

# BCI 2015-17 Standard's Review

## Synopsis of the new Standard's Key Changes

### Overview

The six principles and associated criteria were first published in 2010. In line with codes of good practices for voluntary standards, BCI periodically reviews its standard in order to keep up with innovative agricultural practices and latest scientific and technological research. Revisions of the standard also take into account lessons learned from implementation and evaluation of the earlier versions of the standard.

In 2015, BCI engaged in such a formal standard revision process. After two rounds of global public consultations (in February 2016 and January 2017), numerous outreach activities, and several reviews by the BCI Standard Review Committee, a draft was submitted to the Council in May 2017.

During 6 months, the Council reviewed the document and finally agreed on a revised version of the BCI standard in November 2017 with the aim of officially launching it on 1<sup>st</sup> March 2018. As the result of these 2,5 years of review, some substantive changes have been brought to the standard.

This document offers an overview of the key changes made in BCI's Principles and Criteria (version 2.0).

### Timeline

- **2015**  
Beginning of the formal standard revision process.
  
- **May – November 2017**  
A first draft was presented to the BCI Council in May 2017. After meeting on four consecutive times, the Council approved a final draft in November 2017. The BCI Secretariat, as per the initial plan, proposed to launch the revised Principles & Criteria v2.0 on 1 March 2018.
  
- **November 2017 – March 2018**  
Standard rollout preparation phase.

➤ **From 1 March 2018**

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.

➤ **From 1 March 2018 to 1 March 2019: Transition period**

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).

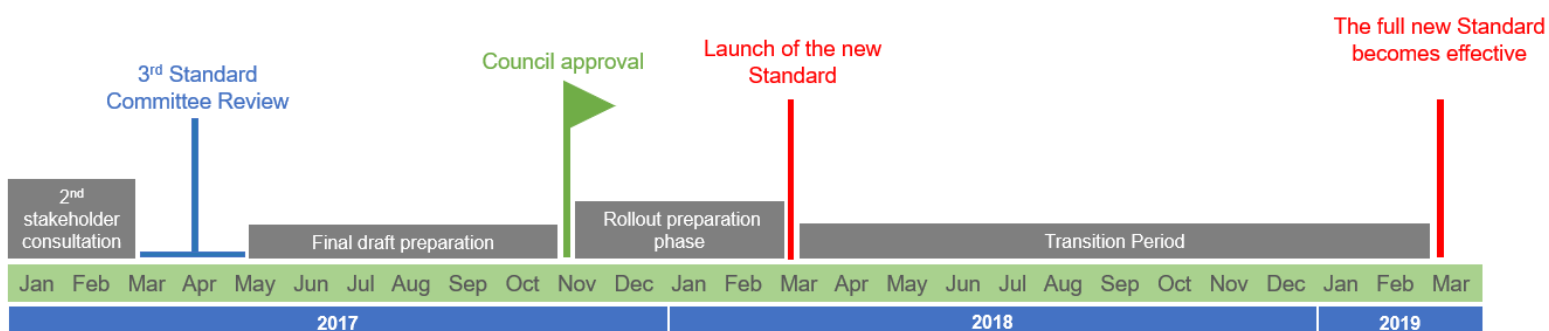
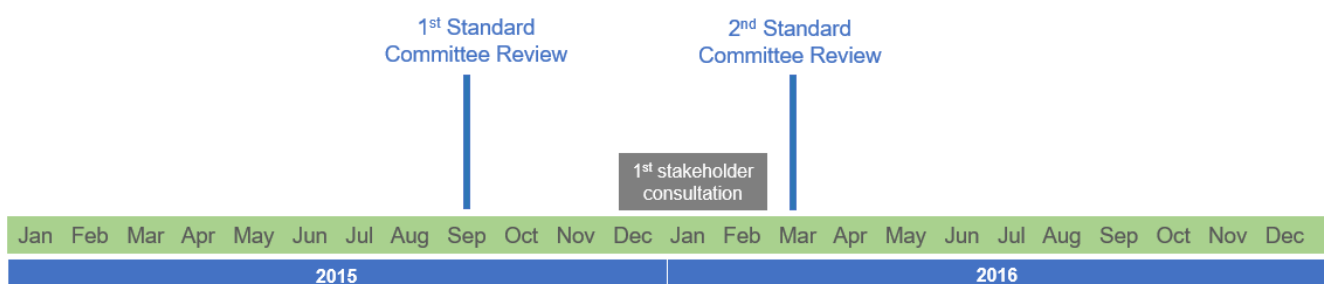
These indicators relate to:

- 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 Producer does not conform.

