

# BCI Principles & Criteria: 2015-17 Revision

## Questions & Answers

### Transition Phase & Transition Indicators

#### ➤ What is the transition phase?

The full revised Standard will become effective for all Producers (existing and new) from 1 March 2018; the majority of core indicators and all improvement indicators will be effective from this date. This effectively means 2018-19 season for the both hemispheres.

Some selected core indicators (hereby referred to as “transition indicators”) are expected to require longer implementation timeframes, and will have an effective date of 1 March 2019 (2019-20 season).

These indicators relate to:

- Issues posing technical or competency challenges for farmers to implement;
- Issues requiring longer timeframe to plan their implementation, with respect to the timing of seasonal activities;
- Issues requiring longer timeframe for partners’ capacity to be built, with appropriate guidance and training material developed by BCI.

This means that all Producers will be assessed against the full new P&C in the 2018/19 season; however for “transition indicators”, only observations (not non-conformities) can be raised during the 2018-19 season if Producers do not conform. Alongside these transition indicators, equivalent core indicators from version 1 will also be assessed where these exist (see the list in column J of the matrix) and non-conformities may be raised against them for the 2018-19 season.

From 1 March 2019, all producers will be assessed against all of the core and improvement indicators and non-conformities can be raised against all indicators from this point forward.

#### ➤ How do I identify transition indicators?

In the Principles, Criteria & Indicators [Matrix](#), transition indicators are highlighted in yellow. In the additional column on the right (column J) you will find, for each transition indicator, the indicator against which Producers will be assessed until 1 March 2019.

- **What will be the structure of the performance scale? Will assurance documents be modified to monitor new requirements (especially transition indicators) in 2018?**

As a result of the revision process, generic Principles and Criteria and Performance scale documents have been merged into one stand-alone document: the BCI Principles and Criteria.

Assurance documents (assurance program document, self-assessment template, external verification procedures) have been/are being reviewed and updated in the light of changes brought to the revised standard in terms of terminology, requirement formulation and sampling methodology.

Regarding the monitoring of transition indicators implementation, for the season 2018-2019, producers will not be verified against Transition Indicators but will only receive observations as noted above. Templates, procedures and documents will be developed and made available for 2PCCs and 3PVs. 2PCCs and 3PVs will be trained on how to deliver observations for the TIs. IPs will be trained on how to support farmers in monitoring the phasing in of TIs.

## Natural Substance Use

- **What do country teams need to do for the registry of natural substances?**

The Guidance to this Improvement indicator states that: "Over 2018, BCI country teams will appoint a national stakeholder council/group in each of the BCI countries to identify existing national substances used in areas of production. A process will be designed to review and validate substances as well as publishing a list. Conditions of use for each substance will be enclosed. This new approach will support BCI in becoming even more relevant to the local context.' It is up to Country Managers to determine the best way of identifying existing natural substances used in cotton production which may be through appointing a national stakeholder council/group as stated in the Guidance but alternative mechanisms can be used to create the list.

- **If no farmers are using natural substances in the country, does a group still have to be set up?**

If there is no use of natural substances at national level, there is no need to set up a natural substance registry working group. Country Managers can decide the best way to confirm this non-use, for example through reviewing Result indicators records from previous years.

➤ **Do food ingredients (e.g. pepper) also need to be registered?**

Although natural substances used can play a critical and locally-appropriate role in sustainable cotton production, it needs to be recognised that some can also have negative impact on biodiversity or human health, if not used correctly.

In the BCI standard, natural substances for the purpose of crop protection correspond to nonchemical treatment, and can be associated with biopesticides, which are certain types of pesticides derived from natural material such as animals, plants, bacteria and certain minerals, and can be either “homemade” or commercially produced. The use of neem oil is one example of naturally occurring pesticides commonly used on cotton. Natural substances can also be used to attract or maintain populations of beneficial insects, natural enemies (predators or parasites) of pests.

All of these substances need to be registered even if they are only composed of a single food ingredient.

## **Pesticides Restriction: Rotterdam, GHS & WHO**

➤ **How are Perfluorinated chemicals (PFC) being addressed?**

PFC are listed under The Stockholm Convention as Persistent Organic Pollutant (POP), which means that signatory countries are required to restrict its production. Annex A and B of the Stockholm Convention have always been banned by BCI.

➤ **How often will the list of banned pesticides be revised?**

Annexure II of the Principles & Criteria will include the following:

- A list of substances listed in the Stockholm and Rotterdam conventions as of 17 May 2004 and 24 February 2004 respectively;
- A list of substances listed in WHO class 1a/1b;
- A list of substances listed in GHS categories 1 and 2.

