

# PROCEDURE FOR DEVELOPING LOCAL INTERPRETATION OF BCI GLOBAL STANDARDS

MAY 2016

## 1. Purpose and scope of the procedure

- 1.1 The draft procedure ('the procedure') outlined in this document offers a framework through which to develop a formal interpretation of the BCI Principles and Criteria ('standard') for application at the local level. It is **voluntary in nature** and should be utilised only as and when stakeholders and the local situation deem it necessary and/or desirable.
- 1.2 While this procedure has been developed by taking into account the varying legal frameworks in which it will be applied and best practice knowledge on the topic, **it does not constitute a legal position or legal advice**. If there are any doubts or concerns regarding the legality of the application of the procedure in a particular jurisdiction or context, appropriate legal opinion should be sought.
- 1.3 BCI works in a sector with a wide diversity in terms of the modes of production, the national context, the farm types, cotton characteristics and supply chain dynamics. This variety needs to be attended to through the Better Cotton system and in order to assure users that the cotton produced is done so under equivalent conditions and is achieving meaningful, lasting and continuous improvement on the ground.
- 1.4 The procedure does not involve the creation of any new standard but rather acts as a **supplement and complement to the existing standard and standard system**. It must not be used as a means to try and raise or lower the level of performance required and nor should it be seen as a way of introducing changes otherwise not incorporated in the global standard revision. It is intended to be compatible with the structure and function of the BCI standard system, building on the roles, responsibilities and expertise already at work and avoiding placing any undue additional burdens on stakeholders.
- 1.5 The procedure has been prepared as an **alternative mode through which to foster greater local applicability**, in addition to existing mechanisms - specifically the BCI Partnering Tool for benchmarking existing local cotton production standards. The structure and considerations of effectiveness and credibility, while different, should broadly reflect those of this other document.
- 1.6 As is currently the case, the **BCI standard can continue to be applied directly**, without the use of a formal interpretation. Participation in and fulfilling the requirements of the BCI standard system, whether utilising a local interpretation or not should be held in the same standing, no matter where this takes place. The development of a local interpretation of the BCI standard should not suggest any higher level of performance or credibility of the cotton production in any particular jurisdiction.

- 1.7 The scope of the procedure and therefore the areas to which a local interpretation document can refer are limited to the contents of the principles and criteria (the standard) and do not extend to cover the requirements of the BCI assurance system. While any interpretation of the global standard will have some implications for how compliance is assessed, this should not result in changes to the mode of assessment or the level of assurance demanded.
- 1.8 This procedure or any local interpretation document are **not intended to supplant applicable local, national or international rules or regulations** governing the production or trade in cotton. Any actions, either procedural or practical, should be undertaken in a manner that respects relevant local legislation.
- 1.9 **Developing a local interpretation brings with it a number of costs** – in time, resources and expertise – and these need to be accounted for prior to embarking on these activities. While the costs should not resemble those of a full standard development process, funding needs to be sought that will cover the costs of staff time, meetings and events, and travel, as well as any external fees or expenses. Funding should be sought ahead of time, with consideration given to the source of these and the importance of the process remaining credible and impartial. Exact amounts will depend on the proposed scope of the interpretation and the size of the country but they should be sufficient to ensure adequate rigour, while employing resources effectively and efficiently.

