. A channel to raise concerns can be referred to as a grievance mechanism, though the specific terminology might vary. This Indicator focuses solely on grievances raised by Better Cotton workers regarding labour rights violations. Producer Management does not need to establish a separate channel exclusively for workers but can use and refer to existing credible grievance mechanisms where they exist. In such cases, the Producer should ensure workers are aware of and able to access them. In some cases, existing grievances mechanisms might need to be supplemented, strengthened or adapted to work effectively in the context of some or all groups of workers involved in the PU. Better Cotton Principles & Criteria Version 3.1 Principle 5: Decent Work 64 Whenever the P&C v.3.1 refers to farmers and/or workers, it includes all individuals regardless of gender, background or identity. For more information, see our Commitment to Social Inclusion and definitions of farmers and workers. The Gender Lead or Gender Committee should be involved for gender-related grievances and to ensure inclusive access to grievance mechanisms and a gender-sensitive resolution process.</p> <p>Further reference: UN Guiding Principles on Business and Human Rights, Guiding Principle 31 (2011)</p>
<p>5.1.3 (SH, MF)</p>	<p>The intent is for the Producer to establish policies and procedures that ensure that any victims of labour rights violations can access protection and remediation. Remediation refers to the process of making things right – the aim is to help restore the victim, as much as possible, to their previous state before any harm was done. Labour rights violations refer to all aspects mentioned in the scope of this Principle, including cases of child labour or forced labour, discrimination, workplace violence and harassment, interference with freedom of association and collective bargaining, substandard working conditions or abusive recruitment practices. In the context of this Indicator, protection means safeguarding victims from further harm, intimidation or retaliation, while ensuring their confidentiality and safety. In practice, this involves ensuring physical safety, connecting victims to relevant services (e.g., child protection, healthcare or legal aid) or providing social support, such as housing or other immediate assistance for those at risk. In the context of this Indicator, remediation encompasses both corrective and preventative actions. It involves addressing the immediate impacts of any identified violations, while also implementing measures to prevent the recurrence of harm. This may include strengthening management systems, revising policies and practices and initiating targeted interventions to address the root causes of issues in collaboration with relevant stakeholders such as farmers, workers and their representative organisations (e.g., farmer producer organisations and trade unions), government stakeholders and other relevant civil society organisations. Remediation should be relevant and proportionate to the nature of the violation. This can include measures such as clarifying the facts of the situation, apologies, offering support or (financial or non-financial) compensation to the affected individual(s), appropriate sanctions or punishments to the offenders and implementing measures to address the underlying issue and prevent recurrence. Better Cotton Principles & Criteria Version 3.1 Principle 5: Decent Work 65 Whenever the P&C v.3.1 refers to farmers and/or workers, it includes all individuals regardless of gender, background or identity. For more information, see our Commitment to Social Inclusion and definitions of farmers and workers. Producers are not necessarily required to provide remediation themselves in all cases, but they should ensure that adequate processes are in place for timely and relevant referrals to credible organisations or structures that can provide remedy. Timely in this context means without undue delay, based on the severity and urgency of the issue. For</p>

	<p>example, where a worker's safety is at immediate risk, the response should be prompt to mitigate further harm. For less urgent cases, such as structural problems, the system should have a clear timeline for resolution. In some cases, labour rights violations amount to a criminal offense and should be dealt with in accordance with the complainant's wishes and within the framework of local criminal law. If requested and whenever possible, the Producer should support the complainant in accessing legal remedy. The Gender Lead or Gender Committee should be involved for gender-related grievances and to ensure inclusive access to grievance mechanisms and a gender-sensitive resolution process.</p>
<p>5.1.4 (LF)</p>	<p>The intent is for the Producer to ensure all workers carrying out field-level production work on cotton farms have access to impartial, effective and secure channels to raise concerns about labour rights violations and to have these concerns reviewed, responded to and addressed. This includes protection and remediation in cases where labour rights violations occur. A grievance mechanism in the context of this Indicator should allow all workers to make a complaint on any issue or concern about their labour rights as covered in this Principle, including cases of child labour, forced labour, discrimination, workplace violence and harassment, interference in the freedom to associate, substandard working conditions, abusive recruitment practices and other potential labour rights violations. Impartial channels ensure that workers can raise concerns without bias or undue influence. Effectiveness in this context means that the