

# BCI Chain of Custody – Self Assessment Guidance

## Title

BCI Chain of Custody – Self Assessment Guidance

## Translation Accuracy

The official language of this document is English. In case of any inconsistency between versions due to translation, please refer to the English version. While translations to other languages may be provided, BCI assumes no liability for errors or misunderstandings due to translation.

## Disclaimer

Following this implementation guidance document does not ensure compliance with the Better Cotton Initiative Chain of Custody Standard.

The Better Cotton Initiative reserves the right to revise guidance based on implementation, learnings and emerging good practice. Please visit <https://bettercotton.org/document-library/> to verify that this document is the most recent version.

## Any Questions or Inputs?

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# About

The Better Cotton Initiative (BCI) Chain of Custody (CoC) Standard Self-Assessment Guidance v1.0 supports organisations following Standard and Certification Bodies with a consistent understanding and application the Self-Assessment requirements within the document.

How to Navigate the document:

- 1) **Requirement Number:** Identifies the specific section within the BCI Chain of Custody Standard.
- 2) **Requirement Detail:** Provides the exact wording of the requirement as stated in the BCI Chain of Custody Standard.
- 3) **Implementation Guidance:** Offers practical advice and/or explanations to help understand and apply the requirement effectively.

## (1) 1.1

**(2)** The supply chain organisation does not need to complete a Self-Assessment prior to their initial certification audit which starts before the 28<sup>th</sup> February 2027.

**(3)** The deadline of the 28<sup>th</sup> February 2027 is to account for those supply chain organisations that have been sourcing and/or selling BCI cotton but have 12 months from the date of this document to complete their self-assessment.

## Introduction

Self-assessments provide an opportunity for supply chain organisations already in the BCI programme to identify opportunities for improvement in how they are adhering to the BCI Chain of Custody Standard. Self Assessments guide suppliers to review their processes against the requirements and to flag any areas requiring improvement.

The Self-Assessment is required for any supply chain organisation adhering to the BCI Chain of Custody Standard, irrespective of whether they are certified or not. The applicability is for any supplier type from Ginner through to Retailers, Brands and Buyers. For multi-sites, every site shall have completed the Self-Assessment annually, and the 'Central Function' (see *BCI Chain of Custody Monitoring and Certification Requirements section 4*) is responsible for ensuring that sites within their 'multi-site' complete the Self-Assessment.

This document provides guidance to impacted stakeholders on their role with regard to the self-assessment.

**Section 1** of this document covers the requirements for supply chain organisations that are already certified against the BCI Chain of Custody Standard.

**Section 2** of this document covers the requirements for Certification Bodies managing their certified supply chain organisations

**Section 3** of this document covers requirements for all supply chain organisations sourcing and/or selling BCI Cotton but have not yet been certified.

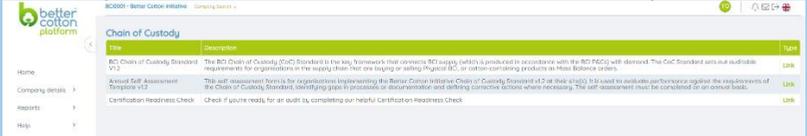
The requirement for Self-Assessments can be found in the BCI Chain of Custody Standard subsection 2.8 (see below):

### 2.8 Self-Assessment

- 2.8.1 The organisation shall conduct an annual self-assessment using a template provided by BCI, covering all activities within the scope of certification, including outsourced activities if applicable.
- 2.8.2 Any non-conformities identified during the self-assessment process shall be addressed and resolved within 90 calendar days of the self-assessment taking place.
- 2.8.3 The results of the self-assessment process shall be shared with the organisation's Certification Body.