## 2. Definitions

- 2.1 **Local applicability:** It means the criteria with which farmers are being asked to comply make sense for the social, ecological and economic context in which that production takes place. This means taking into account local laws and regulation, cultural attitudes and practices, language, market structure and relations, as well as good scientific understanding of sustainable use and impact on natural resources. If a standard is fully applicable at the local level it a) does not impose criteria that are irrelevant to the context of production (thereby creating unnecessary demands or costs b) all the pressing issues affecting cotton production in a place are covered by the standard system. There are various approaches through which a system can incorporate greater local applicability (e.g. interpretation, benchmarking, mutual recognition, local standard development)
- 2.2 **Local buy-in:** The extent to which a sustainability standard system fosters support from local stakeholders. Good engagement and integration of local stakeholders can help improve the applicability of a standard by reference to their expert local knowledge and a locally applicable standard is more likely to be supported by key stakeholders from government, industry, civil society and research institutions. Developing local buy-in helps create the enabling environment for embedding at a national level, a specific global aim of BCI.
- 2.3 **Local interpretation:** The process of adapting the more generalised principles and criteria of a global sustainability standard to specific local or national contexts. It involves maintaining the primacy of the global version while adding greater detail, filtering out less relevant requirements and adding further locally relevant considerations where needed. Local interpretation is one strategy among several through which standard system can increase its local applicability.
- 2.4 **Local interpretation document:** The main text output of a **local interpretation process**, providing details of the interpreted standard and the production criteria and indicators applicable to a particular country or region. It should be considered in conjunction with other BCI documents, including the global standard.

[NB The interpretation 'process' follows the 'procedure' set out here in this guide]

### 3. References

- 3.1 Better Cotton Production Principles and Criteria
- 3.2 Better Cotton Assurance program document
- 3.3 Better Cotton Start Up Process Strategy document
- 3.4 Better Cotton Benchmarking Procedure
- 3.5 ISEAL Code of Good Practice for Setting Social and Environmental Standards (v. 6.0)
- 3.6 ISEAL Credibility Principles
- 3.7 ISEAL Guidance on standard-setting as a strategy for improving the local relevance of sustainability standards
- 3.8 ISO/IEC Guide 59

### 4. Decision to develop a local interpretation

- 4.1 The decision of whether a local interpretation document should be developed needs to come from and have the support of local stakeholders. The decision needs to take into account whether such an initiative is the best one for the country in question, whether it represents a credible approach, whether it would represent value for money and whether it would be logistically feasible and appropriate.
- 4.2 The potential need for a local interpretation in the first instance will be informed by input from three main sources:
  - Consistent feedback, concerns or issues raised by local stakeholders at or between revisions of the global standard
  - Impressions and input from BCI staff
  - Input and analysis derived from a BCI Start Up process

The role of monitoring and assessing the status of a country and its potential readiness for local interpretation should be undertaken by those BCI staff and/or partners with direct responsibility for local activities and strategy. The questions listed in 4.8 offer examples of the kinds of questions that would inform this initial assessment. The exact timeframe and modalities for beginning those discussions will depend on the context in question but the revision of the global standard may be a useful point in time.

- 4.3 If these internal BCI discussions affirm the notion that a local interpretation could be a valuable approach with which to move forward, the idea should be tested **during an 'inception meeting' with local stakeholders**. This meeting will consist of a one-off meeting of key stakeholders, invited by the Country Manager (or Strategic Partner). This should establish whether there is a clear need for local interpretation (among other options for increasing local applicability), the possible scope of the process and the interpretation document, how the document would be developed and the areas it should cover. Ideally this inception meeting would be held alongside the revision of the global standard but could also be in conjunction with other events. If it is conducted alongside that of the global standard revision, this would signify the starting point of the local interpretation but would also need to take into account that the global standard revision would not have yet been completed. This should be considered during both events and framed to ensure minimal confusion among participants.
- 4.4 Different countries will find themselves in different positions, depending on the mode through which BCI has been introduced there. These would include:
  - i. BCI has become established without a Start Up Process (i.e. engagement predated the availability of the Start Up Process policy)

- ii. The country has already gone through a Start Up Process
- iii. The country is going to embark on a Start Up Process

4.5 Where BCI is already established in a country without having conducted a Start Up Process, there will be increased importance placed on the inception meeting and the feedback from internal and external stakeholders. Where there is a country strategy in place or strategy at the global level, this should feed into the decision as well. Ultimately in this case, the decision of whether local interpretation is needed will be an iterative one and will be helped by including as much expertise as possible, including the Country Manager or Strategic Partner, the Program and Partnerships Managers, the Standards and Assurance team and other relevant Directors.