➤ **From 1 March 2019**

All producers will be assessed against all core and improvement indicators.



## Introducing BCI's revised Principles and Criteria key changes

### MANAGEMENT PLANNING APPROACH

A new management planning approach has been developed for three environmental principles: water, soil and biodiversity. BCI aims to prescribe each component of the plans which need to be addressed, and requires Producers to define the content of these plans, associated timelines and monitoring measures. Furthermore, BCI will guide Producers on how to best relate or integrate each individual management plan into a consolidated Continuous Improvement Plan (covered under the new Principle 7: Farm Management).

#### **Original Proposition**

Principle 2 (water stewardship), 3 (soil health), and 4 (biodiversity enhancement) require the design and implementation of a management plan. Each of the principles embeds only one criterion followed by indicators, breaking down the plan steps by farmer categories.

#### **Stakeholder Consultation Results**

There was broad support for the management planning approach for the three environmental principles. However, some key stakeholders made the point that:

- Not enough explanation was provided on the nature of the plans and the condition/cost of implementation;
- It should be explained why no management plan is required for the other principles (e.g. fibre quality, Decent Work).

#### **Recommendations from the Standard Committee**

The management planning approach should be maintained through the final draft. However, more explanation and guidance would need to be provided on the link between the Continuous Improvement Plan and the environmental management plans required under P2, P3 and P4. The Management Planning approach has already existed on P1 (crop protection) and has been limited to the other environmental principles because of the holistic dimension of their scope.

#### **Council's decision**

The Council approved the Committee's recommendations.

## EMPHASISING THE IMPORTANCE OF CLIMATE CHANGE

Climate Change is tackled more explicitly as a crosscutting issue in each relevant criteria. Furthermore, an annex to the Principles & Criteria has been developed to detail how BCI addresses climate change mitigation and adaptation.

### **Original Proposition**

Climate mitigation and adaptation aspects are scattered in the Crop Protection, Water, Soil and Biodiversity principles intent sections. Furthermore, a dedicated annex explains how climate mitigation and adaptation aspects are addressed throughout the new draft.

### **Stakeholder Consultation Results**

Stakeholders approved the suggested crosscutting approach to climate issues scattered throughout the 4 environmental principles. However, many stakeholders (including prominent Retailers & Brands) wanted to further flag and clarify which criteria are addressing climate change and considered the Climate annex to be insufficient to flag the prominence of Climate Change as an issue of critical importance.

### **Recommendations from the Standard Committee**

The concerns raised by the stakeholders had already been addressed to a large extent in the first draft, through the inclusion of climate explanation in each criteria's intent sections. Considering this, the Committee recommended to maintain the proposed options, to review and strengthen the annex, and to furthermore ensure that adaptation and mitigation objectives are also clearly outlined in the introduction section under each relevant principle.

### **Council's decision**

The Council accepted that climate change was already addressed extensively as a cross-cutting issue through the current Principles & Criteria. It approved the Committee's recommendation to address climate change through an annex and, where relevant, in other intent sections of the Principles & Criteria.

## PESTICIDE RESTRICTION – ROTTERDAM (PIC) CONVENTION

In line with BCI's aim to reinforce its approach towards the elimination of Highly Hazardous Pesticides, it was agreed to ban the use of pesticides listed in the Rotterdam Convention (PICs), but only from 1<sup>st</sup> March 2019, after adequate guidance on alternatives has been made available.

It was also agreed to ban chemicals listed under the Montreal Protocol as a matter of principle in order to bring BCI in line with other like-minded standards, even though this will have no real effect since no Montreal Protocol chemicals are currently used by any cotton farmers.

This change implies the ban of critical Highly Hazardous Pesticides such as Monocrotophos, Paramion or Phosphamidon. BCI plans to conduct research and develop a guidance document and training module on alternatives to these active ingredients to support farmers being compliant by 2019.