BCI will update those lists on a yearly basis, so Producers and Implementing Partners can refer to it regularly.

➤ **In some countries the list is owned by governments or national institutions. What should be done in that case?**

In practice this will still mean BCI farmers have to comply with the list of banned pesticides and those marked for phasing out, so there is no change to the impact on the ground in these cases.

- **Shall we consider national list as predominant over the international convention list?**

BCI requires the use of pesticides that are nationally registered which may mean that some pesticides which are not listed under the various conventions above will also be banned because they do not appear on the national register.

- **How well do alternatives work vis a vis phased out materials?**

At the moment the focus is on providing details of alternatives to reduce the toxicity of the chemicals applied. These will need to be applied in line with the IPM Principles as part of an integrated strategy to ensure their effectiveness – the application of alternative pesticides should never be seen as the only solution. Some of the research being funded by the USAID grant will be looking into alternatives to highly toxic pesticides and aims to provide details of alternative active ingredients that can be used, together with a brief review of their effectiveness. Similar work is also being undertaken by the ISEAL IPM Coalition Partners representing a number of agricultural sustainability standards.

- **What can be done if no alternatives are available? Will local context at the country level be taken into account?**

As noted above, research will be conducted as part of various projects and training modules on cross-crop alternatives to PICs, WHO1a/1b, and pesticides meeting the criteria of carcinogenicity, mutagenicity and reproductive toxicity. The results of this research and the modules will be made available by BCI secretariat over the course of 2018. Of course, Country teams may support partners in developing partnerships and projects on alternatives with local public authorities, research institutes or NGOs working on the topic before then.

- **Should the TLI (Toxic Load Indicator) be used for alternatives? Isn't that the purpose of the TLI?**

Ideally, alternatives to highly toxic pesticides will be primarily non-chemical. However, where chemical pesticides are still used as alternatives it will be important to use the Toxic Load Indicator to quantify the toxicity that results from the use of these alternatives. This evaluation will help in targeting where reduction, replacement or removal efforts need to be put in the IPM strategy.

- **In countries like India where people are paid to apply pesticide on a daily rate, what can be done?**

This is a complex issue that goes beyond the simple issue of standards and that will not be solved by a 'quick fix' solution. This underlines the importance of effective training on IPM

techniques and the targeted and safe use of pesticides where producers choose to apply them. By encouraging the adoption of these improved practices, the incentive for applying pesticides should be reduced as producers see an increase in profitability from using alternative IPM methods.

## Full & Minimum Personal Protective Equipment

- **Do farmers need to use ready-made PPEs or can they use improvised PPEs (e.g.: sunglasses, motor-bike helmets, full-sleeve clothes, cloth)?**

There is the need to differentiate full PPE and Minimum PPE. Full Personal Protective Equipment (PPE) refers to the conditions of applications of pesticides to avoid and/or mitigate dermal absorption, ingestion and inhalation as detailed on the chemical label. For smallholders, full PPE can often be unaffordable, hardly available for purchase or unsuitable for use in hot climates. To address this issue, the concept of “minimum PPE” for smallholders as a core indicator has been introduced. Full PPE remains an improvement indicator for smallholders and becomes core for Medium and Large Farms.

However, it was agreed that it would be too prescriptive to require specific garments and equipment in the definition of Minimum PPE, since this may not be affordable, appropriate or available for all farmers. Therefore, a more broadly applicable definition for Minimum PPE that focuses on the body parts to be covered during spraying was developed. It is then up to PU managers to support farmers in defining the most appropriate specific equipment to be used.

## Water Stewardship Plan

- **When are the outcomes of the Pilot Projects expected? It would be interesting to receive the results (especially for rainfed countries) before planning the transition.**

First of all it is important to recognize that the Council has validated the whole standard and that only a minor portion of it will be pilot-tested. This means we cannot delay the implementation process just for those aspects of the standard that are being tested in this way. It may seem a bit strange to finalize a standard before it's tested but this is normally what all voluntary standards do because most of the time, you need the formal consultations to be completed before launching a costly pilot project.

Over the 2018-19 season we will be testing the new Water Stewardship and Land Use change approaches. Training material will be communicated early in the season but results from the implementation of the new criteria should be collected after Self-assessment that will help to inform future guidance and training materials.