4.6 Where a country has already gone through a Start Up Process, many of the questions relevant to assessing its readiness for local interpretation will have already been to some degree asked and answered. The decision of whether to begin the process (both internally and with external stakeholders) should be based heavily on the outputs of the Start Up Process, including the new country policy, stakeholder workshops and gap analysis conducted. If, upon assessment, the country is seen to be ready and appropriate for local interpretation, an inception meeting is still necessary for local stakeholders to agree on the need for such an approach as this possibility would not have been available at the time of the Start Up Process. If it is decided to develop a local interpretation, any policies or strategies for the country implicated by the development should be amended to reflect the planned work.

4.7 If a new country is embarking on a Start Up Process, the possibility of developing a local interpretation should be considered and embedded at the outset of the process. This will involve incorporating its potential into BCI's strategy for the country and also explaining the process to stakeholders early on. It will also mean that any local interpretation will be in part an extension of the activities involved in the Start Up Process. The most effective way to broach the question of local interpretation will be in the broader context of ensuring local applicability, the various mechanisms that can be used to achieve this and which one(s) are most appropriate to the country in question.

4.8 Below is an illustrative list of key questions that can help inform the decision of whether local interpretation is appropriate and necessary. These may be relevant to discussions both on an internal level at BCI and at the inception meeting<sup>1</sup>:

- Is local production of Better Cotton sufficiently established? Is there market demand?
- Are there concerted calls from local stakeholders for greater applicability? Is there sufficient local buy-in to support the development and implementation?
- Does the local cotton production sector represent a new or different context for Better Cotton? What is the capacity of the Country Manager, local office or set of local stakeholders?
- Is the country a strategic global priority for BCI?
- Has a Better Cotton Start Up process been initiated in the country? How would a local interpretation align or be integrated into this?
- Are there key issues affecting local production or trade insufficiently addressed or currently absent from the provisions of the BCI global standard? Given the local context,

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<sup>1</sup> If the intention is to use these questions within a formalised decision-making matrix, they will need further refinement, structuring and weighting. In the first instance, given the actual number of countries in question and that this is a question of strategy rather than compliance, it makes sense to consider this formal structure once a local interpretation has been piloted.

are there any significant areas of the global standard that are not applicable, redundant or which generate incoherence and confusion?

- Does cotton production represent a politically or economically significant sector to the national economy? Does local cotton production represent a significant and influential proportion of total global cotton production or total Better Cotton production?
- Is there sufficient funding available to develop and disseminate the local interpretation document(s)? Are there stakeholders willing to provide funds? Will the document need to be revised and updated?
- Is a formal local interpretation process the most appropriate for the country and context? Could the same result be achieved through other more efficient means (e.g. benchmarking local standards, capacity building, outreach)?
- Are there varying conditions within the country i.e. regionally? Are there sufficient existing mechanisms in place to deal with this variation?  
Is a previous season assurance review available? Does this highlight clear instances of incoherent criteria, misunderstanding or farmer dissatisfaction?

4.9 Following the inception meeting to establish the need for local interpretation, the potential modalities of its development need to be discussed internally between the BCI Country Manager (or Strategic Partner), having led the local meeting discussion, and other members of the BCI Secretariat. **A decision to develop a local interpretation must have the clear support of local stakeholders.** These discussions should cover questions of funding, how to ensure the credibility and consistency of the process and resulting interpretation document, and suggested roles and responsibilities. Based on the preceding discussions and input, the decision of whether a local interpretation is to be developed in a given country should be taken by the BCI Leadership Team. Following this decision, a statement of intent and development proposal, should be drawn up by the BCI Country Manager and with the support of others in the BCI secretariat. These are then sent to the BCI Council informing it of the decision to begin a process of local interpretation and providing them the opportunity to comment and raise concerns. The BCI Council provides the final ratification of the outcome of the local interpretation process, rather than permission to commence work.