*\*Please note this process is not to be confused with guidance and self help tools BCI offers which can be used by suppliers not currently certified to the BCI Chain of Custody Standard to identify compliance gaps before applying for a certification audit.*

# 1. Requirements for Certified Suppliers

<p><b>1.1</b></p> <p>The supply chain organisation does not need to complete a Self-Assessment prior to their initial certification audit which starts before the 28<sup>th</sup> February 2027.</p>	<p>The deadline of the 28<sup>th</sup> February 2027 is to account for those supply chain organisations that have been sourcing and/or selling BCI cotton but have 12 months from the date of this document to complete their self-assessment.</p> <p>For suppliers seeking certification after 31<sup>st</sup> January it is expected they will have completed a self-assessment already.</p>				
<p><b>1.2</b></p> <p>The Self-Assessment shall be completed using the template provided by BCI to ensure consistency in how the process is being followed.</p>	<p>The template can be found in the BCP under the 'Help' section:</p> 				
<p><b>1.3</b></p> <p>The Self-Assessment, shall be completed annually.</p>	<p>A supplier can conduct their self-assessment at any point from 3 months after their initial certification audit up until 12 months from their initial certification audit. It is recommended that the self-assessment is completed no later than 9 months after their initial certification audit date to allow for correction of any non-conformities they identify as part of the self-assessment. The supply chain organisation can choose whether they want to do the full self-assessment in a single day or spread the assessment across different days</p> <table border="1" data-bbox="1144 1265 2024 1369"> <thead> <tr> <th>Initial Certification Date</th> <th>Window for completion of Self-Assessment</th> </tr> </thead> <tbody> <tr> <td>15<sup>th</sup> April 2025</td> <td>15<sup>th</sup> July 2025 – 14<sup>th</sup> April 2026</td> </tr> </tbody> </table>	Initial Certification Date	Window for completion of Self-Assessment	15 <sup>th</sup> April 2025	15 <sup>th</sup> July 2025 – 14 <sup>th</sup> April 2026
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15 <sup>th</sup> April 2025	15 <sup>th</sup> July 2025 – 14 <sup>th</sup> April 2026				

<b>1.4</b>	
<p>If the supply chain organisation fails their initial certification audit they shall use the date of the audit when they subsequently get certified as the anniversary date for future submission of the Self-Assessment template to their Certification Body.</p>	<p>This is here to clarify what the ongoing deadline is for submission for the Self-Assessment.</p> <p>Example – supply chain organisation has an audit on 1<sup>st</sup> May 2026 but fails their audit. They then have another audit on 1<sup>st</sup> September 2026 and achieve certification, the anniversary date will be 1<sup>st</sup> September 2027.</p>
<b>1.5</b>	
<p>The self-assessment should be completed by the management representative (see 2.2.1 of the BCI Chain of Custody Standard) who has overall responsibility and authority for the organisation’s compliance with all applicable requirements of this Standard.</p>	<p>The main focus is that the self-assessment is completed and done so in a timely manner. The management representative may be best placed to complete this due to their role and knowledge of the BCI Chain of Custody Standard. However, it may not always be possible or practical for this person to complete in which case a delegate(s) can be chosen to complete the task as per requirement 1.5.1.</p> <p>The Certification Body would review the details from the previous audit report to confirm this has been completed by the assigned Management Representative.</p>
<b>1.5.1</b>	
<p>The management representative may delegate responsibility for this activity, but the assigned person(s) should be competent in the requirements of the BCI Chain of Custody Standard and be independent from the areas they are assessing.</p>	<p>See guidance above.</p> <p>Example – the person responsible for purchasing should not conduct the self-assessment against section 3 of the BCI Chain of Custody Standard requirements.</p>