➤ **Do we have a clear definition of “mapping”? Translation into other languages (e.g.: Chinese) might cause issues without a clear definition.**

First, it is important to highlight that the Producer should first of all make sure that mapping of the resource they are targeting does not already exist in some form. Local authorities may indeed provide support in locating water abstraction points on maps close to the production area.

Although regular water surveys by trained hydrologists on and around the farm using remote sensing or other sophisticated technology would constitute a best practice, in reality the minimum expectation for smallholders is the production of rough sketches of Learning Group (or village) farm areas, created in a participatory manner with LG members.

The mapping and understanding of water resources includes the following components:

- i. Identification of the river catchment(s) where the farm is located
- ii. Identification of water sources for cotton irrigation and mapping location(s) in the catchment(s) and/or aquifers from which water is sourced (applicable to irrigation farms only)
- iii. Identification of water availability and water quality issues:
  - a) at the farm location (if available)
  - b) in the catchment(s) where the farm is located
  - c) in the catchment(s) and/or aquifers from which water for irrigation is sourced (applicable to irrigation farms and to farms that source water for irrigation from a different river basin/catchment to the farm location)
- iv. Exploration of the potential of rainwater harvesting during the rainy season that could be used during the dry season to decrease pressure on scarce surface and groundwater resources
- v. Mapping of wetlands (swamps, ponds and lakes, either permanent or seasonal) and riparian vegetation areas in the farm and along its borders

➤ **How can we define opportunities for collaboration and collective action?**

There is no strict definition of the opportunities for collaboration and collective action. However, the main aspects of this critical component of water management can be identified as per below:

1. Producers have an understanding of the competing use of water by other water uses and users in the same river catchment(s) and/or aquifers:
2. Producers include the following in their Water Stewardship plan:
  - Documentation of the local water issues with regard to water quantity and water quality
  - Identification of local initiatives related to water and involved organisations and institutions
  - Participation with other water users, government and civil society in catchment or aquifer water planning and management

- Participation in public-private partnerships, or established water initiatives aimed at reducing water scarcity and improving water quality

It should be noted that The Council decided to set the applicability date of this component within three to five years, to allow for the dissemination of lessons learned through the water pilots. The secretariat set the effective date, in line with Council's recommendation, at 1 March 2022.

## Soil Testing

### ➤ How will sampling be conducted for PUs?

For Smallholders, soil testing must be conducted on a minimum of 20% of Learning Groups (LGs) within a Producer Unit (PU) each year, testing different LGs each year. This way, all LGs will be covered over a period of 5 years.

This means that if there are 100 LGs in a PU, there will be a minimum of 20 samples (1 per LG) in a given year. The 20% represents a compliant arbitrary threshold but this can be increased where feasible if there is a need to measure or monitor soil macro-nutrients content on soil to inform decisions on fertilizer use and/or to give the Producer the ability to monitor progress in managing soil fertility levels.

These analyses can be done through basic soil test kits that are affordable and easy to use or through laboratory sampling. However, for Smallholders and Medium Farms, local partnerships should be established at PU or Project level with a competent body that can provide guidance and financial/technical capacity on soil testing and results interpretation.

### ➤ For soil testing at SH level, will all plots need to be tested in a given LG?

No, in a given LG the decision of which plot needs to be tested when has to be taken collectively by LG members based on local circumstances. It is an agronomic-level decision that cannot be taken anywhere else.

### ➤ How will sampling be conducted for LFs?

Regarding Large Farms, all will have to go through soil testing at least once every 5 years. Besides, it is assumed that soil testing is a regular and well-defined practice and that it is not for BCI to define sampling. It is up to the Producer to do that as long as testing is conducted at least once in every 5 year period.

- **Taking into account environments where no soil fertilizers are applied, how applicable will this criterion be?**

The primary objective of soil testing is to measure macro-nutrients in order to evaluate soil health for learning purposes. It corresponds to the overall new approach of understanding the state of resources in the farm and beyond. It means that even for countries where there is no fertilizer application, there is a benefit in understanding the condition of the soil in terms of NPK and pH (soil acidity / alkalinity).

- **In indicator 3.1.6, is testing for organic matter required?**

This improvement indicator focuses on promoting good soil structure by protecting organic matter, and maintaining a sufficient amount of soil micro-organisms. From the perspective of continuous improvement, producers are encouraged to assess and monitor organic matter. There are well-known “basic” methods to do so, such as the loss on ignition method that is mentioned in the guidance. Measuring and monitoring organic matter is also useful for the purpose of soil fertility enhancement.