## 5. Process Outline

5.1 Having established the need and desire for a local interpretation process, its feasibility and with permission to commence work, the BCI Country Manager (or other appropriate personnel) should publish a notice, shared with local stakeholders of the intent to develop a local interpretation, including:

- Explanation of 'local interpretation' (definition);
- Explanation of how it may affect stakeholders (outcomes, impacts, potential changes);
- Outline of the (intended) process;
- Call for expressions of interest for participation on a 7-10 person, non-permanent steering committee, consisting of local, appointed stakeholders (including explanation of what this will involve);
- Call for initial feedback and the opportunity to raise major objections (explaining that there will also be further opportunity to comment)

5.2 A steering committee should be formed from those put forward. The committee is not required to be strictly representative but a balance of stakeholders, expertise and experience is preferred. This balance will depend on the country in question and the availability, ability and willingness of stakeholders to participate. However, the onus for the selection of stakeholders should be on their knowledge of cotton production locally, their knowledge of the BCI standard

system, that their participation would not jeopardise the credibility of the process, their willingness to engage on a technical and impartial basis and their relative status and influence locally. Throughout the committee selection and enrolment, it should be remembered that it is intended to oversee the *interpretation* of the global standard and not its alteration. It may be the case that proactive efforts are needed to reach out to potential committee members in order to assemble an effective body. A selection should be proposed by the BCI Country Manager (or Strategic Partner or PPM where applicable), discussed by the BCI Secretariat and approved by the Director of Standards and Assurance. A standardised terms of reference<sup>2</sup> should be signed by committee members committing them to an impartial, open and consensus-based process, and defining their role and status within it. Although this should be a non-permanent body, the committee should function as a recognised entity for the duration of the interpretation document's development and it should oversee its completion.

- 5.3 In large countries, especially those with regional differences in the cotton sector, particular attention should be paid to the composition of the steering committee in order to reflect this range of practice and performance. A larger committee, a structure involving subcommittees or additional regional meetings may be required to adequately address these differences in the process and its outputs. However, the aim should not be to define and recognise multiple tiers of performance or to divide up otherwise contiguous jurisdictions as this may serve to undermine the aim of greater applicability and continuous improvement in the BCI system.
- 5.4 Soon after the formation of the committee, a '**committee launch meeting**' should be held to discuss roles and responsibilities, the development process (who undertakes the work, the level and form of consultation), the intended scope of the interpretation document, and areas of particular concern or risk. The result of this meeting should be a detailed plan of work to be shared with the BCI Secretariat. The committee is expected to provide input into budgetary decisions but should not be tasked with controlling such decisions – such a responsibility should remain within BCI. On some occasions, the committee may be involved with activities or discussions aimed at securing funding from other organisations but again it should not have budgetary control.
- 5.5 The development of a working draft of the local interpretation document (ready for consultation) can be undertaken in a range of ways and should depend on the particular local dynamics and concerns. The draft should rely on previous discussions and input from stakeholders. In electing how the draft should be developed, attention should be paid to stakeholder knowledge of the BCI system and standard, stakeholder knowledge of standards and the credibility implications of who is involved. Four possible options could include:
- By members of the steering committee
  - Through the formation of working groups on particular topics
  - By a suitably qualified external consultant
  - With input via focus groups or targeted interviews
- 5.6 While a local interpretation document is not a separate standard to the BCI global standard, and therefore does not require the same level, depth and rigour of consultation in its development, the process should build on the principles, considerations and best practices contained in guidance such as the ISEAL Standard Setting Code, the ISEAL Credibility Principles (see section below), ISO/IEC Guide 59 and BCI's own standard-setting procedure and related policies.

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<sup>2</sup> A standardised template terms of reference document should be developed by BCI for use with non-permanent steering committees to streamline the process and establish the expectations of committee members. It should be adapted to each specific process where needed.