channel achieves its intended purpose, enabling workers to report violations and have them addressed. Security ensures that workers can use the channel without fear of retaliation, intimidation or harm, with measures in place to protect their confidentiality. This Indicator focuses solely on grievances raised by Better Cotton farm workers regarding labour rights violations. Producer Management does not need to establish a separate channel exclusively for workers but can use and refer to existing, credible grievances mechanisms where they exist. In such cases, Producer Management should ensure workers are aware of and able to access them. Better Cotton Principles & Criteria Version 3.1 Principle 5: Decent Work 66 Whenever the P&C v.3.1 refers to farmers and/or workers, it includes all individuals regardless of gender, background or identity. For more information, see our Commitment to Social Inclusion and definitions of farmers and workers. In the context of this Indicator, remediation encompasses both corrective and preventative actions. It involves addressing the immediate impacts of any identified violations, while also implementing measures to prevent the recurrence of harm. This may include strengthening management systems, revising policies and practices and initiating targeted interventions to address the root causes of issues in collaboration with relevant stakeholders, such as farmers, workers and their representative organisations (e.g., farmer producer organisations and trade unions), government stakeholders and other relevant civil society organisations. In some cases, labour rights violations amount to a criminal offense and should be dealt with in accordance with the complainant's wishes and within the framework of local criminal law. If requested and whenever possible, the Producer should support the complainant in accessing legal remedy. The Gender Lead or Gender Committee should be involved for gender-related grievances and to ensure inclusive access to grievance mechanisms and a gender-sensitive resolution process. Further reference: UN Guiding Principles on Business and Human Rights, Guiding Principle 31 (2011)</p>
<p>5.2.1 (SH, MF, LF)</p>	<p>The intent is for the Producer to have systems in place to ensure that all workers understand their fundamental rights at work. Once workers understand their rights, they are better able to advocate for these rights and seek support or remedy when their rights are violated. Producers are responsible for conducting training, awareness raising and other activities to ensure workers have a good understanding of their rights. Collaborations with other local organisations working on labour issues and supporting farm workers, as well as with the</p>

	Gender Lead or Gender Committee, are strongly encouraged. Further reference: ILO, Declaration on Fundamental Principles and Rights at Work (adopted in 1998 and amended in 2022)
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Tab III. Change to Indicator Guidance: P&C v.3.2 wording with changes in bold

Indicator (Farm Size)	P&C v.3.2 Indicator Guidance
1.3.1 (SH, MF)	<p>The intent is for the Producer to develop a strategy for continuous improvement in regenerative agriculture and locally relevant sustainability areas that prioritise field-level activities. Continuous improvement targets should go beyond the P&C v.3.2 and should aim to increase awareness and good practices adoption over time. Continuous improvement in regenerative agriculture and locally relevant sustainability areas can not only produce environmental benefits but can also help farmers reduce input costs and improve resilience . Soil health is recognised as a key area for resilience in regenerative agriculture and climate change and is strongly encouraged as a focus. Targets identified to improve regenerative agriculture areas can be based on, but not limited to, the following indicators: soil health (e.g., 2.1.1, 2.1.2, 2.1.3, 2.3.3), biodiversity and natural habitats (e.g., 2.3.1, 2.3.2, 2.3.3, 2.4.1), water (e.g., 2.2.1, 2.2.2), pesticides (e.g., criterion 3.1., 3.3), fertilisers (e.g., 2.1.4, 2.1.5), and livestock (e.g., 2.1.5). Annual activities are identified to support the achievement of each four-year target, for example through raising awareness, capacity-strengthening initiatives, demo plots and the implementation of locally relevant good practices. The annual activities identified to achieve the four-year targets shall be implemented. The Producer shall measure progress and monitor the effectiveness of these activities. Continuous improvement targets, respective annual activities and monitoring may be integrated into the PU’s overall planning and monitoring systems in Indicators 1.1.1 and 1.1.2. They should be clearly identified as part of the continuous improvement plan. The targets and their respective annual activities may be reviewed and adapted, if relevant, with appropriate justification. Us have the flexibility to select issues that are the most urgent and meaningful in their local context, using results from monitoring activities, local sustainability hotspots or priorities as well as input from field-level consultations (see Indicator 1.1.3), including on gender equality and climate change issues. Consideration should also be given to: P&C Indicators that incorporate a continuous improvement element, non-compliances and respective corrective actions from past assessments or audits and conditions related to granted exceptional use of Highly Hazardous Pesticides (HHPs). The Gender Lead or Gender Committee as well as the individual(s) responsible for Decent Work (DW) monitoring should be included in decision-making for continuous improvement areas. For PUs that never had any Better Cotton license or certification before, this Indicator will not be audited during their first audit to the Better Cotton Initiative Principles and Criteria. The PUs should use their first certification cycle to identify the key areas and targets, which then will be audited during the recertification audit. Note that for PUs that already have a license or certification, and/or that had one in the past, this Indicator is applicable without exceptions.</p>