### Original proposition

Banning the use by BCI farmers of pesticides listed under the Montreal protocol and the Rotterdam convention (as it is already the case for the Stockholm convention).

### Stakeholder Consultation Results

An overwhelming majority of stakeholders supported a stricter approach with the ban of the three conventions' listed active ingredients. However some warned that phasing out processes are difficult to implement while active ingredients are still approved as per national legislation (for example, Monocrotophos).

### Recommendations from the Standard Committee

It was agreed to add Rotterdam and Montreal protocol to the list of banned active ingredients.

Note on Monocrotophos: The only significant impact would be the ban of Monocrotophos, which is still widely used across India. It was noted, however, that Monocrotophos has been targeted for elimination in several BCI projects with promising results, that chemical alternatives are available, and that BCI plans to conduct research and develop guidance and training module on alternatives to Monocrotophos with support from USAID funds.

Any other concerned active ingredients still in use by farmers participating in the BCSS as of 2015 are used by a very marginal number of farmers (typically less than 5% in any particular country). BCI is also working with the IPM Coalition and through an ISEAL Innovation grant to develop a Pesticide Database which will make it easier for standards users to identify clear and up-to-date lists of banned or restricted active ingredients. The database will be expended to include guidance on alternatives in 2018.

### Council's decision

The Council recognised that BCI was going in the right direction but that the 2018 target might be too ambitious. It thus suggested setting an applicability date of 2019, after adequate guidance on alternatives has been made available.

## PESTICIDE RESTRICTION – PHASING OUT EXTREMELY AND HIGHLY HAZARDOUS ACTIVE INGREDIENTS

New phasing-out deadlines were adopted for extremely or highly hazardous active ingredients for mammal acute toxicity (2021 and 2024 respectively). The BCI Secretariat will conduct research and develop training modules on alternatives to WHO 1a/1b pesticides.

### Original proposition

Set phasing out deadlines for highly or extremely hazardous active ingredients:

- 2023 for rarely used, extremely toxic WHO 1a chemicals;
- 2020 for WHO 1b chemicals.

### Stakeholder Consultation Results

A majority were in favour of setting deadlines for phasing out processes, due to the unacceptable health risks, the need to bring BCI's ambition in line with its stakeholders' expectations and with other like-minded standards, and because many believed most of these products would eventually become obsolete.

However, a small number of stakeholders warned that phasing out processes were difficult to

implement while banned pesticides were still approved as per national legislation. Some insisted on the absence of alternatives.

### Recommendations from the Standard Committee

These deadlines were considered sufficient time to allow producers, partners, and other stakeholders to address any phasing out challenges. The main chemicals concerned in "BCSS countries" are:

- Triazophos (1b, often used in IN and PK);
- Dichlorvos and Methomyl (1b, rarely used in IN and PK);
- Omethoate and Oxydemeton Methyl (1b, very rarely used in IN);
- Phorate (1a, very rarely used in IN and USA).

BCI will focus research and build guidance on alternatives to these chemicals.

### Note from the BCI Secretariat

Phorate has been reported to be widely used in Australia as an alternative to neonicotinoids and to manage resistance. It was claimed however that worker exposure to Phorate has been eliminated through the application of a granular form applied at planting using a completely closed handling system on modified machinery. The Secretariat recommends that through the equivalence partnership discussions and associated benchmarking exercises following the release of BCI's new Principles & Criteria, the issue of workers exposure and the particular Australian case be considered in relation to the intent of BC's WHO class criteria (i.e. worker's exposure specifically).

### Council's decision

The Council decided to adopt the new phasing-out deadlines for extremely or highly hazardous active ingredients for mammal acute toxicity, however applying the deadlines of 2021 for 1b chemicals and 2024 for 1a chemicals.

## PESTICIDE RESTRICTION – PHASING OUT OF CARCINOGEN, MUTAGEN AND REPRODUCTIVE TOXICANT PESTICIDES

A criteria related to the phase-out of active ingredients that are known or presumed to be human carcinogen, mutagen and reproductive toxicant (with reference to relevant categories of GHS, and WHO) has been added. However, no fixed timeline has been set for phasing out these ingredients.