<b>1.6</b>	
The self-assessment shall only cover areas within the scope of the certification.	The self-assessment only needs to cover those requirements that are within the BCI Chain of Custody Standard and that are applicable to the respective supply chain organisation.
<b>1.6.1</b>	
Where activities related to the BCI Chain of Custody Standard are outsourced to subcontractor sites, the assessment of such subcontractor sites (as per Section 2.7 of the Standard) may be carried out remotely, provided that all applicable Chain of Custody requirements can be reviewed and evidenced remotely.	The self-assessment needs to include the sub-contractor(s) due to the role they play in the handling of the BCI cotton. However, it may not be practical or necessary to visit those sub-contractors in person so this can be done remotely through calls and/or submission of relevant documents.
<b>1.7</b>	
Where a supply chain organisation identifies any areas where they are not in full compliance with the BCI Chain of Custody Standard requirements they shall raise 'non-conformities' and resolve these within 90 calendar days of completion of the self-assessment.	The self-assessment may flag or identify areas where the supply chain organisation is no longer in compliance. This is to be expected and the main purpose of the self-assessment is to ensure on-going monitoring and continuous improvement against the BCI Chain of Custody Standard.
<b>1.7.1</b>	
Non-conformities raised in the self-assessment will not impact the certification status of the supplier as long as they have been appropriately corrected in the respective timeline.	As is referenced above, the main purpose of the self-assessment is to ensure on-going monitoring and continuous improvement and transparency is crucial in this process. For that reason the intent is not to punish supply chain organisations who identify these areas. For that reason the self-assessment should not impact the certification of the supplier as long as the non-conformities have been adequately addressed.

1.8	
<p>The resolution of the non-conformities identified in the self-assessment shall include actions to resolve the immediate issue.</p>	<p>It is best practise for the supply chain organisations to conduct a root cause analysis to prevent recurrence of the non-conformity.</p>
1.9	
<p>If the supply chain organisation conducts the self-assessment across multiple days, the 90 calendar days for correcting non-conformities will start from when the whole self-assessment is completed.</p>	<p>It is not mandatory, and might not be practical, to complete the self-assessment in one day. If the self-assessment has been conducted over several days, the anniversary date will be the date when the process has been completed e.g. <i>self-assessment conducted 1 – 3 March, the anniversary date would then be the 3 March moving forward.</i></p>
1.10	
<p>For multi-site supply chain organisations having their self-assessment conducted by a Central Function, the 90 calendar days to correct any non-conformities will start from when the final site has been assessed.</p>	<p>The Central Function is the site which is overall responsible for the management of the multi-site entity. Therefore it is the responsibility of the Central Function to ensure all sites are in compliance and have been assessed as part of the self-assessment.</p> <p><i>Example - If the multi-site has 10 sites as part of its scope then the timeline to correct any non-conformities will start when the 10<sup>th</sup> site has been assessed.</i></p> <p>The Central Function may also correct non-conformities as soon as any are identified and does not need to wait for the 10<sup>th</sup> site to be assessed before addressing any non-conformities.</p> <p><i>Example - The Central Function identifies a non-conformity at the 3<sup>rd</sup> site they assess. They may correct this in parallel to conducting assessments or may may review this issue across all sites to ensure it is not a systematic problem before continuing with the self-assessment for other sites.</i></p>

### 1.10.1

Central Functions should consider this in their planning so that they ensure that all sites have been self-assessed before the annual window lapses.

Conducting a self-assessment of multiple sites will take longer than for a single site. Central Functions therefore need to consider this in when planning their self-assessments.

*Example - The multi-site has 5 sites that need to be considered as part of the self-assessment and the Central Function typically allows 1 day per site to complete the self-assessment. The anniversary date for the multi-site to complete their self-assessment and submit to the CB is 31<sup>st</sup> March 2027. The Central Function should therefore consider the 5 days needed to complete the self-assessment plus the 90 days allowed to correct any non-conformities identified. Therefore the latest the Central Function should begin their self-assessment is 26<sup>th</sup> December 2026  
(31<sup>st</sup> March - 90 days = 31<sup>st</sup> December  
31<sup>st</sup> December - 5 days = 26<sup>th</sup> December)*

### 1.10.2

It is acceptable for individual sites to complete their own self-assessments where this is more practical, provided that all sites are reviewed as part of the organisation's overall self-assessment process.

It may be more practical for individual sites in a multi-site to complete the self-assessment directly rather than have the Central Function completing this activity. This is completely acceptable but the Central Function is still responsible for ensuring the self-assessments are completed across all sites.

**1.11**

The supplier shall share their completed self-assessment with their Certification Body within 12 months of their initial certification audit.