1.3.2 (LF)	<p>The intent is for the Producer to develop a strategy for continuous improvement in regenerative agriculture and locally relevant sustainability areas that prioritises field-level activities. Continuous improvement targets should go beyond the P&C v.3.2 and should aim to increase good practices adoption over time.</p>

	<p>Continuous improvement in regenerative agriculture and locally relevant sustainability areas can not only produce environmental benefits but can also help farmers reduce input costs and improve resilience . Soil health is recognised as a key area for resilience in regenerative agriculture and climate change and is strongly encouraged as a focus. Targets identified to improve regenerative agriculture areas can be based on, but not limited to, the following indicators: soil health (e.g., 2.1.1, 2.1.2, 2.1.3, 2.3.3), biodiversity and natural habitats (e.g., 2.3.1, 2.3.2, 2.3.3, 2.4.1), water (e.g., 2.2.1, 2.2.2), pesticides (e.g., criterion 3.1., 3.3), fertilisers (e.g., 2.1.4, 2.1.5), and livestock (e.g., 2.1.5). Annual activities are identified to support the achievement of each four-year target, for example through baseline assessment, research initiative, capacity-strengthening, demo plots and the implementation of locally relevant good practices. The annual activities identified to achieve the four-year targets shall be implemented. The Producer shall measure progress and monitor the effectiveness of these activities, as part of the overall management system in Indicator 1.1.4. The targets and their respective annual activities may be reviewed and adapted, if relevant, with appropriate justification. The targets for continuous improvement can be defined by the Producers themselves, giving flexibility to the most urgent and meaningful issues in their local context. The targets for continuous improvement should consider local sustainability hotspots or priorities, including topics related to gender equality and climate change issues, conditions related to granted exceptional use of Highly Hazardous Pesticides (HHPs), input from workers and/or community stakeholders, corrective actions from past assessments or audits and learnings from self-assessments. Farmers should be able to explain how they identified these focus areas, the specific activities planned and completed and how they are monitoring progress.</p>
<p>3.2.1 (SH, MF, LF)</p>	<p>The intent is for the Producer to have systems in place to ensure farmers use pesticides only when a defined pest threshold is reached, in line with the principles of Integrated Pest Management (IPM) and after prioritising non-chemical methods, as in Indicator 3.1.5. Such thresholds determine the point at which pest damage is likely to cause economic loss and chemical control can be justified. The Economic Threshold Level (ETL) is the preferred reference, as it represents a core IPM concept linking pest population levels to potential economic damage (see Guidance for Criterion 3.1). However, where ETLs are not available or practical to calculate, farmers may rely on other defined pest thresholds such as action thresholds, agronomic thresholds, or Economic Injury Levels (EILs). These shall be developed and validated by credible sources, including agricultural extension services, research institutions, or relevant local authorities. These thresholds provide practical guidance for decision-making while maintaining IPM principles.</p> <p>Under an IPM strategy, farmers should not apply pesticides at the first sign of pests. Cotton, like most crops, can tolerate some degree of pest damage without yields being affected. Therefore, based on monitoring data (Indicator 3.1.4), the farmer should only apply pesticides when pests reach a level high enough that their damage to the crop is greater than the monetary cost of treatment (economic threshold level or other applicable defined pest threshold).</p> <p>Farmers should select and apply pesticides based on guidance and advice on defined pest thresholds, such as economic thresholds, received from a competent technician and/or during training. If pesticides are used, low-toxicity active ingredients shall be prioritised, and pesticides shall be selected and applied in ways that mitigate pest resistance and reduce risks to human health and the environment, for example, through precise application and rotating active ingredients. Toxicity levels of pesticides can be evaluated based on product labels, information from credible extension services or</p>

	<p>research bodies, and Toxic Load Indicator calculations.</p> <p>The application of pesticides on pre-determined dates, without observation, would not meet the intent of this Indicator. In very exceptional circumstances, where an isolated application of pesticides on a pre-determined schedule is based on strong advice from a credible research body, this may be considered acceptable. However, this kind of 'calendar spraying' needs to be documented and justified.</p>
