

Conformity Indicator Level Guidance

Version 1.2 March 2021

Better Cotton Initiative Principles & Criteria v2.1

Introduction

This is a working document of conformity indicator level guidance for selected Core Indicators in the Better Cotton Principles and Criteria (P&C) v2.1. Further guidance for the remaining indicators will be prepared over the upcoming seasons.

The aim of this conformity indicator level guidance is to:

- Complement the existing P&C guidance and intent so that it extends to the level of Core Indicators (against which Producer compliance is assessed)
- Enable a more consistent understanding among key stakeholders (BCI, verifiers, IPs, etc) of the <u>minimum expectations for compliance</u> in order to improve transparency and credibility of assessment decisions and licensing outcomes.

This indicator level guidance is intended to complement the existing higher-level guidance in the P&C v2.1. It is not mandatory – in that a non-conformity could not be raised against guidance text alone – however, Producers would be expected to interpret the indicators in the context of the guidance provided.

Guidance has initially been developed for a sub-set of high-priority core indicators. This prioritisation has been conducted based on feedback and a consultation process with the BCI Country Teams. This document is to remain separate from the P&C and the Licensing Assessment templates but can be cross-referenced for stakeholders to easily review the indicators with additional conformity guidance.

This document is not to be used as an 'auditing tool' but to support stakeholders, align understanding and encourage a consistent approach to the Better Cotton Assurance Programme Licensing Assessment process.

If any interpretive issues arise in relation to the information presented in this guidance document, the text of the English BCI Principles & Criteria v2.1 will prevail in all instances. BCI is not responsible for any issues arising to any parties as a result of consulting this guidance document.

Readers should be aware that the links listed in this document may change.

If you are unsure of any details on any of the subjects covered, please consult the relevant BCI reference material or contact your local BCI Country Team.



Acronym List

BCI FF	Better Cotton Initiative Field Facilitator
IP	Implementing Partner
LF	Large Farm
P&C	Principles & Criteria
Producer	The unit of compliance and unit of licensing. This is either a Large Farm, or a Producer Unit (managed by a Producer Unit Manager) for smallholders and medium farms
PU	Producer Unit
PUM	Producer Unit Manager
SA	Self-Assessment

General Terms: Definitions

Mapping: The process of mapping, in the BCI context, incorporates the identification of the location and distribution of natural resources within a Producer Unit / Large Farm. For Producer Units, this mapping exercise would be conducted with participation from the PU Manager, Field Facilitators and farmers. As an outcome of this activity, Producers will have increased insights to make more informed decisions i.e. where opportunities for improvement in managing these natural resources are and what topics to focus training /interventions on.

Plan: In the BCI Context, a plan refers to a written document that sets out clear steps to achieve an outcome, including specific activities and timelines. Plans should be realistic and locally-adapted, which means they focus on issues and interventions relevant for a specific PU or LF, and take into account the baseline level of performance for farmers. Where relevant, clear responsibilities or named individuals for leading activities should also be included.

Policy: A policy is an outline of principles and procedures on an issue or topic adopted by a Producer which can guide decisions and a course of action.

System: A system is a way of working using a set of methods, processes or procedures. A system can be used to carry out specific activities, perform tasks or solve problems to achieve a Producer's objective(s).

Time-bound: Within the Principles & Criteria, BCI asks Producers to create several timebound plans. A plan that is time-bound will clearly outline target dates by which specific objectives should be achieved. In some cases, there might be one date that applies to several the objectives. Identifying specific dates, will enable a Producer to monitor performance and understand whether they are on track to achieve the objective.

Timeline: Programmes and plans, in the BCI context, are expected to have chronological timelines which clearly outline key milestones, implementation dates and deadlines with their associated interventions and activities. This visualisation will help Producers to understand resource requirements, monitor performance and be aligned on upcoming tasks to maximise the changes of effective and successful implementation.



Conformity Indicator Level Guidance

Core Indicators	SH	MF	LF	Indicator Guidance
1.1.1 A locally adapted and time- bound plan, based on agro- ecosystem analysis and which identifies appropriate specific practices to implement the five components of Integrated Pest Management, is established.	SH			 The plan should reflect key pest management issues and practices relevant for the specific PU and should be realistic given the current baseline of farmer understanding and practice adoption. The plan should be well understood by PU Managers and FFs and there should be evidence that the plan aligns with actual activities carried out on the ground. Smallholder Producer Units are expected to have a written document setting out the activities for each of these five components of Integrated Pest Management (IPM). Any activities or interventions identified in the IPM plan should be locally specific and have a Producer Unit focus. It is also important to ensure that the plan is also realistic in relation to the number of activities and interventions outlined and whether it is feasible to effectively follow the plan to successful implementation. Farmers should show a good understanding of IPM-related concepts and make informed pest management decisions. At a minimum, BCI Farmers should: understand that not all insects are pests or are damaging to the crop; understand that some insects play a positive role and can help the crop – these 'beneficial' insects should be protected and nurtured; be able to recognise common insects including pests and beneficials (i.e. 2 or 3 most common examples); and
 1.1.2 An Integrated Pest Management Programme is implemented that includes all the following components: (i) growing of a healthy crop; 		MF	LF	The Producer needs to be able to demonstrate that all five elements of IPM are being considered and practiced on the farm or PU and give clear examples of activities or interventions in each of these areas. Any activities or interventions identified in the IPM programme/ <u>plan</u> should be locally specific and have a Producer Unit / Large Farm focus.
 (ii) preventing the build-up of pest populations and of the spread of disease; 				Medium Farm PUs are expected to have a written document setting out the activities for each of these five areas. For individual Large Farms, if there is no written document, the farmer should be able to clearly explain their current and planned

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 (iii) preserving and enhancing populations of beneficial organisms; (iv) regular field observations of the crop's health and key pest and beneficial insects; (v) managing resistance. 				 activities in each of these five areas and provide supporting evidence (such as dates of field observations or monitoring reports). In line with BCI Farmers making pest management decisions based on the implementation of the IPM plan, at a minimum, farmers should: understand that not all insects are pests or are damaging to the crop; understand that some insects play a positive role and can help the crop – these 'beneficial' insects should be protected and nurtured; be able to recognise common insects including pests and beneficials (i.e. 2 or 3 most common examples), and
1.1.3 A timeline for implementing the 5 components of the Integrated Pest Management plan is established.	SH			The <u>timeline</u> needs to be realistic and include specific seasonal dates for activities or interventions (i.e. not only including 3 year 'target' dates). The PU supporting staff (including FFs) should have a good understanding of the timeline and how this was developed. The PU Manager should be able to explain how the PU is making progress against the timeline; i.e. activities planned for Year 1 should have been conducted in Year 1. The PU Manager should also be able to explain whether the timeline has been (or will be) revised for any reason.
1.1.4 There is no calendar or random spraying.	SH	MF	LF	Every BCI Farmer must be able to make pest management decisions (either individually or through external support) based on a minimum level of field observations and analysis and using concepts such as economic thresholds for pest or predator-to-pest ratios. Farmers should be able to clearly explain how and when they decide to spray, and this can be cross checked through reviews of field books, spray records, and/or pesticide receipts. In certain cases, spraying on a specific calendar date relative to the crop cycle (such as a single early season cover spray) may be considered acceptable, provided certain conditions are met. <i>Please refer to page 14 of the BCI P&C v2.1</i> for additional guidance.