### **Original proposition**

Add a criteria related to the phase-out of active ingredients that are known or presumed to be human carcinogenic, mutagen and reproductive toxicant (with reference to relevant categories of GHS, IARC and WHO), however setting no fixed timeline.

### **Stakeholder Consultation Results**

Several Stakeholders, in particular from Australia, alerted to the fact that this criterion would lead to a “mass exit” of “almost every Australian producer” because Glyphosate, the most widely used herbicide in cotton, is listed as an IARC group 2A and stakeholders have stated that there is limited evidence of carcinogenicity in humans.

### **Recommendations from the Standard Committee**

Although the proposed criteria did not specify any fixed timeline, meaning that the phasing out would only be expected when appropriate alternatives are identified, the Committee, based on feedback from Australian Stakeholders, and on the fact that the use Glyphosate in particular is widespread across many counties (AU, BR, IS, SA), agreed to remove presumed/suspected carcinogens from the criteria.

### **Note from the BCI Secretariat**

The Secretariat maintained the proposal, but removed IARC classification as a parameter.

### **Council’s decision**

The Council approved the Committee’s and Secretariat’s recommendations, which are in line with the Highly Hazardous Pesticides approach of FAO.

## PESTICIDE RESTRICTION – NATURAL SUBSTANCE USE

With the goal of strengthening control over home-made pesticides, all natural substances used for the purpose of controlling pest will have to be registered under a local/national BCI natural substance registry.

This approach will enable BCI reinforce its general approach towards pest control, while ensuring that requirements are flexible and adapted to the local context.

### Original proposition

All natural substances used for the purpose of controlling pests should be registered in the OISAT (Online Information Services for Non-chemical Pest Management) database to allow their use in BCI farms.

### Stakeholder Consultation Results

A majority of stakeholders supported the proposal. However, other respondents highlighted the fact that in many countries, and especially in the context of Smallholders, ‘homemade’ substances that are not in the OISAT database are often used, and farmers should not be penalised in these cases. Stakeholders also raised the point that suppliers of OISAT-listed substances may be difficult to find. Furthermore, the database is only available in English, which may be an issue in some countries. In other places, referring to OISAT would not be relevant as most of the natural substances used at country-level are already registered by the government (e.g. in the US).

### Recommendations from the Standard Committee

The Committee acknowledged the fact that requiring all natural substances to be registered with OISAT would not be a satisfactory option, due to the concerns raised by stakeholders. Instead, the Committee decided that a National Stakeholder Council (or alternatively a group composed of Implementing Partners) will be formed (or revived, or their scope expanded in case they are still operating) to review and validate natural substances that may be used in areas of production. Once the designated group or council is formed, the process, under the overall supervision of the relevant BCI country manager, will include three steps:

1. Identify existing non-chemical treatment and home-made substances used in cotton production at national/regional level;
2. Review and validate the level of risks and effectiveness for each of the identified substances;
3. Develop a list of “registered natural substances” and prescribe relevant and appropriate Health & Safety measures with clear conditions of use based on existing scientific or grey literature and BCI National Guidance Material.

OISAT will not be the only reference list but instead will be one valuable source of information to help validate substances on the BCI natural substance registry.

In light of this, the Committee recommended including the following indicator as core for the 3 farmer categories: *“1.2.3. All natural substances used for the purpose of controlling pest are registered under the local/national BCI natural substance registry.”*



**Council's decision**

Some council members raised questions on feasibility of the recommendation's implementation (availability of data's, variation of non-chemical treatments, local context and use). It was added that implementing the measure in "indirect" countries might be challenging. Another concern related to the presence a national stakeholder bodies in countries. For all these reasons, it was decided that this concept should take the form of an improvement indicator as opposed to core.

## PESTICIDE RESTRICTION – FULL & MINIMUM PERSONAL PROTECTIVE EQUIPMENT (PPE)

PPE already being an improvement requirement, BCI sought to introduce the concept of Minimum PPE in order to at least have some core requirement related to PPE.

Minimum PPE has thus been introduced as a core indicator for Smallholders. Full PPE as per the product label will be required as a core indicator for Medium and Large Farms, and included as an improvement for Smallholders. Implementing Partners are expected to work towards putting measures in place towards achieving conformity with the improvement.