<p>3.3.1 (SH, MF, LF)</p>	<p>The intent is for the Producer to ensure pesticides that are considered as most hazardous to human health or the environment shall not be used on cotton sold under this standard. Pesticides considered prohibited under this Indicator include those in Annex A and B of the Stockholm Convention, Annexes of the Montreal Protocol or Annex III of the Rotterdam Convention. These are all international, multilateral agreements that aim to eliminate or restrict use of the most dangerous pesticides and compounds. Prohibited pesticides also include those defined as 'acute toxic' category 1 or 2 of the EU Globally Harmonized System of Classification and Labelling of Chemicals (GHS) or under 1a and 1b of the WHO classification. Producer Management should make sure that those buying and applying pesticides are aware of the pesticides that are prohibited or targeted for phase-out under the P&C v.3.2. Activities to ensure this can include training on how to read pesticide labels, providing hazardous pesticide lists in local languages, using pictograms on pesticide labels and more. Where prohibited pesticides do not yet have viable alternatives, their exceptional use may be permitted by Better Cotton Initiative through the established exceptional use process. The exceptional use process provides a rigorous and transparent evaluation of requests, including evaluation of viable alternatives, use of mitigation measures and steps taken to reduce or phase out use over time. If exceptional use of pesticides is permitted in specific cases, any agreed conditions shall be strictly followed and reported. Further reference: Better Cotton Initiative Highly Hazardous Pesticides Exceptional Use Procedure Better Cotton Initiative Prohibited Pesticides List</p>
<p>3.5.2 (MF, LF)</p>	<p>The intent is for the Producer to ensure that harm to human health of those using and handling pesticides is minimised through careful and consistent use of appropriate (PPE). The best option to protect humans from pesticide exposure is to avoid pesticides altogether, then to minimise their use and choose fewer toxic options. When there is no alternative to pesticide use, good quality appropriate PPE can help reduce risks to human health, but only if worn and maintained properly. Pesticide exposure can occur via the mouth (oral exposure), skin (dermal) or breathing (inhalation). Using pesticides, in the context of this Indicator, includes all activities conducted during field application (e.g., spraying, seed treatment, granule/powder application, fumigation and others). Handling, in the context of this Indicator, includes all activities related to the storage, preparation, maintenance and disposal of pesticides and their related equipment and material, including activities such as storing, mixing, diluting, measuring, transferring pesticides, preparing, washing and maintaining equipment and materials as well as the disposal of waste and materials. All individuals handling pesticides should have access to appropriate PPE, and it should be used in line with the label instructions of the pesticides in use. Labels should be checked regularly (at least every spray season), and all individuals should receive training on the importance of PPE and proper use and maintenance. PPE should be checked regularly for wear and tear and replaced if required. Where relevant, the Producer Management should consult and collaborate with the Gender Lead or Gender Committee to implement this Indicator.</p>
<p>3.5.7 (SH)</p>	<p>The intent is for the Producer to have systems in place that help maximise the effectiveness of pesticide application and minimise the risks to human health and the environment by using correct equipment and practices. Farmers should monitor weather conditions before spraying, including wind speed and direction, temperature, humidity and</p>

	<p>atmospheric stability. For example, pesticides should not be applied right before rain since this can reduce effectiveness and increase risks of runoff and contamination. The risks of pesticide drift should also be considered. Wind and higher temperatures can increase drift (as evaporation of water-based substances is faster in higher temperatures, leading to smaller droplets that drift more easily). Application equipment is designed to be operated under certain parameters and should be appropriate for the specific pesticides used. The equipment should also be in good condition, with no leaks or worn components. Equipment should be cleaned after each use to reduce the risk of contamination and to keep it in good working order. In the handling of pesticides and application equipment, particular consideration should be given to avoid adverse effects to humans and the environment (for example, mitigating the risk that children can get a hold of the materials, the risk of spills to wells used for drinking water, etc.).</p>
<p>5.1.1 (SH, MF, LF)</p>	<p>The intent is for the Producer to establish and maintain an effective system to proactively identify, monitor and mitigate risks of labour rights violations and remediate when they occur (see Indicator 5.1.3). An effective system is structured, inclusive, and documented, with clear assignment of responsibilities, meaningful involvement of workers, and follow-up to verify the effectiveness of actions taken. By addressing risks before they escalate into actual violations, such systems help safeguard workers' rights and will support the Producer in meeting all requirements under this Principle. Better Cotton Initiative recognises the challenges of ensuring decent work in agriculture, where labour rights violations are often hidden and difficult to detect. This Indicator promotes an 'assess and address' approach, shifting the focus from detecting violations after they occur to anticipating and mitigating risks and remediating incidents in a structured and proactive manner.