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	1.2.1 All pesticides used are registered nationally for the use on cotton.	SH	MF	LF	 BCI Farmers are to only use pesticides which are registered nationally for the use on cotton. The term pesticide includes insecticides, herbicides, fungicides and acaricides, growth regulators, defoliants, conditioners and desiccants, as well as bio-pesticides. This also refers to any substances applied to crops either before or after harvest to protect the commodity from deterioration during storage and transport. In addition, the term pesticide also refers to <i>any substance or mixture of substances</i> intended for preventing, destroying or controlling any pest. BCI Farmers are not to use mixtures of pesticides unless the mixture itself (not individual ingredients) is registered nationally for the use on cotton. The act of mixing active ingredients may interact with the performance of the pesticide and may also increase the toxicity. The scope of the BCI Standard includes soil preparation – any pesticide(s) used at this time by BCI Farmers are to be registered nationally for the use on cotton. When assessing whether pesticides are registered for the use on cotton. PU Manager / Large Farm Managers should be aware of national, regional and state legislation. PU Managers and LF Managers are expected to know which pesticides are in use within their PU / farm. They are also expected to be able to identify if there are cases where pesticides which are not registered for the use on cotton are in use. The assessment of this indicator should also consider information reported through the Self-Assessment, farm-level records (i.e. FFBs) and RIR data.
	1.2.2 All pesticides used are correctly labelled in at least one <i>de facto</i> or <i>de jure</i> official national or applicable official regional language.	SH	MF	LF	Pesticides are correctly labelled in official national or applicable official regional language (<i>de facto</i> or <i>de jure</i>) all the way to the point of use at the field level i.e. transferring to unlabelled bottles for the 'last mile'.
	 1.3.1 Pesticides listed in: (i) Annex A and B of the Stockholm Convention; or (ii) Annexes of the Montreal Protocol; or (iii) Annex III of the Rotterdam 	SH	MF	LF	Producer Units are expected to know what pesticides are currently used by farmers. PU Managers / Large Farm Managers can gather this understanding through farmer surveys, field visits by Field Facilitators, farmer focus groups or a combination of techniques. It should also consider information reported through the Self-Assessment and RI data process.

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Convention; are not used.				Producer Unit Managers are also expected to know whether the pesticides in use are listed in Annex A and B of the Stockholm Convention; or Annexes of the Montreal Protocol; or Annex III of the Rotterdam Convention. More guidance can be provided by BCI Country Teams.
				Producer staff and BCI Farmers should also be aware of the pesticides listed in these categories, know the reasons that the pesticides should not be used and understand the consequences of use (the active ingredient's toxicity which is dangerous to human health and the environment) to prevent any potential future use of pesticides listed in (i) to (iii) of the indicator.
				During Licensing Assessment visits the assessor / verifier can cross-check information relating to pesticide use during focus group discussions and farmer interviews.
				The scope of the BCI Standard includes soil preparation – any pesticide(s) used at this time by BCI Farmers are to not be listed in Annex A and B of the Stockholm Convention; or Annexes of the Montreal Protocol; or Annex III of the Rotterdam Convention.
				For more guidance, please refer to the BCI monocrotophos phase-out training module.
1.4.1 The Producer has a plan to phase out by 2021 pesticides listed in category 1 of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS); Ia of the World Health Organization	SH	MF	LF	As a first step the Producer is expected to identify which pesticides listed in these specific categories are currently used by farmers. Consultation can be based on farmer surveys, field visits by Field Facilitators, farmer focus groups, or a combination of techniques. It should also consider information reported through the Self-Assessment and RI data process.
classification (WHO).				This consultation should be comprehensive and recent enough to establish an accurate baseline. For example, listed pesticides might be used by farmers in only a
1.4.2 The Producer has a plan to phase out by 2024 pesticides listed				couple of villages, or in some cases farmers might have used a listed pesticide in the previous season but not the current season.
in category 2 of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS); Ib of the World Health Organization classification (WHO).	SH	MF	LF	If a consultation shows recent, current, or potential use of listed pesticides under 1.4.1 or 1.4.2, the Producer needs to develop a <u>plan</u> to phase out these pesticides by the target year (i.e. 2021 or 2024). A phase out plan should be clear about how the Producer will seek to identify potential alternatives, understand the availability and accessibility of these alternatives, and how they will carry out a series of activities to

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1.5.1 The Producer has a plan to phase out Pesticides defined as carcinogenic, mutagenic or reprotoxic (CMR) substances according to Categories Ia and Ib of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).	SH	MF	LF	raise awareness and adoption of these alternatives (e.g. farmer training, lead farmer pilot projects, running targeted demonstration plots, participating in local research projects, etc). The expectations for pesticides under 1.5.1 are the same except that no specific phase out deadline needs to be specified. For all phase out plans, the LF Manager or the PU Manager and Field Facilitators should understand the content and details of the plan. They should be able to evidence how activities in the plan have been carried out in practice. PU staff should also be able to explain whether the plan has been (or will be) revised based on progress to date and any challenges faced. The scope of the BCI Standard includes soil preparation – any pesticide(s) used at this time by BCI Farmers are to also be considered as part of the phase out planning. Farmers should also be aware of the pesticides listed in these categories, the reason and timeline to phase them out, and potential alternatives (where relevant).
 1.6.1 The Producer must ensure that any person who prepares and applies pesticides is: (i) Healthy; (ii) Skilled and trained in the application of pesticides; (iii) 18 or older; (iv) not pregnant or nursing. 	SH	MF	LF	Low priority for guidance. <u>Refer to Responsible Use of Pesticides and PPE BCI Training Modules</u>
1.7.1 Pesticides are prepared and applied by persons who correctly use appropriate protective and safety equipment.		MF	LF	Personal Protective Equipment (PPE) is used to control risks associated with pesticides. All PPE should correctly fit each wearer, and users must understand how, when and why to use it. All PPE should be readily available on site, functional and correctly maintained and cleaned. Appropriate PPE for the preparation and application of pesticides is detailed in the PPE training module (link below). During pesticide preparation, PPE requirements include long-sleeved cotton shirt, long cotton trousers, nitrile or neoprene gloves over shirt sleeves, shoes or boots, hat (when spraying overhead). During the application process,

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			 PPE requirements include goggles or a visor must always be worn, and a respirator should be worn if the cotton is tall, in addition to the preparation clothing. All farmers should understand the body parts which must be covered and should explain or demonstrate exactly how this is done in practice. Where possible, this should be cross-checked during field observation and worker interviews to verify that PPE is not only available but consistently used. <u>Refer to Responsible Use of Pesticides and PPE BCI Training Modules</u>
 1.7.2 Minimum Personal Protective Equipment is worn while preparing and applying pesticides, which includes protection of the following body parts from dermal absorption, ingestions and inhalation: (i) Face and airways: eyes, ear canal, nose, scalp (ii) Limbs: arms, forearms, palms, legs, feet (iii) Abdomen and genital area. 	SH		All PPE should correctly fit each wearer, and users must understand how and why to use it. All PPE should be readily available on site, functional and correctly maintained and cleaned. All farmers should understand the body parts which must be covered and should explain or demonstrate exactly how this is done in practice. Where possible, this should be cross-checked during field observation and worker interviews to verify that PPE is not only available but consistently used. In addition to demonstrating an understanding of <i>how</i> they can perform their work safely i.e. what minimum PPE is required, farmers and workers should also be able to explain <i>why</i> wearing minimum PPE is important i.e. to minimise any hazards and associated risks to their health. To fully meet the intent of this indicator, minimum PPE covering all body parts listed in (i) to (iii) must be worn consistently during preparation <i>and</i> spraying. If certain body parts are not covered (e.g. workers refuse to wear gloves or shoes) this would not be fully compliant. Locally adapted solutions for minimum PPE may be acceptable if all body parts identified within this indicator are covered effectively. Recognising structural and cultural challenges exist in some of the regions that BCI operates i.e. lack of availability and access to all PPE, where this is the case, PUs are expected to show they are making year on year progress against this indicator. This includes improvements in farmers' understanding of the issues/hazards and increases in adoption rates over time.