### Original proposition

Introduce the concept of “Minimum PPE” as a core indicator for Smallholders, based on a definition that focuses on prescribed garments/accessories.

### Stakeholder Consultation Results

Although a majority of stakeholders supported the proposed definition of Minimum PPE, some

raised the following concerns:

- Will this concept be clearly understood and applied?
- Is the difference between “minimum” and “full” PPE clear enough?
- Is it really necessary to introduce a new concept of Minimum PPE, since label instructions already represent the minimum acceptable threshold of protection?
- The list of needed materials should include face and eyes protection (e.g. eye goggles and mouth masks);
- Local attire (instead of the prescribed trousers/pants and long sleeves) may be more appropriate in some areas;
- BCI’s Implementing Partners should facilitate access to full PPE for the most vulnerable farmers, through access to financial and/or technical support.

### Recommendations from the Standard Committee

The Committee confirmed its support for the following:

- Require Full PPE as per the product label as a core indicator for Medium and Large Farms, and as an improvement indicator for Smallholders. Implementing Partners are expected to work towards putting measures in place towards achieving conformity with the improvement indicator;
- Develop a more broadly applicable definition for Minimum PPE which focuses on body parts to be covered during spraying. It would then be up to PU managers to support farmers in defining the most appropriate specific equipment to be used;
- Introduce the concept of Minimum PPE as a core indicator for Smallholders.

### Council’s decision

The Council decided to integrate the Committee’s recommendation on Minimum PPE as a core indicator for Smallholders, with a definition based on body parts. The definition on full PPE as core for Medium and Large Farms and improvement for Smallholders was also accepted. The transition period will last 18 months starting from 1<sup>st</sup> March 2018.

## WATER STEWARDSHIP PLAN – COLLECTIVE ACTION IN WATER STEWARDSHIP

With the aim to improve BCI's approach to water management by shifting from the current water efficiency focus towards a more holistic approach to managing water as a critical natural resource, and towards the concept of water stewardship; the development of a Water Stewardship Plan is now required.

The Water Stewardship Plan includes 5 components:

- I. Mapping and understanding of water resources
- II. Soil moisture management
- III. Efficient irrigation practices to optimise water productivity (applicable to irrigated farms only)
- IV. Water quality management
- V. Collaboration and collective action towards local sustainable use of water

The collective action component aims at promoting the fair use and allocation of water resources amongst users beyond the farm, and up to the watershed level. The identification of opportunities for collaboration and collective action and the implementation of concrete collective action beyond the farm both are a core indicator for the 3 farmer categories.

### Original proposition

Shifting from the previous water efficiency focus towards a more holistic approach to managing water as a critical natural resource, and towards the concept of water stewardship.

The new criterion would require developing a water management plan through 5 components. This would namely include:

- the identification of opportunities for collaboration and collective action as a core indicator;
- the implementation of concrete collective action beyond the farm as an improvement indicator.

### Stakeholder Consultation Results

All stakeholders recognised the critical importance for farmers to establish relationships with local water authorities, water user associations, competing water users, neighbours, etc. However, the following concerns were raised:

- Opportunities for collective action are largely dependent on government policies, with some countries having well established infrastructure and water governance bodies while others have none;
- The implementation of concrete collective action beyond the farm should only apply to Medium Farms and Large Farms, or only Large Farms, who generally have more resources and opportunities to engage with relevant water actors;
- Individual Smallholders do not have the capacity to engage in collective action, although collective actions activities would be implemented at the Producer Unit Level, under the PU manager's leadership and supported by implementing partners.

**Recommendations from the Standard Committee**

Identification of collective action opportunities and taking action should be a core indicator for the 3 farmer categories. Collective action is a key factor of success for water stewardship strategies and is critical to sustainable use of water resources, a major sustainability issue in cotton production.

Considering BCI is testing the concept of water stewardship collective actions in several countries with the aim to test the feasibility, develop good practices and guidance material, and the fact that engagement activities in the Smallholder context will be implemented at the PU level, the Committee believed the criteria would be feasible.