- **What about soil type identification for smallholders? Why isn't it required? Is soil mapping still relevant without soil type identification?**

It was agreed that it is already quite demanding to require soil testing for the purpose of assessing macro-nutrients needs. It would be unrealistic to require soil type identification for smallholders as a core requirement.

- **Were any soil experts involved in the formulation of these soil criteria?**

A soil management expert from Solidaridad has indeed made a critical review from the principle and developed the narrative.

- **How will information collected through soil testing be used to manage soil fertility? How will learning in this regard be facilitated?**

Soil testing will allow Producers to assess needs in terms of the quantity and timing of fertiliser applications. The timing of when nutrients need to be available can be predicted, planned and tracked. The amounts of fertilizer to be used are a combination of several factors: expected yield, soil health, farmer's experience and cost benefits. Results obtained through testing should lead to decision-making by farmers, and it is the role of the IP to train farmers and help them use these results to manage soil fertility in the most effective way.



## Biodiversity and Land Use Change

### ➤ Is there a clear definition of what we mean by “biodiversity”?

This is defined in the Guidance: ‘Biodiversity refers to the variety or range of life in a particular habitat. On-farm biodiversity is what constitutes the agricultural ecosystems (agro-ecosystem): the variety and variability of animals, plants and micro-organisms, at the genetic, species and ecosystem levels, which are necessary to sustain key functions of the agro-ecosystem, its structure and processes. Biodiversity can be of utilitarian, aesthetic, recreational, intrinsic or ethical value to people, and is also linked to ecosystem resilience. Biodiversity values may include patches of natural vegetation, water bodies, seasonal streams, riparian buffers, important plant and animal species (especially any nationally protected species and any known cases of biocontrol for cotton pests).’

### ➤ Is there a clear definition of what constitutes biodiversity “resources”?

Resources include:

- Water and soil resources
- Protected areas (such as a wetland, a patch of natural vegetation)
- Animal, vegetal and microbial species

### ➤ Do we have a clear definition of “mapping” in the context of biodiversity management?

Mapping includes the identification of biodiversity values within the area covered by Learning Group farmers (for smallholders) and the individual farms (for medium and large farms.) As noted above these values may include patches of natural vegetation, water bodies, seasonal streams, riparian buffers, important plant and animal species (especially any nationally protected species and any known cases of biocontrol for cotton pests). For LG farmers, at a minimum, a rough sketch needs to be prepared with input from all Learning Group members through participatory mapping (map-making process that attempts to make visible the association between land and farmers/local communities by using cartography and resources inventory tools).

For medium and large farmers, the farmers are expected to include consultation with outside experts (e.g. Ministry of Environment, conservation NGOs...) and biodiversity mapping is to be carried out (through mapping tool or GIS technology), in order to produce maps to be used for management.

➤ **Is there a clear definition of what we mean by “degraded areas”?**

Degraded areas are areas affected by:

- Overgrazing;
- Erosion: especially near roads and streams or areas of natural vegetation (e.g. patches or corridors);
- Waterlogging

that require restoration with extra planting of native species or protection from overharvesting.

## Child Labour Policy

➤ **Does the child labour policy have to be communicated to workers only, or also to farmers?**

The Child Labour Policy needs to be communicated to both workers and farmers, because it is important that farmers have a clear understanding of the Policy requirements and the implications for their own families and workers.

## Gender Equality

➤ **How strict is BCI about payment of minimum wages to workers by farmers? In the case where both male and women workers are paid lower than minimum wages, there is no discrimination on wages. What should be done then?**

Criterion 6.13 addresses minimum wages by requiring that workers are paid wages at least equivalent to the applicable legal national minimum wage or regional norm, whichever is higher and that they are paid regularly, on time and through an appropriate method of payment.

The core indicator requirement for all three farmer categories is that Producers are aware of the minimum wage and the improvement indicator requirement for all three categories is that workers are in fact paid equal or higher than the minimum wage.

Then, indicator 6.5 requires that the equal wage is paid to workers who perform, the same job irrespective of gender as a core indicator for medium and large farms. In this specific case, it is then required for employers to reinforce their commitment by moving towards paying the minimum wage to all workers.



## Continuous Improvement Plan

- **What does the reference “tying to the CIP” for each management plan imply concretely?**

This will become clearer with the creation of the CI template currently being worked on by S&A and Supply. In essence, the idea is that each management plan would refer to the relevant part of the CIP and vice versa so that the two plans are integrated in their content and approach.