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					Refer to <u>Responsible Use of Pesticides and PPE BCI Training Modules</u> & <u>Understanding Pesticide Toxicity BCI Training Modules</u>
regularly (at season) to e appropriate	ide labels are checked least every spray ensure that the Personal Protective s available for the eing used.			Ŀ	To meet the intent of this indicator, Farm Managers should regularly check pesticide labels to ensure that the appropriate protective and safety equipment which should be used is available and functional.
procedures use and pro Protective E	ng on safe work and the maintenance, per storage of Personal quipment has been all staff who work with			LF	Low priority for guidance
available on mixing and for cleaning application of must fully co legislation fo and disposa these areas must be cor	ated areas must be the farm for storing, nandling pesticides, and pesticide containers and equipment. The areas omply with relevant or the storage, handing I of pesticides. Within , all rinsate and run-off npletely captured so that contamination risk.			LF	Low priority for guidance
Stewardship addresses e components	-bound Water Plan is defined that each of the following s: ng and understanding of	SH	MF	LF	The intent of the Water Stewardship <u>Plan</u> is to record in one document the Producer's overall approach to water management. The plan should set out specific, locally-relevant activities and <u>timelines</u> that cover all elements of water management in points (i) to (v). Note that (iii) on irrigation will not apply to rainfed farms. The Water Stewardship Plan helps the Producer identify which actions they will undertake across

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 water resources; (ii) Managing soil moisture; (iii) Applying efficient irrigation practices to optimise water productivity (applicable to irrigation farms only); (iv) Managing water quality; (v) Engaging in collaboration and collective action to promote sustainable water use. 	 these different elements of water management and serves as a 'roadmap' for prioritizing resources and activities. For Producers located in areas where water scarcity is less of an issue, it is expected that they will still take steps to ensure efficient water use and to monitor water quality to safeguard the PU/LF for the future. To meet the intent of this indicator, a Water Stewardship Plan should: Include objectives related to all relevant components i-v Include activities related to all relevant components i-v (although some may be prioritized for the first year or two, while others may be longer-term) Be realistic and locally-adapted: the plan must make sense given the local conditions of the PU, relevant local water issues, baseline practices, and organisations or resources in the local community Include specific, clearly described activities or interventions (rather than broad concepts like 'carry out mapping') Be well-understood by the PU Manager and Field Facilitators: PU staff should be able to explain why certain activities are included in the plan, should have a good understanding of how and when they will be carried out, and how the overall approach will contribute to sustainable water management Be aligned with practices and progress observed on the ground: for example, if the plan states that all farmers will receive training on a certain topic in Year 1, and no training has been carried out, this would indicate that either the plan needs to be updated, and/or it has not been effectively implemented Activities and interventions outlined as part of the Water Stewardship Plan, where appropriate, it can be deemed acceptable, due to interlinkages and the overlap of activities, for a combined Water Stewardship and Soil Management Plan - see indicator 7.1.1 for more guidance. Where appropriate, it can be deemed acceptable, due to interlinkages and the overlap of activities, for a combined Wa

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				 guidance in the <u>Better Cotton P&C v2.1 pages 32-35</u> for more background context on water management and the different components of the water stewardship plan <u>guidance on water mapping</u> as related to indicator 2.1.3 <u>BCI Training Module on Water Stewardship</u>
2.1.2 A timeline for implementing the five components of the Water Stewardship Plan is established.				The <u>timeline</u> needs to be realistic and include specific dates for activities or interventions (i.e. not only including 3 year 'target' dates). The PU staff should have a good understanding of the timeline and how this was developed. PU Manager should be able to explain how the PU is making progress against the timeline, and whether the timeline has been (or will be) revised for any reason.
	SH			Where necessary, PU Managers can prioritise activities and interventions, this should be conducted via consultation with FFs. Consultation can take place in parallel with CIP consultation (as detailed in the <u>Continuous Improvement Process document</u>). The PU Manager and FFs should all demonstrate a good understanding of why certain issues have been prioritised and they should be able to clearly explain the timeline for the remaining activities that are planned as part of the Water Stewardship Plan.
2.1.3 Water resources are identified, mapped and understood.				The intent of this indicator is to help Producers better understand where their water comes from, how it is used (by themselves and other users), and where the water goes after use on the farm. This information helps to highlight which water issues are most relevant in the local context – for example, managing fertilizer runoff, or improving efficiency of irrigation canals. This information also helps Producers to be aware of other local water users, so they can take steps to manage water as a shared resource.
		MF	LF	<u>Mapping</u> of water resources can vary from simple hand-drawn sketches to sophisticated computer modelling or can include a combination of both approaches. Whether hand-drawn or computer generated, water maps are expected to include the following minimum elements: location of farms, key local water sources such as wells (and other water withdrawal points), flows lines of significant rivers or streams, canals, and/or underground water tables, location of dams, local landmarks (such as farms or community boundaries, roads, villages, etc) and an indication of north direction, scale line, catchment boundaries. Please refer to additional guidance on water mapping within the <u>BCI Guidance on Implementation Challenges document and the Water</u>

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				Stewardship BCI training module for further detail and additional recommended features that can be included. For PUs, it is expected that the water map is developed with participation from the PU Manager, Field Facilitators and farmers. PU Managers are to have access to this water map (either on paper or electronically). PU staff should have a good understanding of why and how the map was developed, and how the map feeds into the overall Water Stewardship Plan. Farmers should also have a basic understanding of how the map was developed and should be able to identify their own local water sources on the map.
pra eva	.4 Soil moisture management ctices to reduce soil water aporation are implemented, as per Water Stewardship Plan.	MF	LF	Low priority for guidance Refer to the BCI Water Stewardship Soil Moisture training module
tecl imp the	.5 Irrigation methods and hnologies are implemented to prove irrigation efficiency, as per Water Stewardship Plan plicable to irrigated farms only).	MF	LF	This indicator is only applicable to irrigated farms. It is expected that the Water Stewardship Plan should outline the specific approaches, activities and/or interventions to improve irrigation efficiency and the associated <u>timeline</u> . To meet the intent of this indicator, the PU Manager or Large Farm Manager should be able to detail the implementation plan and be working towards the roll-out of the irrigation methods and technologies. For example, access to these technologies (due to financial and resource availability reasons) may not be immediate but the roll-out plan for successful implementation should exist which is being followed. PU Managers or Large Farm Managers are expected to understand the baseline irrigation use through consultation with BCI Farmers or workers.
ma	.6 Irrigation timing is planned to ximise water productivity plicable to irrigated farms only).	MF	LF	Low priority for guidance Refer to the BCI Water Stewardship Irrigation training module