- 5.7 The draft interpretation document should be put out for at least one month of consultation, including at least one stakeholder workshop, along with appropriate means for stakeholders to comment. If the process or the country context (e.g. size, language, farm types, production practices) warrant it, further meetings or phases of consultation may be deemed necessary. Decisions on the degree of consultation should be made considering the credibility of the process and outputs, the efficiency and effectiveness of measures put in place, and with the overall aim of continuous improvement. Stakeholders wishing to comment or participate should have the opportunity to do so, have sufficient time to, and consideration should be made for the inclusion of vulnerable or disadvantaged groups (including translation into local languages).
- 5.8 The timeframe for developing a local interpretation will depend on the local demands and situations. However, it is recommended that the first time a local interpretation is produced for a country, it is undertaken as a standalone process (after the global BCI standard is revised) and subsequent review or revision of the local interpretation be done in conjunction with later revisions of the global BCI standard. This will mean that public events can be co-hosted, making for a more efficient use of time and resources. It will be important to clearly explain the parallel processes to participants in order to avoid confusion.
- 5.9 The final version of a local interpretation document should take into account comments received and be shared with the BCI Standards and Assurance team by the local steering committee. The BCI S&A team should review the final draft with particular consideration of consistency with the intent of the global standard and with the overall credibility of the system (including the implications for the BCI assurance process). If there are recommendations or suggestions, these should be incorporated and the final document submitted to the BCI Council for approval. This submission should include a report on the development process, how comments received were addressed and the next steps for implementation (timeframes, verification implications, training) and the plan for monitoring and evaluating the success of the process and outputs.
- 5.10 Based on the documents submitted, the BCI Council is tasked with approving the final version of the local interpretation document. This should be based on the coherence of the process – from justification of the need, the mode of stakeholder engagement, the quality of the final document, the plan for implementation and review, and the overall alignment of the document and process to the aims and policies of BCI. It should pay particular attention to a) the envisaged impact and potential for continuous improved provided b) the credibility and rigour of the process c) the efficiency and value for money of the process and d) any challenges or areas of risk to be highlighted.
- 5.11 Upon approval by BCI, the local interpretation document should be promptly made available to local stakeholders, as well as other BCI members.
- 5.12 Once approved, the proposed plan for implementation should be into place, including updating relevant documents for the purpose of assurance and verification to bring them in line with the now finalised local interpretation document. This should be led by the Standards and Assurance team, with the support of local staff. It will also be necessary to update and conduct training with BCI staff, stakeholders and/or farmers in order to inform them of the outcome of the process and the changes affecting them. This should be organised through the staff and partners usually responsible for local capacity building efforts. Finally, a review should be conducted at a timely moment after the finalisation and implementation of the local interpretation in order to evaluate the success and impact of the process and document and to check that document is generating the improvements intended. This may be conducted by several different entities but should be coordinated via the BCI Monitoring and Evaluation country team.

## 6. Possible scope of a local interpretation document

6.1 In order to maintain the consistency of the Better Cotton system, it is important to make clear the areas of the BCI global standard that can be adapted and how. As mentioned above, the global standard remains reference point for any local interpretation document and aspects of it should only be adapted as to preserve the intent of the original version.

	Minimum	Improvement
<b>Criteria</b>	As default, should not be amended. Can be amended if there is clear and demonstrable non-applicability of a criterion. Amended criteria should be accompanied by justification for changes, referring to the original criterion intent. Can be accompanied by additional text. Additional criteria can be added (legal requirements; or already prevalent/routine practices; or improvement criteria)	Can be amended – additional text or examples can be provided; criteria can be ranked or prioritised; additional criteria can be added; criteria can be removed if can be demonstrated as non-applicable
<b>Indicators</b>	Can be completely or partially changed. Amendments should be explained. Additional detail e.g. list of acceptable/good practices can be provided.	Can be completely or partially changed. Amendments should be explained. Additional detail e.g. list of acceptable/good practices can be provided.