Supply chain organisations should share their completed self-assessments with their Certification Bodies as soon as they have them completed in case there are any queries raised by the Certification Body. A completed self-assessment must include correction of any non-conformities so supply chain organisations will need to consider this when planning and completing their self-assessments. Supply chain organisations should also remember that the outcomes of their self-assessment needs to be included as part of their annual management reviews.

## 2. Requirements for Certification Bodies

<p>The main role for a Certification Body with regard to Self-Assessments is to ensure that supply chain organisations they have certified have completed the self-assessment activity and that it has been done within the timelines required by the BCI Chain of Custody Standard.</p>	
<p><b>2.1</b></p>	
<p>The Certification Body and/or auditor shall not assess a supply chain organisation for submission of a Self-Assessment prior to or during their initial certification audit which starts before the 31<sup>st</sup> January 2027.</p>	<p>The Certification Body should check with the supply chain organisation to see if they have completed a self-assessment prior to the audit as the supply chain organisation may have conducted a self-assessment of their own volition.</p>
<p><b>2.2</b></p>	
<p>The Certification Body should retain a log of the deadlines for submission of their respective certified clients' Self-Assessments</p>	<p>Certification Bodies are required to retain details of all of their certified clients however it is recommended that this log also includes details of self-assessment submissions. While the responsibility is with the supply chain organisation to maintain compliance with the BCI Chain of Custody Standard it would still be desirable for a Certification Body to track when self-assessments are due.</p>
<p><b>2.3</b></p>	
<p>The Certification Body shall provide their certified clients with details on how the self-assessment should be submitted (email address, client portal etc).</p>	<p>This requirement is so the certified client knows where to submit their self-assessment and does not receive a non-conformity due to miscommunication. The Certification Body may have a client portal they use to communicate with their clients but an email would also be sufficient if that is the preferred method for the Certification Body.</p>

### 2.3.1

The Certification Body may send reminders to their certified clients to inform them of the need to submit the Self-Assessment prior to the required date of submission.

As with the guidance in 2.2 it would be desirable for Certification Bodies to inform their certified clients of the deadline for submission of their self-assessment as part of the services as a Certification Body. However, the responsibility is with the supply chain organisation to stay in compliance with the Standard.

### 2.4

The Certification Body shall review the submitted Self-Assessment for completeness and to confirm that any non-conformities have been resolved.

It is not expected that the review of the self-assessment is comparable with a full audit and the review of the completeness of the self-assessment should be done remotely and does not need to be done by an approved auditor.

The main thing the Certification Body needs to review for completeness in the Self-Assessment is to ensure that the relevant requirements have been assessed and, if any non-conformities have been identified, they have provide corrections and this was done in the required timelines (90 days of identification).

The Certification Body may request additional documentation to support the correction of any identified non-conformities.

If the review of the Self-Assessment is not included in an existing agreement with the supply chain organisation the Certification Body should reach out to the supply chain organisation to clarify any costs that they may be associated with this process and update their agreement. This may be done in the form of an annex to an existing agreement but would follow the Certification Bodies' existing processes.

<b>2.5</b>	
<p>The Certification Body shall raise a non-conformity if the submitted Self-Assessment;</p> <ul style="list-style-type: none"> <li>• Has not been submitted on time and/or</li> <li>• Has not been fully completed and/or</li> <li>• Has not fully resolved any non-conformities</li> </ul>	<p>The Certification Body shall use the non-conformity table in the BCI Chain of Custody audit report and may just submit this table to the certified client. The non-conformity should be based on the criteria listed in the requirement.</p>
<b>2.5.1</b>	
<p>Where a non-conformity is raised, the Certification Body shall inform the certified client of the non-conformity along with the timelines for closure of the non-conformity (refer to the respective BCI Chain of Custody Monitoring and Certification Requirements).</p>	<p>The Certification Body may communicate with their client in the manner they would usually do e.g. through a client portal or sent via email. The Certification Body needs to include the reason for the non-conformity and the timelines to close the non-conformity which must align with those in the BCI Chain of Custody Monitoring and Certification Requirements.</p>
<b>2.5.1.1</b>	
<p>If the certified supply chain organisation fails to adequately correct the non-conformity in the required timelines they may be suspended (please refer to the respective BCI Chain of Custody Monitoring and Certification Requirements).</p>	<p>Completion of the self-assessment is a mandatory requirement of the BCI Chain of Custody Standard. As per the BCI Chain of Custody Monitoring and Certification Requirements this would result in a minimum suspension of 3 Months or until non-conformities are closed.</p>
<b>2.5.1.2</b>	
<p>The Certification Body may decide a surveillance visit is required if a significant risk is identified in the self-assessment.</p>	<p>A surveillance audit would be considered more by exception and should only be considered if the self-assessment has identified serious issues that may have impacts on the validity of the certificate issued to the supply chain organisation.</p>