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	2.1.7 Irrigation is not conducted on a rigid pre-determined calendar schedule (applicable to irrigated farms only).		MF	LF	Low priority for guidance <u>Refer to the BCI Water Stewardship Irrigation training module</u>
	2.1.8 Risk to water quality is considered when managing and applying nutrients and pesticides, as per the Water Stewardship Plan.		MF	LF	Low priority for guidance Refer to the BCI Water Stewardship Water Quality training module
	2.1.9 Opportunities for collaboration and collective actions (beyond the Producer's unit of production) to achieve sustainable water use are identified.				To meet the intent of this indicator, Producers should have identified specific organisations or initiatives that involve working with other water users or organisations around collective water management. The Producer doesn't yet have to be actively engaged in these initiatives but should understand the opportunities and should have a realistic <u>timeline</u> to participate.
		SH	MF	E LF	Collaboration could include working with neighbouring farmers or other water users, partnering with government and civil society (NGOs) in catchment or aquifer water planning and management, joining public-private partnerships, or numerous other initiatives aimed at improving sustainable water use.
					Refer to more detailed information in <u>Module 1 of the Water Stewardship BCI Training</u> <u>Modules</u> on Mapping and Understanding Water Resources).
	2.1.10 By March 2022, collaboration and collective actions (beyond the Producer's unit of production) towards local sustainable use of water are implemented as per opportunities identified in the Water Stewardship Plan.	SH	MF	LF	To meet the intent of this indicator, the Producer should be <i>actively engaged</i> in collaborative water management activities (the collaborative opportunities identified within 2.1.9), with evidence to support this participation. These activities should be aligned with the Water Stewardship Plan as in 2.1.1
ľ	3.1.1 A time-bound soil management plan is defined that addresses each of the following components:	SH	MF	LF	The Soil Management <u>Plan</u> should set out current and future activities that cover components (i) to (iv) listed in indicator 3.1.1. The <u>timeline</u> for this plan needs to be realistic and include specific seasonal dates for activities or interventions. Producer

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 (i) Identifying and analysing soil type; (ii) Maintaining and enhancing soil structure; (iii) Maintaining and enhancing soil fertility; (iv) Continuously improving nutrient cycling. 			 staff (including FFs) should have an understanding of the timeline and how this was developed. PU Manager / Large Farm Manager should be able to explain how the Producer Unit / Large Farm is progressing against this timeline – whether activities have been conducted in line with the plan or whether the plan will need to be revised. Identifying soil type is an important first step to understand the basic properties of soil on the farm (i.e. size of soil granules (sand, silt and clay) and organic matter), and therefore how the soil should be managed. Soil identification can be evidenced through a map or document showing soil types on the farm or in the local area. Farmers and PU staff should be familiar with the soil types and should understand implications for soil management. The plan should be realistic in relation to the number of activities and interventions outlined and whether it is feasible to effectively follow the plan through to its successful implementation. Activities and interventions outlined as part of the Soil Management Plan, where appropriate, may form part of the Producer's Continuous Improvement Plan - see indicator 7.1.1 for more guidance. Where appropriate, it can be deemed acceptable, due to interlinkages and the overlap of activities, for a combined Water Stewardship and Soil Management Plan and for the separate plans to cross-reference to the other plan, i.e. the Soil Management Plan referencing Section 2 of the Producer's Water Stewardship Plan. Although, all components as identified within indicator 2.1.1 and indicator 3.1.1 must be detailed. <i>Refer to pages 48-54 of the Better Cotton P&C v2.1 and the BCI Soil Health training module for additional guidance on each sub-component of the soil management plan.</i>
3.1.2 A timeline for implementing the four components of the soil management plan is established	SH		Low priority for guidance
3.1.3 Soil testing is conducted that includes NPK and pH analysis. A minimum of 1 soil test per Learning Group on a minimum of 20% of the Learning Groups within a Producer	SH		Soil testing should be carried out at least once per year on at least 20% of LGs (at least one sample per LG). This soil testing requirement is to provide BCI Farmers with information about nutrient and pH levels in order to make more informed soil decisions. If this testing hasn't happened yet, the PU should have a specific plan for testing including how the testing will be done (and by whom), which LGs will be covered, when

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Unit must be conducted each year, and with different Learning Groups each year, so that all Learning Groups are covered over a period of 5 years.			the testing will happen, and how results will be documented and analysed. In subsequent years, the PU should be able to demonstrate the results of the soil testing. The PU Manager and FFs should all demonstrate good understanding about the value of knowing the pH and macro-nutrient content of their soil, the results of recent soil testing, and the impacts for the PU's overall soil management plan and activities. For example, if soil tests show low pH levels in several LGs, FFs should understand this can significantly impact yield and should be able to explain how the PU is already addressing this (i.e. adding lime several months ahead of planting, training farmers on the importance of measuring soil pH, etc). Refer to the <u>BCI training module on Soil Health in the Soil Type Analysis and Soil Fertility sections</u> for additional guidance on soil testing and nutrient replenishment.
3.1.4 Soil testing is conducted that includes NPK and pH analysis. A minimum of 1 soil test per Medium farm on a minimum of 20% of the Medium Farms within a Producer Unit must be conducted each year, and with different Medium Farms each year, so that all Medium Farms are covered over a period of 5 years.	MF		Low priority for guidance
3.1.5 Soil testing that includes NPK and pH analysis to determine the level of nutrients and acidity in the soil is conducted at least once every 5 years.		LF	Low priority for guidance
3.1.6 Soil type is identified and mapped.	MF	LF	The intent of this indicator is for PU Managers and Large Farm Managers to understand the soil types of the farm to learn about the potential restrictions and advantages of the soil. It is expected that the Soil Management Plan will outline the approach and methodology to identify and map the soil type within the Farm. This can

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				 be based on soil testing commissioned directly by the BCI Farmers, the PU Manager / Large Farm Manager or through public maps. If the testing hasn't yet happened, the PU Manager / LF Manager should have a specific plan for testing including how the testing will be done (and by whom), which farms (where relevant) will be covered, when the testing will happen, and how results will be documented and analysed. In subsequent years, the PU Manager / Large Farm Manager should be able to demonstrate the results of the soil testing The PU Manager and Large Farm Manager should demonstrate good understanding about the value of knowing the soil type and structure of their soil, the results of recent soil testing, and impacts for the PU / farm's overall soil management plan and activities. During a verification check by a Group Manager, the IP Coordinator, BCI, or a third-party verifier, you may be asked to share (or access) either a hard copy or soft (electronic) copy of this map or inventory. More guidance for implementation of soil type identification and analysis can be found within the <u>Better Cotton P&C v2.1</u>, page 45 – 54 and in the BCI training module on Soil Health in the Soil Type Analysis and Soil Fertility sections.
 4.1.1 A time-bound Biodiversity Management Plan that addresses each of the five following components, is defined: (i) Identifying and mapping biodiversity resources; (i) Identifying and restoring degraded areas; (iii) Enhancing populations of beneficial insects, as per the Integrated Pest Management plan (Principle 1); (iv) Ensuring crop rotation; (v) Protecting riparian areas. 	SH	MF	LF	Biodiversity refers to the variety or range of life in a particular habitat – plants, animals, insects (including beneficial and pollinators) and micro-organisms. For a Producer Unit or Large Farm, biodiversity includes both the crops that are grown on the farm, as well as the range of natural / non-agricultural vegetation, animals and microbial species growing on and surrounding the farm. Producers should review additional measures to protect and enhance existing biodiversity resources e.g. tree planting using local species to create new habitats for other organisms i.e. beneficial insects and birds). To meet the intent of this indicator, the Biodiversity management <u>Plan</u> is to detail the Producer's current and future approach to biodiversity management. The plan should include specific, locally-relevant activities and <u>timelines</u> that cover all components of biodiversity management in points (i) to (v). Enhancing populations of beneficial insects links closely to components expected within the Integrated Pest Management plan (see indicator 1.1.1 and 1.1.2).