- **Minimum criteria** form the core part of the BCI standard and define part of the minimum thresholds for participating in the BCI system. Generally speaking, they should not be altered, nor any removed, however, if it can be clearly demonstrated that a criterion, as written, is not applicable to the whole of the country or area in question, an amendment can be made, based on the intent of the original standard. Detailed explanation of the change and justification should be made in supporting documents and these undergo particular scrutiny by reviewers in the BCI Standards and Assurance team. Minimum criteria can also be accompanied by additional, clarifying information on their application in the country in question. If there are improvement requirements which could reasonably be expected to qualify as minimum performance requirements in the country in question (either because they are legally mandatory or already prevalent or routine practices), they can be upgraded to minimum requirements. This should not be construed as a way to artificially raise the level of the standard and only applies where a requirement is already an established local practice.
- **Improvement criteria** form the basis for assessing the continuous improvement of a farm towards up the BCI performance scale – which criteria and when they are taken up depends to a large degree on the farm in question and the context of production. Firstly, a local interpretation document can help localise some of these requirements by offering more information on the examples of activities, practices or programmes that would qualify to meet certain requirements. Secondly, an interpretation document can help to rank or prioritise the improvement requirements as they pertain to the country or locality in question, thereby providing a clearer pathway for farmers to improve practices. Thirdly, additional, locally specific improvement requirements can be added to a local interpretation document.
- **Compliance indicators** offer one of the most relevant areas through which to interpret the BCI standard as they pertain directly to how the standard is being applied and assessed on the ground. Using the global indicators as a starting point, these can be refined and provided in more detail through a local interpretation document. It may also be that conditions within



country differ and this internal variation needs to be accounted for in the development of the local interpretation. It is important to include the expertise and input of independent verifiers in the development of these and to ensure adapted criteria are 'verifiable'. The indicators for both minimum production criteria and improvement criteria can be adapted.

- **Local laws and regulation** can be included for reference alongside the BCI Principles and Criteria in a local interpretation document. The aim of this would be to present clearly the range of actions required from BCI farmers – both in terms of mandatory regulatory compliance and voluntary standards compliance. This gives the opportunity to show the complementarity of BCI with local legislation. Furthermore, if regulatory requirements include practices considered improvement requirements under the BCI standard, they can be moved up and presented as minimum requirements.

**NB Regarding the consideration of applicable local laws and regulation:**

Better Cotton practices and production should respect and comply with local law and it is within the remit of the state to make, monitor and enforce its laws. However, while it recognises the role of government in regulating the cotton sector, the BCI system has evolved in part to deal with gaps in regulatory frameworks and enforcement regimes. Therefore, even where Better Cotton requirements are covered by local laws, as default those requirements should still be covered by the same verification and assurance as any other location. This helps guard against any failings of local legal monitoring and enforcement and assures international stakeholders of the consistency through which Better Cotton principles and criteria are being applied and assessed.

## 7 Responsibilities

- 7.1 The development of the interpretation document should be led in the first instance by the local **BCI country manager** or country office. It should be their responsibility to manage the overall process, including considerations of logistics, governance and communication. The country manager acts as the focal point for connecting local stakeholders to the international secretariat and takes the initiative for suggesting or recommending the readiness for local interpretation in a particular geography. The country manager is likely to be the budget holder for any funding of the process and generally accountable to the Director of Standards and Assurance for the purpose of the local interpretation.
- 7.2 Where there is not a BCI country manager in place, there may be an equivalent role for a local **Strategic Partner** to play in the development of the local interpretation. While there is nothing that should inherently prevent this, the range of capacity, knowledge and attitude of Strategic Partners should guide the decision of whether it is an appropriate approach to take. If a Strategic Partner is tasked with leading a local interpretation, there will be a greater role for the relevant **Partnership and Program Manager** to oversee this process and engage directly where necessary.
- 7.3 A **non-permanent steering committee**, consisting of representatives from major local stakeholder groups (7-10 people) should be formed during the inception phase (along with their terms of reference) for overseeing the development of the local interpretation. Its fundamental role is to set the aims for the local interpretation, decide how and who will draft the document, review and edit its contents, and ultimately assume the responsibility of issuing the document, as well as acting as its advocates to their constituents. As per 5.4 above, the responsibility for drafting the document will depend on the context and agreed modalities of the process. The BCI Country Manager (or equivalent BCI staff or partner) is expected to occupy one of seats on the steering committee. The steering committee itself should not have any budgetary responsibility.