**Council's decision**

The Council approved the Committee's recommendations on the condition that the applicability date for taking collective action would be set within three to five years, to allow for the dissemination of lessons learned through the water pilots. The BCI Secretariat will set the effective date, in line with Council's recommendation, at 1<sup>st</sup> March 2021.

## SOIL MANAGEMENT PLAN – SOIL TYPE IDENTIFICATION

The Soil Management Plan includes 4 components:

- I. Soil type identification and analysis
- II. Maintenance and enhancement of soil structure
- III. Maintenance and enhancement of soil fertility
- IV. Continuous improvement of nutrient cycling.

Soil type identification is proposed as the first component, with the objective of defining soil type and structure. As part of this component, soil testing has been integrated under one indicator to define content in soil macro nutrients through NPK – Nitrogen (N), Phosphorous (P) and Potassium (K) – analysis as well as pH level as a minimum indicator. Both soil type identification and soil testing are required for all three farmer categories as a core indicator.

### Original proposition

Require a soil type identification and soil testing (pH + NPK analysis) for all three farmer categories as a core indicator.

### Stakeholder Consultation Results

Stakeholders raised the following issues:

- soil type identification wouldn't be feasible for all Smallholders due to limited financial and technical resources. BCI should not require soil type identification on a sample basis at Learning Group, PU, or village level;
- soil type identification is useful in term of crop selection, but does not provide information on soil health, which can only be obtained with soil testing.

### Recommendations from the Standard Committee

The Committee agreed on the fact that:

- Soil type identification only gives information on structure and is insufficient for measuring soil health. The indicator should thus be amended to include both soil type identification and soil testing to define content in soil macro nutrients through NPK analysis as well as pH level as a minimum indicator. These analyses can be done through basic soil test kits that are affordable and easy to use.
- For Smallholders and Medium Farms, the BCI Secretariat should consider the need for partnership to be established at PU or Project level with a competent bodies that can provide guidance and financial/technical capacity on soil testing;
- Soil testing should be sample-based at PU level. Upcoming guidance should provide more information on sampling as how soil testing data can be used;
- Soil type identification and soil testing (pH + NPK analysis) should be required for all three farmer categories as a core indicator.

### Council's decision

The Council approved the Committee's recommendations, providing that the guidance:

- specified what is feasible, realistic and still useful in terms of frequency for all three categories and in terms of sample for PUs;
- made a reference to the organic content of the soil as quality indicator;
- put a strong focus on the objective of applying nutrient on a need basis.

## BIODIVERSITY ENHANCEMENT AND LAND USE & THE BIODIVERSITY MANAGEMENT PLAN

Better Cotton farmers have the potential to, and should strive to enhance biodiversity, as opposed to just conserving biodiversity. Thus, the name of Principle 4 was changed from “*Conserve natural habitat*” to “*Biodiversity Enhancement and Land Use*”.

The Biodiversity Management Plan has been designed as a practical tool for conserving and enhancing biodiversity on and surrounding the farm. The criteria is associated with a list of core and improvement indicators applicable to relevant farmer categories with various levels of prescriptions.

The Biodiversity Management Plan includes 5 components:

- I. Identification and mapping of biodiversity resources;
- II. Identification and restoration of degraded areas;
- III. Enhancing populations of beneficial insects as per the IPM plan;
- IV. Ensuring crop rotation;
- V. Protection of riparian areas.

### Original proposition

Integrate a Biodiversity Management Plan designed as a practical tool for conserving and enhancing biodiversity on and surrounding the farm, which includes 5 specific components.

### Stakeholder Consultation Results

A large majority of stakeholders supported the management plan concept and agreed on the

relevance of the 5 components. Main concerns could be summarised as follows:

- I. *Biodiversity resources identification and mapping*  
This component might be difficult to implement for Smallholders, as it would require an initial assessment of biodiversity resources that can only be conducted by external experts.
- II. *Restoration of degraded areas*  
The restoration of degraded areas beyond the farm is likely to be outside the competence of Smallholders and Producer Units; this should thus be kept as an improvement indicator.
- III. *Supporting biological pest control as per the Integrated Pest Management plan*  
Such prescription of a practice is not in line with BCI’s traditional approach, the real objective is to either minimise the impact on, or enhance populations of pollinators and other beneficial insects.
- IV. *Protection of riparian buffers*  
The focus of the component should be on the protection of riparian areas, not buffers, as buffers may be understood as specific conservation intervention measures as opposed to the natural buffers that riparian areas often represent. The creation or expansion of buffers is only a tool that is most commonly – but not always

– available to farmers in order to protect wetlands, water bodies, or existing riparian areas.