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				 The Biodiversity Management Plan helps the Producer identify which actions they will undertake across these different components of biodiversity management and serves as a 'roadmap' for prioritizing resources and activities. The timeline for this plan needs to be realistic and include specific seasonal dates for activities or interventions. Producer staff (including FFs) should have an understanding of the timeline and how this was developed. PU Manager / Large Farm Manager should be able to explain how the Producer Unit / Large Farm is progressing against this timeline – whether activities have been conducted in line with the plan or whether the plan will need to be revised. It is also important to ensure that the plan is realistic in relation to the number of activities and interventions outlined and whether it is feasible to effectively follow the plan through to its successful implementation. Activities and interventions outlined as part of the Biodiversity Management Plan, where appropriate, may form part of the Producer's Continuous Improvement Plan - see indicator 7.1.1 for more guidance. <i>Refer to:</i> additional guidance on biodiversity mapping [here] for further detail and additional recommended features that can be included. This includes a Biodiversity Management Plan video the Better Cotton P&C v2.1 on pages 57 – 62 and the BCI training module on Biodiversity Management Plan.
4.1.2 A timeline for implementing the five components of the Biodiversity Management Plan is established.	SH			Low priority for guidance. Refer to the <u>Biodiversity Management BCI Training Module</u>
4.1.3 Biodiversity resources are identified and mapped.	SH	MF	LF	The intent of this indicator is to help Producers better understand which animal, vegetal and microbial species are present on and around their farms. Mapping agricultural biodiversity resources helps BCI Farmers to better understand what biodiversity resources are present on and around their farms. It also helps to highlight the interconnection between these resources, the environment and the management systems and farming practices. By being aware, this can help Producers take steps to

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		manage and improve biodiversity levels as part of the <u>planning</u> elements of this principle.
		Biodiversity resources are to be identified and mapped by all Producers. <u>Mapping</u> of biodiversity resources can vary from simple hand-drawn sketches to more professional computerised models (or a combination of both).
		Off-farm biodiversity resource maps are recommended to include the following minimum elements: village boundaries, infrastructure (roads, buildings), water features (rivers, streams, wetlands, dams), major land-uses (farm lands, grazing lands), any patches which are >1hectare of off-farm habitats (grassland, woodlands, forests), and focal species (if appropriate). On-farm biodiversity maps are recommended to include: boundaries of farmed lands, location of on-farm habitats (fields and fallows, trees and home gardens, edges and hedges including strips along roads, fields and tracks, and focal species (if appropriate). Building on or replicating existing maps as long as the scale is correct e.g. water stewardship maps. More details on the requirements and examples of the maps can be found in the BCI Training module on Habitats – Biodiversity (see link below).
		For the Producer Unit context, the identification of biodiversity resources is to be mapped at the farm and village level. For PUs, the process of biodiversity resource identification and mapping is to be participatory and include input from the PU Manager, Field Facilitators and farmers. Please note: <i>BCI has determined a threshold approach for the on-farm mapping exercises which has been defined and implemented at a national level – please reach out to your local BCI country team representative to see if this has been implemented in your region.</i>
		PU Managers are to have access to this map (either on paper or electronically). PU staff should have a good understanding of why and how the map was developed, and how the map feeds into the overall Biodiversity Management Plan. Farmers should also have a basic understanding of how the map was developed and should be able to identify their own local biodiversity resources on the map.
		Where Producer Units have compiled a focal species list, the selected species are to be relevant and familiar to farmers. PU staff are expected to be aware of this list or the local biodiversity resources in the area.

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				Refer to the Biodiversity Management BCI Training Module
4.1.4 Degraded areas on the farm are identified.	SH	MF	MF LF	Degraded areas can be defined as habitats of non-production (off-field) lands (in opposition to cotton production lands) which are going under long-term changes into their natural composition, structure and function due to human-caused processes. Those changes prevent the habitat to naturally regenerate itself. Examples can include areas of high salinity, areas exposed to slash and burn agriculture, areas exposed to soil erosion or waterlogging, deforestation areas, areas exposed to desertification, flooding, areas on which there is an excessive use of fertilisers and pesticides, and areas which have been overgrazed. In the context of Producer Units, it is expected that the PU Manager and Field Facilitators have an awareness of the concept of degraded areas and what that might look like in their specific region. Producers are expected to be aware of any degraded areas within the PU (within farms or adjacent to the boundaries of the farm). This understanding could be gathered via surveys, information gathering, on-site visits and
				 interviews with farmers conducted by the PU Manager or FFs. In the case of Large Farms, the Farm Manager should understand the concept and whether there are any degraded areas present on their farm (or adjacent to the boundaries of the farm). During Licensing Assessments, this information is to be cross-checked by assessors and/ or verifiers through PU staff/ LF Manager interviews to verify knowledge and during on-farm field observations to review results of the degraded areas identification techniques. <i>Refer to the <u>Biodiversity Management BCI Training Module</u></i>

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4.1.5 Measures to restore degraded areas are implemented as per the Biodiversity Management Plan.	MF	LF	 'Restore' in the BCI context refers to activities undertaken by the Producer aiming at returning areas to full productivity which have been affected by land degradation from a variety of causes including soil compaction, salinisation, and nutrient depletion. The intent of this indicator is for PU Managers and Large Farm Managers to roll-out the components of the Biodiversity Management Plan which are associated with restoring degraded areas and enhancing biodiversity levels. It is expected that the Biodiversity Management Plan will outline the specific activities, interventions, approach and methodology to restore degraded areas within the PU / the Farm. The PU Manager and Large Farm Manager should demonstrate a good understanding of the value of restoring degraded areas. To meet the intent of this indicator, the PU Manager or Large Farm Manager should be able to detail the implementation plan and be working towards the roll-out of the restoration methods and technologies. For example, access to these technologies (due to financial and resource availability reasons) may not be immediate but the roll-out plan for successful implementation should exist which is being followed. Measures associated with restoring degraded areas might include the identification of measures / technologies, developing partnerships with local organisations and experts, conducting training and understanding which operating practices contribute to degradation or a reduction in biodiversity.
4.1.6 Measures are implemented to protect water courses and wetlands in and adjacent to the farm, including maintaining and/or restoring appropriate riparian and other buffer zones, as per the Biodiversity Management Plan.	MF	LF	The PU Manager and Large Farm Manager should demonstrate a good understanding about the value of protecting riparian areas and how these areas are often where the most fertile and productive part of the landscape exists. There should be an awareness of whether any water courses or wetlands exist on or close to the farm / any farms in the Producer Unit through the mapping of water resources covered in indicator 2.1.3. It is expected that the Biodiversity Management Plan will outline the specific activities, interventions, approach and methodology to protect water courses and wetland areas within the PU / the Farm. However, to meet the intent of this indicator, the PU Manager or Large Farm Manager should be able to detail the implementation plan and be working towards the roll-out of these identified methods and technologies.

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				There may be the scenario where access to these technologies (due to financial and resource availability reasons) may not be immediate but the roll-out plan for successful implementation should exist which is being followed. Nonetheless, BCI Farmers should understand the benefits. More guidance can be found within the <u>Better Cotton P&C v2.1 on page 62 and the</u> <u>BCI training modules on Biodiversity Management and Water Stewardship</u> in the Mapping and Understanding Water Resources section.
4.2.1 In case of any proposed conversion from non-agricultural land to agricultural land, the BCI High Conservation Value risk-based simplified approach must be implemented	SH	MF	LF	Low priority for guidance Refer to the <u>BCI HCV Procedure and the BCI HCV training module</u>
 5.1.1 Good management practices for the harvest and storage of seed cotton are adopted.	SH	MF	LF	BCI is focused on the farm and therefore on those aspects of cotton production that are under the control of the farmer. When transporting cotton from the farm (when it is imperative that the cotton should be protected from contamination, in order to preserve fibre quality), for example, BCI recognises that the responsibility and therefore the ability to manage contamination risks will vary. However, as it is possible that the farmer may be directly responsible for transporting cotton from the farm to the gin, this situation is included within the scope of this Principle, under Criterion 5.2 (Improvement Indicators). <u>Better Cotton P&C v2.1 Annexure 1 Terms and Definitions</u> details the major fibre attributes either measured by or of importance to the spinning mill and includes a brief indication as to why the attribute is important.
6.1.1 There are no workers below the age of 15 (14 in certain specified countries), or below the minimum age for employment defined by local law (whichever is higher).		MF	LF	BCI defines the minimum age of employment as per the ILO Convention 138 on the Minimum Age for Admission to Employment and Work. The Convention states that the minimum age at which children can start work is 15 (18 for hazardous work).