<b>2.6</b>	
<p>If the Certification Body confirms that the Self-Assessment is completed they shall upload the Self-Assessment to the certified clients entity on INTACT within 30 days of receipt of the completed Self-Assessment.</p>	<p>INTACT is the platform that BCI uses to communicate with Certification Bodies on audits and assurance activities. Therefore BCI request that self-assessments are added to the INTACT platform. This can be done via the 'Files' tab on the entities profile on INTACT and can be added in the format it was received by the Certification Body.</p>
<b>2.7</b>	
<p>If a supply chain organisation transfers to a new Certification Body the new Certification Body shall be responsible for ensuring that they check the supply chain organisation has submitted a Self-Assessment or for taking actions if the Self Assessment is not submitted</p>	<p>If a supply chain organisation transfers to a new Certification Body mid-certification cycle the new Certification Body needs to ensure that the conditions for certification are met before they take on the client. This includes reaching out to the current Certification Body to agree details of the transfer.</p>
<b>2.7.1.1</b>	
<p>The former Certification Body shall communicate the details of the Self-Assessment for the transferring supply chain organisation to the new Certification Body before the transfer is completed.</p>	<p>This is to ensure that the new Certification Body has all of the required information before a transfer is completed.</p>

### 3. Requirements for Non-Certified Suppliers (Mass Balance only BCP users)

Adherence to the BCI Chain of Custody Standard is mandatory for any supply chain organisation seeking to source or trade BCI cotton. This includes those supply chain organisations that have BCP accounts but have not yet chosen to get certified. The next set of requirements applies to these supply chain organisations.

#### 3.1

All supply chain organisations (even if they have not been through the certification process) in the BCI Chain of Custody Programme shall complete an annual Self-Assessment against the BCI Chain of Custody Standard

A 'complete' Self-Assessment includes all relevant requirements being completed and any non-conformities being addressed within 90 calendar days of completion of the Self-Assessment.

#### 3.2

The Self-Assessment shall be completed using the template provided by BCI to ensure consistency in how the process is being followed.

The template can be found in the BCP under the 'Help' section:



#### 3.3

The Self-Assessment, shall be completed annually.

A supplier can conduct their self-assessment at any point. It is recommended that the self-assessment is completed no later than 9 months after date of this document to allow for correction of any non-conformities they identify as part of the self-assessment. The supply chain organisation can choose whether they want to do the full self-assessment in a single day or spread the assessment across different days

<b>3.3.1</b>	
Supply chain organisations sourcing and/or selling BCI Cotton but have not yet been certified shall complete their Self-Assessment (including corrective actions) within 12 months of the publication of this document.	
<b>3.3.1.1</b>	
The date of completion of the Self Assessment shall then act as the anniversary date for future completions	<i>Example - If the supply chain organisation completes the self-assessment on the 1<sup>st</sup> June 2026, the anniversary date for the completion of the next self-assessment will be 1<sup>st</sup> June 2027.</i>
<b>3.3.2</b>	
Supply chain organisations joining the BCI Chain of Custody programme after the publication of this document shall complete their self-assessment within 12 months of being granted access to the Better Cotton Platform (BCP).	
<b>3.4</b>	
The self-assessment should be completed by the management representative (see 2.2.1 of the BCI Chain of Custody Standard) who has overall responsibility and authority for the organisation's compliance with all applicable requirements of this Standard	The main focus is that the self-assessment is completed and done so in a timely manner. The management representative may be best placed to complete this due to their role and knowledge of the BCI Chain of Custody Standard. However, it may not always be possible or practical for this person to complete in which case a delegate(s) can be chosen to complete the task.