V. Crop rotation

Crop rotation is a practice and not a biodiversity enhancement objective in itself, although it should become a core indicator as it is a key condition to ensure biodiversity and ecosystem maintenance. However, crop rotation does not apply to some local context (e.g. some Chinese provinces).

**Recommendations from the Standard Committee & the BCI Secretariat**

The Committee recommended introducing the Biodiversity Management Plan with all 5 components, taking into account the following decisions based on stakeholder's concerns:

I. Biodiversity resources identification and mapping

No Smallholder would be expected to conduct any activity by him/herself. The plan will be built and managed by PU managers, with information flowing from and to Smallholders with the help of trained Field Facilitators. Moreover, 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. This process would be led by Field Facilitators identifying and locating, within and immediately surrounding the LG farming area, key biodiversity values. BCI, supported by suitable experts, will develop a training module on how to conduct simple, participative mapping exercises.

II. Restoration of degraded areas

For Smallholders, the only core indicator proposed is related to the identification of degraded areas, with the implementation of restoration measures, when applicable, only an improvement indicator. Restoration of degraded areas outside the farm boundary is not a core requirement for any farmer category.

III. Supporting biological pest control as per the Integrated Pest Management plan

The component title should be changed from “*Supporting biological pest control*” to “*Enhancing populations of beneficial insects*” and a strong focus on biological pest control should be included in the guidance.

IV. Protection of riparian buffers

The component title should be changed from “*protection of riparian buffers*” to “*protection of riparian areas*”.

VI. Crop rotation

The implementation of crop rotation remains limited to an improvement indicator for all farm categories. The need to build a time-bound plan for crop rotation is proposed to remain a core component of the biodiversity plan.

**Council's decision**

The Council approved the Committee's & Secretariat's recommendations.

## LAND USE CHANGE: A RISK-BASED SIMPLIFIED APPROACH TO HIGH CONSERVATION VALUE (HCV) ASSESSMENT

BCI farmers must implement a BCI risk-based HCV assessment in case of any proposed conversion from non-agricultural land to agricultural land.

In this regard, BCI and the High Conservation Value Resource Network have developed a ground breaking simplified procedure that allows producers to assess the level of risk that any land-conversion poses to HCVs, and leads to the implementation of simplified mitigation measures in cases where elevated risks are identified.

### Original proposition

BCI farmers must adopt the HCV approach when they convert land for the purpose of growing cotton, as a core indicator.

### Stakeholder Consultation Results

A clear majority of stakeholders expressed support to the HCV assessment through the new

risk-based approach. However, some important issues were raised:

- Applicability in some countries: In some countries, National and State legislation have already identified high conservation value areas on maps as restricted zones for development. It is unclear how the proposed HCV methodology might be implemented where robust legislation already exists. There are concerns this proposal may create unnecessary duplication of controls and costs.
- Complexity: The HCV methodology is seen as quite complex and requires expertise to be implemented. However, IP as well as PU managers do not have any experience in this field and farmers are also completely unaware of HCV practices. Besides, the quality of the risk-based approach is dependent on the availability of information at a given location. This will be particularly challenging where farms are largely Smallholders or widely dispersed, and tracking of land use change will be more difficult.
- Scope: Given that a portion of the HCV scope is also livelihood issues, the name of the principle as "*Biodiversity Enhancement*" seemed misleading.