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			 Within Medium Farm Producer Units and Large Farms, no workers are to be below the age of 15, or below the minimum age for employment defined by local law (whichever is higher). Medium Farm Producer Unit Managers and Large Farm Managers are expected to have a system in place to know the age of workers. It is likely for new workers that this will be part of the recruitment / hiring process. For the remaining workforce within the PU or on the Farm, the PU Manager or Large Farm Manager should have a baseline understanding of the ages of workers and farmers – whether this is from employment records or consultation with farmers. <i>Refer to the Better Cotton P&C v2.1 on page 77</i> for more guidance on implementation.
6.1.2 The Producer has a time-bound plan for the prevention of child labour in accordance with ILO Convention 138.	SH		 Child labour is work that is mentally, physically, socially or morally dangerous and harmful to children. It interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or to combine school attendance with excessively long and heavy work. Producers are expected to have a <u>time-bound plan</u> for the prevention of child labour. The intent of this indicator is to improve the position of child workers through remediation and prevention. Child labour has been highlighted as a common labour concern in the cotton sector. <i>Guidance around the content of the plan can be found in the <u>Better Cotton P&C v2.1 on page 78.</u></i> With prevention of child labour being one of the key outcomes of the plan, all Producers (smallholder) are expected to have a time-bound child labour. The jan itself should outline the current and future approach to improve the position of child workers but also prevent any potential cases of child labour. The <u>timeline</u> for this plan needs to be realistic and include specific seasonal dates for activities or interventions. Producer Unit Managers are expected to have a baseline understanding of the ages of workers and farmers within the PU. This baseline assessment will provide an understanding of whether cases of child labour currently exist to address the situation

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		aware of any potential risks where child labour could occur to feed into the child labour prevention plan. BCI Farmers are to understand the consequences of child labour, what constitutes as acceptable in the smallholder perspective and the importance of child labour eradication.
 6.1.3 There are no workers below the age of 15 (14 in certain specified countries), or below the minimum age for employment defined by local law (whichever is higher) unless they meet all of the following conditions: (i) the child is helping on his/her own family's farm; (ii) the child's work is structured so as to enable him/her to attend school; (iii) the child's work should not be so demanding as to undermine his/her education; (iv) the child should not perform tasks that are hazardous for him/her because of his/her age; (v) the child must be guided – both in terms of learning skills and supervision of tasks – by a family member; (vi) the child has received appropriate training. 	SH	 BCI defines the minimum age of employment as per the ILO Convention 138 on the Minimum Age for Admission to Employment and Work. The Convention states that the minimum age at which children can start work is 15 (18 for hazardous work and 13 for light work). BCI's approach to child labour in family smallholdings seeks to address and secure the child's right to education, health, and developmental well-being, according to age and activity, while recognising the context of family smallholder agriculture in many developing country settings. BCI Farmers should be aware of the concept of minimum age for employment, understand the benefits for the child and what constitutes as acceptable in the smallholder perspective. In line with the intent of indicator 6.1.2, Producer Unit Managers are expected to have a baseline understanding of the ages of workers and farmers within the PU. Where there a scenario of a child working which does not meet the conditions of (i) to (vi), the Producer Unit should have a clear improvement plans in place to remediate the situation. During Licensing Assessments, assessors and/or verifiers can cross-check this information with worker conversations and review school records where possible. More guidance on implementation of Criterion 6.1 can be found in the <u>Better Cotton P&C v2.1 on page 75 – 78.</u>

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6.1.4 A written child labour policy, specifying under which circumstances and for which tasks children can or cannot work or be employed and why, has been communicated to farmers/workers/employees.	SH	MF	LF	Producers are expected to have a written child <u>policy</u> which details the specific tasks which children can or cannot work or be employed and the reasons. This should include details around hazardous work (see indicator 6.2.1 guidance). The policy should be simple in language and clear in content so that it is understandable to those who are responsible for implementing it. This policy should be communicated to farmers / workers / employees. The policy developed and implemented by each Producer is to prevent children working in hazardous conditions or in circumstances where they should not be. For Large Farms with no employees, there is still a requirement to have a written child labour policy. Having a child labour policy also acts as a preventative mechanism; by raising awareness on the conditions that children can and cannot work or be employed. The intent of this indicator is that farmers are expected to be aware of the content of the policy i.e. the specific cases listed in indicators 6.1.3 and 6.2.1 under which under-
				18s can carry out tasks and that the policy exists.
6.2.1 Hazardous work is not conducted by workers under 18.				'Hazardous work' is work that jeopardises children's physical or psychological well- being, due to the nature or conditions of the work. Examples of hazardous work related to cotton production includes pesticide application, operation of heavy machinery, harmful chemicals or sharp equipment. ILO Convention 182 calls upon ILO member countries to determine through national legislation the list of activities that would give rise to hazardous child labour if performed by a worker under the age of 18.
	SH	MF	LF	PU Managers / Large Farm Managers are expected to be aware of the list of hazardous activities which have been defined at a national level and filter this knowledge to PU supporting staff including FFs and to BCI Farmers through training and awareness raising materials.
				BCI Farmers should be aware of the activities which are considered as hazardous and understand why they should not be performed by under 18s. Producers should also have a system in place to know the ages of farmers and workers to also ensure any under 18s are not performing hazardous activities.

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6.3.1 All forms of forced or compulsory, including bonded or trafficked labour, are prohibited.	SH	MF	LF	Refer to the " <u>Decent Work Guidance</u> " document for detailed guidance on forced labour and related indicators
6.4.1 All forms of discrimination are prohibited.		MF	LF	Discrimination in employment means treating people differently and less favourably because of characteristics that are not related to their merit or the inherent requirements of the job. Common grounds for discrimination include – but are not limited to – gender, race, age, ethnicity, religious belief, disability, sexual orientation, marital status, family responsibilities, trade union membership or HIV/AIDS status. Distinctions based on the inherent requirements of a job are not be deemed to be discrimination. Discrimination can take place at many different stages of a working relationship: hiring, on the job (e.g. allocation of work, remuneration, discipline, access to training or promotion, working conditions) and at the end of the working relationship (dismissal). It can include intimidation, harassment (including sexual harassment) or bullying. Non-discrimination measures should apply to all workers. Particularly vulnerable groups in the cotton sector could be women, migrant workers, indigenous or tribal workers. These groups may not have a strong awareness of their rights, may suffer from pre-existing social attitudes and may not be eligible for the same protection under national legislation as citizens or permanent residents (dependent on the group).
6.4.2 A system is in place to detect and remediate any incident of discrimination on the basis of age, gender, ethnicity, nationality, social origin, religion, membership of a trade union or other workers' organisation, or any other characteristics that are not related to merit or the inherent requirements of the job.		MF	LF	Low priority for guidance