<b>3.4.1</b>	
The management representative may delegate responsibility for this activity, but the assigned person(s) should be competent in the requirements of the BCI Chain of Custody Standard and be independent from the areas they are assessing.	See guidance above.  <i>Example – the person responsible for purchasing should not conduct the self-assessment against section 3 of the BCI Chain of Custody Standard requirements.</i>
<b>3.5</b>	
The self-assessment shall only cover areas within the scope of the Chain of Custody Standard.	The self-assessment only needs to cover those requirements that are within the BCI Chain of Custody Standard and that are applicable to the respective supply chain organisation.
<b>3.5.1</b>	
Where activities related to the BCI Chain of Custody Standard are outsourced to subcontractor sites, the assessment of such subcontractor sites (as per Section 2.7 of the Standard) may be carried out remotely, provided that all applicable Chain of Custody requirements can be reviewed and evidenced remotely.	The self-assessment needs to include the sub-contractor(s) due to the role they play in the handling of the BCI cotton. However, it may not be practical or necessary to visit those sub-contractors in person so this can be done remotely through calls and/or submission of relevant documents.
<b>3.6</b>	
Where a supply chain organisation identifies any areas where they are not in full compliance with the BCI Chain of Custody Standard requirements they shall record ‘non-conformities’ and resolve these within 90 calendar days of completion of the self-assessment.	The self-assessment may flag or identify areas where the supply chain organisation is no longer in compliance. This is to be expected and the main purpose of the self-assessment is to ensure on-going monitoring and continuous improvement against the BCI Chain of Custody Standard.

<b>3.6.1</b>	
Non-conformities raised in the self-assessment will not impact the BCP access of the supply chain organisation as long as they have been corrected in the respective timeline.	As is referenced above, the main purpose of the self-assessment is to ensure on-going monitoring and continuous improvement and transparency is crucial in this process. For that reason the intent is not to punish supply chain organisations who identify these areas. For that reason the self-assessment should not impact the certification of the supplier as long as the non-conformities have been adequately addressed.
<b>3.7</b>	
The resolution of the non-conformities identified in the self-assessment shall include actions to resolve the immediate issue	It is best practise for the supply chain organisations to conduct a root cause analysis to prevent recurrence of the non-conformity.
<b>3.8</b>	
If the supply chain organisation conducts the self-assessment across multiple days, the 90 calendar days for correcting non-conformities will start from when the whole self-assessment is completed.	It is not mandatory, and might not be practical, to complete the self-assessment in one day. If the self-assessment has been conducted over several days, the anniversary date will be the date when the process has been completed e.g. self-assessment conducted 1 – 3 March, the anniversary date would then be the 3 March moving forward.
<b>3.9</b>	
BCI retains the right to request this information and may request points of clarification or conduct further monitoring as a consequence of the information provided.	The requirement in the BCI Chain of Custody Standard refers to submission of the Self-Assessment to a Certification. For non-certified supply chain organisations this is not relevant however, BCI still expect non-certified supply chain organisations to adhere to the BCI Chain of Custody Standard. Therefore BCI may request to see the completed self-assessment to verify compliance with the requirements.

### 3.9.1

Supply chain organisation failing to submit the self-assessment within 7 days of request shall have their BCP account blocked until it has been received and reviewed as completed by BCI.

### 3.9.2

Supply Chain organisations that submit an incomplete self-assessment shall have 7 working days to submit a completed Self-Assessment upon notification by BCI.

#### 3.9.2.1

If a completed self-assessment is not submitted in this timeframe the supply chain organisation shall have their BCP account blocked until it has been received and reviewed as completed by BCI