</p> <p>The Indicator emphasises the importance of:</p> <ol style="list-style-type: none"> 1. Understanding Risks: Engaging with farming communities to understand their workforce's characteristics and identify context-specific labour rights risks. 2. Designing Monitoring Systems: Establishing or strengthening monitoring systems, including community-based approaches where relevant. 3. Mitigating Risks: Implementing practical measures to mitigate risks and improve working conditions. Note that part of risk mitigation might overlap with remediation measures, as covered in 5.1.3. Effective labour monitoring and remediation systems can incorporate: worker profiles, surveys and focus groups with farmers and workers, farm visits and worker interviews during labour-intensive periods of cotton production and consultations with community stakeholders (e.g., schools, local government or women groups). The system should cover labour rights under Principle 5: Decent Work, including the ILO's Fundamental Principles and Rights at Work (freedom of association and collective bargaining, forced labour, child labour, discrimination and safety and health). <p>By fostering community involvement, the monitoring system is better equipped to identify nuanced risks and implement practical, contextually relevant and sustainable solutions. While Producer Management remains accountable for effective implementation of the system, the responsibility to ensure effective oversight and implementation can be assigned to either an individual or a group (e.g., a committee). Whenever formally selected worker representatives are in place, they should be included as members of this committee. The system should account for differing risks for diverse groups of people, especially women and people in vulnerable situations and/or facing exclusion. The individual or committee should regularly consult and cooperate with the Gender Lead or Gender Committee.</p>

<p>5.1.2 (SH, MF)</p>	<p>The intent is for the Producer to ensure that all workers carrying out field-level production work on cotton farms have access to impartial, effective, and secure channels to raise concerns about labour rights violations, and to have those concerns reviewed, responded to, and addressed. A grievance mechanism in this context enables any worker to raise concerns related to their labour rights under this Principle. This includes, but is not limited to, issues such as child labour, forced labour, discrimination, workplace violence and harassment, interference with freedom of association, poor working conditions and health and safety issues, abusive recruitment practices, or any other potential labour rights violations.</p> <p>Workers need a safe and reliable way to voice concerns without fear of retaliation. Impartiality means grievances are raised and considered without bias or undue influence. Effectiveness means that workers can report concerns and ensuring follow-up and remediation. Security means workers can use the mechanism without fear of retaliation, intimidation, or harm, with adequate protections for confidentiality. A channel to raise concerns may be referred to as a grievance mechanism, though the terminology may vary. Producers are not required to create a new channel exclusively for workers if a credible, existing mechanism is already in place. However, they should demonstrate steps are taken to ensure all workers are aware of the mechanisms and can access it without barriers. If existing mechanisms are not fully impartial, effective, secure, or inclusive of all workers, measures should be taken to strengthen or adapt them. Producers should consult workers, including those in vulnerable or marginalised situations, when designing or adapting grievance mechanisms. Mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, and culturally appropriate as per UN guiding principles referenced below. The Gender Lead or Gender Committee should be involved in gender-related grievances to ensure inclusive access and a gender-sensitive resolution process.</p>
<p>5.1.3 (SH, MF)</p>	<p>The intent is for the Producer to establish policies and procedures that ensure any worker affected by labour rights violations has access to appropriate protection and remediation, and that their confidentiality and safety are safeguarded throughout the process. Labour rights violations under this Principle include child labour, forced labour, discrimination, workplace violence and harassment, interference with freedom of association and collective bargaining, substandard working conditions, i.e., poor health and safety practices, and abusive recruitment practices. Protection refers to safeguarding affected workers from further harm, intimidation or retaliation. This includes maintaining confidentiality, taking measures to prevent further harm, and facilitating access to relevant services where available. Remediation refers to correcting the harm caused and taking steps to resolve the issue as far as possible. It includes both corrective actions to address actual cases and preventative measures to reduce the risk of future violations. These actions may include clarifying facts, offering apologies or support, providing compensation, or taking disciplinary action. They may also involve making structural improvements, revising policies, and delivering training. Where appropriate, Producers should engage with workers and their representatives, including trade unions or civil society organisations, where they exist, as part of the remediation process. To ensure that remediation is appropriate, effective, and trusted, Producers should seek input from affected workers. Where possible, workers’ representative bodies, such as trade unions or civil society organisations, should be involved in the design and delivery of remediation. Remediation should be proportionate to the nature of the violation and carried out in a timely manner. “Timely” means without undue delay, taking into account the urgency and severity of the case,</p>