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6.4.3 The Producer Ur bound plan to improve disadvantaged groups	the position of			In the BCI Context, 'disadvantaged groups' refer to groups of people that are subjected to discrimination or are susceptible to be subjected to discrimination. This includes (when relevant / applicable to the specific context) the common scenarios for discrimination (race, gender, sexual orientation, etc.) and, also, migrant, indigenous, tribal, ethnic minorities workers. It is important to clarify that some disadvantaged groups (such as migrant communities, people with disabilities or the elderly) may not have a direct link to farmers in the PU; nonetheless, the PU is still expected to identify these groups and <i>include</i> them in the plan. It is expected that the PU will first carry out research and consultation to identify disadvantaged groups in the area – this can be done for example through focus groups with farmers, conversations with community members, or outreach to local NGOs or government organisations. If the PU believes they cannot identify any disadvantaged groups in the local area, they will be expected to explain the steps that were carried out, and how they plan to monitor regularly to ensure the situation does not change. This indicator expects Producers to work to reduce any risks of inequality where there might be a discrimination risk to <i>improve</i> the position of disadvantaged groups which are directly and indirectly linked to the PU. To meet the intent of this indicator, the <u>plan</u> must include specific activities and realistic timelines, and all PU staff should have a good understanding of the activities in the plan. The plan should also be updated regularly and the PU should be able to demonstrate progress against activities with a local women's empowerment NGO in May and June of 2018, the PU would be expected to show that these activities were actually carried out.
6.5.1 Equal wages are workers who perform t irrespective of gender.	he same job,	MF	LF	Low priority for guidance

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6.5.2 There is no evidence of any policy, practice or customary rule that results in the payment of unequal wages on the basis of gender to workers who perform the same job.	SH			Low priority for guidance
6.11.1 Workers have the right to establish or join organisations of their own choosing.		MF	LF	Low priority for guidance
6.11.2 There is no evidence of interference with the establishment and growth of workers' organisations or their activities.		MF	LF	Low priority for guidance
6.11.3 There is no evidence of interference with the right of workers to bargain collectively.		MF	LF	Low priority for guidance
6.13.1 Farmers in the PU are aware of the legally applicable minimum wage/s (statutory national or regional minimum wage applicable to agriculture, collectively agreed wage, industry minimum).	SH	MF	LF	The term 'wages' refers to the total remuneration paid to workers for their labour, including monetary compensation provided on an hourly, daily, weekly or monthly basis, piece work rates, bonuses and in-kind payments, such as food and housing. Piece work rates are wage payments on the basis of a fixed rate according to units or actions completed, such as a certain amount of cotton picked, rather than on the basis of time worked.
				The intent of this indicator is for PU Managers, FFs, Farm Managers, BCI Farmers and workers to show an awareness of the 'minimum wage' concept, <i>why</i> it is integral for decent work promotion and <i>what</i> the legally applicable minimum wage amount is.
				The PU Manager / Farm Manager should understand what the legally applicable minimum wage amount is, where to find the information and how frequently this is updated in order to periodically check the figures are accurate. This information is to be

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				cascaded down to BCI Farmers to encourage them to pay their workers the legal minimum wage or regional wage norms – whichever rate is higher. Where workers are remunerated on a piece basis, it is important that this rate permits them to earn at least the minimum wage.
6.19.1 Use of corporal punishment, mental or physical coercion, sexual harassment or physical or verbal abuse or harassment of any kind, is prohibited.	SH	MF	LF	Refer to the " <u>Decent Work Guidance</u> " document for detailed guidance on forced labour and related indicators
6.20.1 A policy and system for disciplinary measures is available and communicated to workers.		MF	LF	Low priority for guidance
6.20.2 Any disciplinary actions are proportionate to the conduct in question, and the system in place includes fair warning principles.		MF	LF	Low priority for guidance
7.1.1 A Continuous Improvement Plan is available, implemented and monitored according to the applicable BCI Continuous Improvement planning process, and reviewed annually.	SH	MF	LF	Continuous Improvement is at the heart of BCI's approach to increasing the sustainability of cotton farming. Producers are expected to have a written Continuous Improvement Plan (CIP) with locally relevant focus areas. Where available, Producers have the option of utilising a BCI developed <u>CIP template</u> . The Producer's CIP is expected to have identified focus areas, objectives, interventions and year by year adoption targets (including training adoption) according to the P&Cs. The process followed to develop the CIP will vary depending on the Producer category. The overall aim is for a consultative approach to ensure that the CIP is well informed, locally adapted and sufficiently resourced.

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	Producer Units	Large Farms (including those under the Group Assurance Model)
	The process of developing the CIP must be in line with the <u>BCI Continuous</u> <u>Improvement Process</u> to ensure applicability to the local context of the PU and the involvement of all actors within the PU.	Large Farm Managers should ensure their CIP is applicable to the local context of the farm by engaging with stakeholders where appropriate i.e. workers or local institutions/ organisations in the area.
	The PU Manager is expected to have played a significant role in the development through consultation with FFs.	Large Farm Managers should have created a written CIP which is readily available during the licensing assessment visits.
	 The PU Manager and FFs should all demonstrate a good understanding of why certain issues have been included and prioritised in the plan as focus areas, and they should be able to clearly explain the activities that are planned to address these issues. Producer Units can use the optional <u>BCI CIP Template</u> which has been distributed to Implementing Partners. 	Large Farms as part of the Group Assurance Model have the option to use a <u>BCI-provided planning template</u> that combines the CIP and natural resource planning requirements for indicators 2.1.1, 3.1.1, and 4.1.1. If they maintain other documents or plans that meet some of these requirements, they can cite those in the overall planning document.
	All Producer categories are expected to hav progress against their CIP. At the end of the expected to review their progress in implem where appropriate.	e season, all Producer categories are

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7.2.1 A training plan identifying the key sustainability issues to be addressed for the Producer, the name of training provider(s), scheduling and expected participants is available and implemented.				The training plan is important because it sets out in one document the full set of training activities for the PU and helps to ensure the PU Manager and FFs are clear on activities, responsibilities, and <u>timelines</u> . To meet the intent of this indicator, the training plan needs to focus on sustainability issues that are local and relevant for that PU. It should align with priorities in the CIP but should also include training on issues or non-conformities detected during internal/ licensing assessment.
				The PU Manager and FFs should all demonstrate a good understanding of why certain topics have been included in the plan, and they should be able to clearly explain the main content areas for training recently provided. It is essential that FFs have a thorough understanding of the content they are expected to train farmers on, and are able to use training techniques that are clear, relevant, and accessible for farmers.
	SH	MF	LF*	Famers that received training during the current season should have at least a basic understanding/ recall of the training content covered, and should be able to relate this to their current farming practices (note – this level of understanding/ information recall helps to measure whether the training given was accessible to farmers; it is different than measuring practice adoption, which typically happens later)
				It is expected that the training plan is kept up-to-date and reviewed regularly, so that activities as scheduled in the plan reflect the actual delivery and timing of training on the ground (accuracy and completeness of the plan). Trainings should be timed to address sustainability issues at relevant points in the season – for example, training on soil preparation should come before sowing, not a month afterwards. The plan itself should detail specific topics, details of expected participants, the trainer (i.e. PU Manager, FF, Technical Expert), timing and dates of training. Timings for the training i.e. morning, late afternoon, should be scheduled in a way to maximise participation.
				(Planning and Preparation section).
7.2.2 Training materials for Better Cotton Initiative farmers and workers are available to cover Better Cotton Initiative Principles and Criteria Core Indicators, with a focus on key	SH	MF	LF*	This indicator aims to assess whether training materials are fit-for-purpose. For example, do they address the high-priority issues for the PU (based on the CIP and baseline assessments)? Are they accessible for farmers (i.e. no complicated written handouts for farmers with poor literacy / available in local language)?