- 7.4 The **BCI Secretariat** is responsible for launching a local interpretation development process (upon the recommendation of a country manager), ensuring the local interpretation remains within the parameters and aims of the overall BCI standard system and maintains the consistency and credibility of the global standard. It should also monitor the progress of the local interpretation development, offer support or input where required and provide review and recommendations regarding the final document (this should be undertaken by the Standards and Assurance team).
- 7.5 The **BCI Council** is ultimately responsible for approving finalised local interpretation documents. The Council should provide oversight and act as an added mechanism for ensuring the overall credibility and effectiveness of the process and its outputs.

## 8 Credibility and Oversight

With reference to the ISEAL Credibility Principles, the principles most implicated in a process for developing a local interpretation document are as follows:

- 8.1 Relevance** - does the local interpretation render the international standard more relevant to the local context? Does it exclude any redundant or arbitrary criteria? Does it cover all major areas of concern locally? Is it based on current and local expertise and understanding?
- 8.2 Engagement** – has the process sufficiently engaged stakeholders? Have vulnerable or disadvantaged groups been adequately included? Have comments been sufficiently addressed? Are there unresolved issues? Has the process taken into account stakeholder access to technology and literacy, as well as provided materials in local languages?
- 8.3 Efficiency** – has the process made good use of resources? Have measures been taken to avoid stakeholder fatigue and duplication? Do the outputs and processes represent good value for money? Has the process made use of other events and meetings?
- 8.4 Improvement** – does the local interpretation document set out clearer and more meaningful ways for farmers to move along the BCI performance scale and introduce better cotton production practices? Do the outputs and processes align with BCI's broader aims and values? Does the document offer a coherent approach for implementing and assessing progress towards Better Cotton.

## Annex: Compiled Timeframe for Development Process

The table below offers an illustrative outline of the timeframe for the development process of a local interpretation document. This represents the likely minimum amount of time for undertaking the activities. In many cases, the actual process will take longer and the potential for this should be understood and incorporated in the planning and management of the development. An area likely to add time will be in forming the committee and in reaching out to stakeholders. The quality of the process should not be compromised for the sake of an ideal timeframe.

Phase	Activity	Responsible	Outputs	Timeframe
<b>Pre-development (9 weeks)</b>	Inception meeting	BCI Country Manager	Meeting report on need for local interpretation	Week 0
	Internal discussion on parameters for local interpretation	BCI Country Manager & rest of BCI Secretariat	Formal request to begin process of local interpretation, including proposal	Week 4
	Publishing of notification of intent to develop local interpretation	BCI Country Manager	Published note (including call for committee members)	Week 6
	Assembly of 7-10 person local steering committee	BCI Secretariat	Signed ToRs	Week 9
<b>Development (5 weeks)</b>	Committee Launch Meeting	Local steering committee	Plan outlined for development process and shared	Week 11
	Development of draft interpretation document	Assigned persons & local steering committee	Draft interpretation document	Week 15
<b>Consultation (6 weeks)</b>	Consultation period (minimum one month), means to comment provided	Local steering committee	Consolidated responses received	Week 19
	Stakeholder meeting (minimum x1)	Local steering committee	Meeting report	Week 19
<b>Finalisation (6 weeks)</b>	Incorporation of comments and preparation of final draft	Assigned persons	Final draft of interpretation document; separate document explaining how comments were addressed	Week 21
	Submission of final draft document to BCI Secretariat	Steering committee	Final draft; comment document; report on development process; proposal for next steps/implementation	Week 23
	Review of final draft documents and suggestions made	BCI Standards & Assurance team	Reviewed documents	Week 24
	Submission to BCI Council for approval	BCI Council	Finalised documents	Week 25
	Publishing of final local interpretation document, shared with stakeholders	BCI Country Manager, Local steering committee	Published local interpretation document	Week 27



<b>Implementation</b>	Update assurance documents	BCI Country Manager, Standards & Assurance team	Updated assurance documents	
	Update training procedures based on local interpretation document	BCI Country Manager	Updated training procedures	
	Implement M&E exercise on local interpretation	BCI Monitoring & Evaluation team	Report of progress and impact of local interpretation document and process	