

FAQs on the new Chain of Custody (CoC) Guidelines V1.4

Date: 23g July 2020

Introduction

This document will help you to answer some of the questions you may have regarding the new version of the Chain of Custody (CoC) Guidelines V1.4, which is effective on 1 August 2020. For further information, please refer to the summary of key changes and comparison between V1.3 with V1.4, which can be found on the BCI website. If you have any further questions, please contact compliance@bettercotton.org

1. Why did BCI conduct a review of the CoC Guidelines?

BCI has conducted the review of the CoC Guidelines with the following objectives:

- To improve clarity, completeness and accuracy of the CoC Guidelines;
- To improve the implementation of CoC requirements by BCI members and Better Cotton Platform (BCP) suppliers
- To improve the consistency of interpretation of CoC requirements by all users.

The updated CoC Guidelines provide clearer requirements which help companies distinguish between those which are mandatory and those which are best practice or guidance. BCI is confident that the new version will address any potential grey areas or ambiguities from the previous version, which will ultimately improve the understanding and implementation of the CoC Guidelines.


2. What are the key changes?

No additional requirements have been added to this new version. BCI's basic Chain of Custody model remains the same – product segregation between farm and gin level, and mass balance after the gin level. The revision focused mainly on minor changes, including removing outdated content, clarifying existing requirements, and restructuring the layout. Key changes to the CoC Guidelines are grouped into the following categories:

- Removal of requirements that are outdated or irrelevant
- Some criteria were split into two for clearer understanding
- Some requirements that were contained in the supporting guidance have been moved to the criteria (e.g. with the use of term 'must')
- Change of structure/layout of the document
- Further elaborations of criteria to avoid confusion
- Clarification of language, including removal of duplicative information, additional new definitions or clarification on existing information/ definitions

Please refer to the summary of key changes and comparison of V1.3 with V1.4 for further details.

3. What is the effective date of the new Guidelines?



Implementation is applicable from the beginning of the harvest season that begins 1 August 2020, as defined by the International Cotton Advisory Committee (ICAC). This means that ginners will need to follow the updated version when they start buying, processing and selling Better Cotton for the new harvest season of 2020. It is important to emphasize that there are no additional requirements in the updated version, so BCI does not foresee the need for any behavioural changes to comply with the CoC requirements. However, please get familiar with the updated version V1.4 and refer to this for all purposes.

4. Do I need to make any adjustments to comply with the CoC Guidelines V1.4?

No, if you have been following the requirements of the CoC Guidelines V1.3 you do not need to make any adjustments to comply with the new version. Nevertheless, you will need to familiarise yourself with the changes in the sections and numbering of different criteria.

5. Will BCI provide any support in helping companies become familiar with the new version?

In order to help companies to become familiar with the updated CoC Guidelines V1.4, BCI has produced the following documents:

- FAQs (this document)
- Summary of key changes
- Comparison of CoC Guidelines V1.3 with v1.4

All are available on the BCI website.

For ginners:

In addition, BCI will provide bespoke training to ginners on all relevant requirements for meeting the CoC Guidelines v1.4. Please contact BCI Country Offices for details.

For other supply chain organisations (those that are post gin and using the mass balance approach):


BCI will also conduct webinars for supply chain organisations. Please check our website or contact BCI for details.

6. Who was involved in the review?

The review was conducted internally by BCI. Two members of the newly established CoC Advisory Group also provided feedback on the draft version. BCI also engaged NEPCON, an independent organisation that provides support and certification services to sustainability schemes, to update the Guidelines and provide suggestions on how to re-word the criteria to make them clearer and auditable.

7. Why did BCI not conduct external stakeholder consultation on the revision?

As a member of ISEAL, BCI follows ISEAL Codes of Good Practice including stakeholder consultation process. The ISEAL Code of Good Practice on Setting Social and Environmental Standards stipulates that, in the case of non-substantive changes to the standard (e.g. to clarify language), the standard-setting organisation does not need to conduct a formal revision process.



The revision of the CoC Guidelines V1.3 focused mainly on minor changes, including removing outdated content, clarifying existing requirements, and restructuring the layout. The need for these changes has been tracked over the last two years, as BCI has recorded feedback from organisations being trained and audited, and from auditors that have used the previous version of the CoC Guidelines.

Note that no additional requirements are being added in the new version. BCI's basic Chain of Custody model remains the same – product segregation between farm and gin level, and mass balance after gin level.

BCI will conduct stakeholder consultation on any major changes to the CoC Guidelines in the future.