### Recommendations from the Standard Committee

To each of the above concerns, the Committee answered the following:

- Applicability in some countries: In countries where robust legislation exists and is adequately enforced, risks are believed to be negligible and Producers will not need to initiate any further assessments (over and beyond making sure their planned conversion are identified and are legal).
- Complexity: The HCV risk-based simplified approach has been developed by the HCVRN for voluntary standards working with Smallholders. The proposed methodology has been tailored by BCI and HCVRN to the BCI context, and simplified further. Moreover, it is expected that a very small percentage of Producers will be undergoing any land conversion for the purpose of growing cotton. When the HCV procedure is implemented, it will not require any particular expertise from



Smallholders, and PU and Large Farm Managers will be able to implement the methodology using simple guidance and training, with no prior knowledge of HCV required. In the rare events where significant risks exist, in the case of large land conversion in countries where national regulation does not require any, or only requires weak ESIA, BCI will have the necessary safeguards in place to address these risks.

- Scope: The Committee recommended to change the name of the Principle from “*Conserve natural habitat*” to “*Biodiversity Enhancement and Land Use*”

Overall, the Committee highlighted that BCI would be the first voluntary standard to bring the HCV concept in smallholding crop agriculture and that this would constitute another major innovation to the agricultural sector and the standards system community, with another example of an ambitious yet pragmatic and inclusive approach.

The Committee therefore recommended to approve the revised indicator as core for all farmers categories.

**Council's decision**

The Council approved the Committee's recommendations.

## FIBRE QUALITY – FOREIGN CONTAMINATION PREVENTION

With the aim of improving fibre quality and helping to reduce the level of foreign contamination, the use of polypropylene, polyethylene or any synthetic bags should not be used during hand harvesting of cotton. This extends to storage and transportation as an improvement requirement.

This measure however does not apply to BCI countries where harvesting is mechanised.

### Original proposition

Adopt a new indicator to prohibit the use of synthetic bags (polyethylene, polypropylene) and help reduce the level of foreign contamination.

### Stakeholder Consultation Results

Most stakeholders did not support having the new indicator on prohibiting synthetic bags as a core indicator for the following reasons:

- The additional cost of using cotton bags or other alternatives, especially for Smallholders. The indicator should be core for Medium and Large Farms only, as these can more easily afford investing in alternatives;
- In countries where cotton is mechanically harvested (such as the US and Australia), the issue of foreign contamination is not relevant due to specific process excluding it.

Other stakeholders supported including this indicator as it could improve the marketability of Better Cotton and would reduce environmental impacts caused by use of synthetic bags.

### Recommendations from the Standard Committee

The Committee recognised the opportunity to strengthen BCI's focus on fibre quality and to better meet expectations from key actors of the supply chain on quality matters (e.g. ginner and spinners) and environmental stakeholders (such as NGOs and multilateral institutions). Considering this, the Committee recommended to restrict the indicator to hand harvesting, and keep it as an improvement indicator for all three farmer categories.

### Council's decision

The Council approved the Committee's recommendation, with the specific additional request to expand the criterion to storage and transportation.

## GENDER EQUALITY & EQUAL PAYMENT

BCI will continue with the current approach, integrating gender equality issues into existing relevant criteria rather than creating a new criterion.

With this in mind, “*equal payment, irrespective of gender*”, which is part of the three criteria referring to Gender Equality – along with discrimination and record of employment obligation – will have its status changed from improvement to core indicator.

### Original proposition

Develop a specific criterion to ensure Gender equality.

### Stakeholder Consultation Results

Over half of stakeholders supported the proposal to add a specific criterion related to gender equality. Stakeholders who did not support this proposal raised the following concerns:

- Adding a new criterion may not be fit-for-purpose, it would be less efficient than cross-referencing gender equality in existing relevant criteria;
- Gender requirements may not be useful or relevant in some countries where national legislation already enforces non-discrimination.

### Recommendations from the Standard Committee

Creating a new dedicated criterion could make the issue of gender equality more prominent, however it could also create duplication with the existing content under the non-discrimination, salary, and work contract indicators.

The Committee thus recommended to:

- continue with the current approach, integrating gender equality issues into existing relevant criteria rather than creating a new criterion;
- insert a new paragraph in the introduction section of Principle 6 to emphasise the importance of gender equality and explain how gender equality is covered as a cross-cutting theme within the BCI Principles & Criteria;
- making the equal payment indicator core (instead of improvement) as it is considered a fundamental sustainability objective.

### Council’s decision

The Council approved the three Committee’s recommendations and stressed the importance of making gender equality as prominent as possible in the Principles & Criteria.