	<p>with immediate action expected where safety is at risk. Where Producers cannot deliver all aspects of remediation directly, they should ensure referral to credible organisations or authorities. Where a violation constitutes a criminal offence, the Producer should respect the complainant’s wishes and, wherever possible, support access to legal remedy, including by facilitating contact with relevant authorities or legal services. The Gender Lead or Gender Committee should be involved in gender-related cases to ensure inclusive access and a gender-sensitive resolution process.</p>
<p>5.1.4 (LF)</p>	<p>The intent is for the Producer to ensure all workers carrying out field-level production work on cotton farms have access to impartial, effective and secure channels to raise concerns about labour rights violations and to have these concerns reviewed, responded to and addressed. This includes protection and remediation in cases where labour rights violations occur. A grievance mechanism in the context of this Indicator should allow all workers to make a complaint on any issue or concern about their labour rights as covered in this Principle, including cases of child labour, forced labour, discrimination, workplace violence and harassment, interference in the freedom to associate, substandard working conditions, abusive recruitment practices and other potential labour rights violations. Impartial channels ensure that workers can raise concerns without bias or undue influence. Effectiveness in this context means that the channel achieves its intended purpose, enabling workers to report violations and have them addressed. Security ensures that workers can use the channel without fear of retaliation, intimidation or harm, with measures in place to protect their confidentiality. This Indicator focuses on grievances raised by Better Cotton Initiative farm workers related to labour rights violations. The grievance mechanism may be in-house, external, or follow a hybrid approach. Regardless of the model used, the design, implementation and review of the mechanism should involve input from workers and, where possible, civil society organisations. This is particularly important where mechanisms are operated internally, to help build trust and support accessibility and effectiveness. Remediation under this Indicator encompasses both corrective and preventive actions. These actions should address the immediate impacts of confirmed violations and reduce the risk of recurrence. They may include strengthening management systems, revising policies and practices, and carrying out targeted interventions to address the root causes of the issue. Where relevant, remediation should be informed by collaboration with stakeholders such as farmers, workers and their representative organisations (e.g. farmer producer organisations and trade unions), programme partners, government actors and other civil society organisations. In some cases, labour rights violations amount to a criminal offence and should be dealt with in accordance with the complainant's wishes and within the framework of local criminal law. If requested and whenever possible, the Producer should support the complainant in accessing legal remedy. The Gender Lead or Gender Committee should be involved for gender-related grievances and to ensure inclusive access to grievance mechanisms and a gender-sensitive resolution process.</p>
<p>5.2.1 (SH, MF, LF)</p>	<p>The intent is for the Producer to have systems in place to ensure that all farmers and workers understand fundamental rights at work. Awareness of these rights is an essential first step towards their protection and respect in practice, which can help prevent violations from occurring. The Producer shall ensure that farmers and workers across worker categories, gender or migrant status receive clear and accessible information on fundamental rights at work. The rights include: The right to freedom of association and collective bargaining; The right to a safe and healthy working environment; Protection from discrimination, child labour, and forced or compulsory labour. Information should be shared through training, awareness-raising, or other communication activities. These should be tailored</p>

to the local context, using appropriate formats, local languages, and delivery methods that take into account varying literacy levels and the timing of recruitment. **The Producer shall periodically review and adapt how information is communicated to ensure that all relevant individuals receive and understand the messages. This includes taking steps to verify understanding, such as training evaluations, follow-up discussions, worker interviews, informal assessments, or feedback from field staff. Where gaps are identified, the Producer should take steps to reinforce key messages and improve understanding. The Producer should collaborate with the Gender Lead or Gender Committee to ensure that both the content and delivery methods are inclusive and gender-sensitive. The Producer should work with local civil society organisations, labour rights groups, or other expert organisations that support farm workers and have experience delivering rights-based training. Such collaborations can help improve trust, relevance, and the overall effectiveness of communication.**