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sustainability issues in the local context. Best practices (validated locally) related to production are shared with Better Cotton Initiative farmers through appropriate dissemination material in local language.				 The PU Manager and FF should thoroughly understand the content and key points covered by the training materials and should be able to talk about how they regularly revise and improve materials. The PU Manager and FFs should also be able to give examples of how best practices are shared, for example through training and demonstration plots. Farmers should demonstrate a good understanding of main concepts covered through recent training and should be aware of best practices that have been shared at PU level (even if these practices haven't yet been widely adopted) For more guidance, refer to the Internal Management System BCI Training Module (Implementing Content section).
7.2.3 The Producer reports annual data on number of Better Cotton Initiative farmers and workers trained by gender and topic to demonstrate the implementation of the training plan.	SH	MF	LF*	This indicator is one measure of whether adequate training has been carried out in the PU. During the season, the PU should have an up-to-date record of who has attended trainings given so far, and there should be a <u>system</u> to ensure this information is accurate and complete. During farmer and LG visits information from farmers about training attendance (i.e. Learning Group level participant lists) can be checked on a sample basis as an indication of whether training records are complete and accurate.
 7.2.4 The Producer operates a system to: (i) Assess and document the level of adoption of practices promoted through training; (ii) Identify and address the risks associated with adopting the practices promoted through training; (iii) Evaluate the training materials continuously to improve their content and delivery. 	SH	MF	LF*	To meet the intent of this indicator, Producer Units and Large Farms should have a <u>system</u> in place to assess and document the level of adoption, understand the effectiveness of the training and identify where improvements are to be made for continuous improvement. There are various approaches to fulfil this indicator intent, but PU Managers could have discussions with PU supporting staff (i.e. FFs) to celebrate successes to replicate but also to identify improvement opportunities to increase future adoption levels based on participant feedback. Producers should decide on what changes need to be made to the training format, design and content and where additional training will be implemented. As a follow-up to these actions the annual training plan should be amended to reflect these findings.

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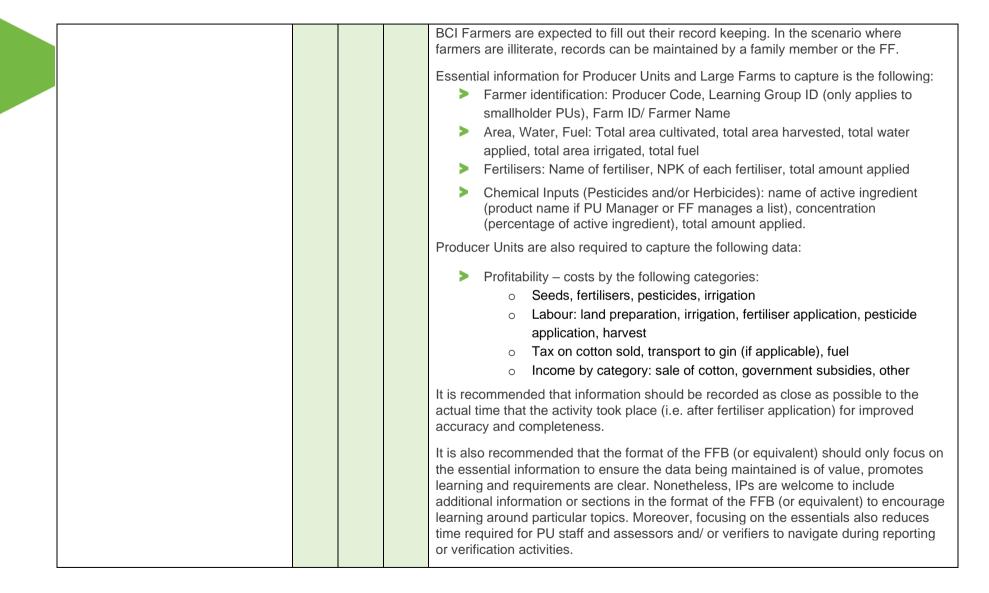


				To understand adoption levels, other assessment and monitoring techniques include field observations, farmer recall of main training points and whether on-farm practices have changed. Producers are expected to document the results of the monitoring and evaluation. <i>More guidance can be found on page 127 of the Better Cotton P&C v2.1 and within the Monitoring and Evaluation section of the BCI Internal Management System training module</i> .
7.3.1 The Producer collects and maintains accurate and complete Producer Unit data in the format required by the Better Cotton Initiative. This will include (but not be limited to) name and contact information of Producer Unit Manager; list of farmers organised into Learning Groups (for smallholder Production Units); age, gender, education level of farmers; expected seed cotton production per farmer and area under cultivation; geo- location of Producer Units; names of gins. The Producer Unit data is updated annually, at the latest by the end of sowing.	SH	MF		For Producer Units, BCI requires basic data about the individual BCI Farmers participating in the BCSS within the remit of the PU. This is to ensure transparency and an aggregated understanding about who is being reached and potentially benefiting from the capacity-building support of the PU. Required Producer Unit data is the following: Producer Unit Manager name and contact information; list of farmers organised into Learning Groups (for smallholder Production Units); age, gender, education level of farmers; expected seed cotton production per farmer and area under cultivation; geo-location of Producer Units; names of gins. The Producer Unit data is to be <u>updated annually</u> , at the latest by the <u>end of sowing</u> . The Producer is expected to maintain complete and accurate Producer Unit data and should have a <u>system</u> in place to ensure the data quality. Participating farmers information can be cross-checked with Farmer Field Books during the Licensing Assessment. The BCI does not yet have a globally harmonised, mandatory template for PU data. This is decided at country level in collaboration with country BCI staff.
7.3.2 The Producer maintains a farm- level record keeping mechanism (e.g. Famer Field Book) for essential production data on inputs and outputs in an accurate manner.	SH	MF	LF	Farm level input and output data is critical to effective farm management. A Producer of more sustainable cotton is one who is fully aware of their individual input use, associated costs, yield achieved, and how profitable they are each season. Farm record keeping can be in the form of Farmer Field Books (FFBs), a field diary, notes in a notebook (if well-organised) or any other record keeping mechanism.

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				It is expected that the Producer has a <u>system</u> in place to monitor / check the accuracy and completeness of the farm level data i.e. FF supporting farmers with filling out their records or periodically ensuring the data has been populated and is accurate. PU Managers / Large Farm Managers should look to gather insights from the data submitted at the PU / Large Farm level to help improve performance. During Licensing Assessments, Group Managers, Farm Managers, BCI assessors or third-party verifiers can cross-check the completeness and accuracy of the farm level records. <u>Refer to the BCI Internal Management System training module for further guidance</u>
7.3.3 The Producer operates a system to collect, compile and report complete and accurate Results Indicator data in accordance with the Results Indicator Reporting template.	SH	MF	LF	 The farm record keeping mechanism (i.e. Farmer Field Book or field diaries) is the primary source for collection of Results Indicator data among farmers. Having a strong a <u>system</u> in place to monitor and/ or validate the accuracy and completeness of the farm level data is a necessity. During Licensing Assessments, BCI assessors or third-party verifiers can cross-check the completeness and accuracy of the farm level records. PU Managers or Farm Managers should be able to explain the planned method to collect and gather Results Indicator data and also the quality checking and validation process (including reviewing the RIR data received for completeness and data quality). In addition, PU Managers or Farm Managers should be able to explain the components of complete Results Indicator data. <u>Refer to the BCI Internal Management System training module for further guidance</u>
7.3.4 The Producer creates and maintains a profile of the farm labour force, including estimates of numbers of workers, as per the Better Cotton Initiative defined worker categories and disaggregated by gender. The	SH	MF	LF	The intent of profiling the farm labour force is to gain more clarity on estimates of the types and numbers (and percentage breakdown by gender) of workers. Categorisation can support the PU Manager or Large Farm Manager with the identification of high-risk groups potentially requiring training or other activities, such as building partnerships with specialised organisations to support decent work outcomes for vulnerable groups. BCI country teams have created country-specific templates for PU and Large Farm use to populate the farm labour and worker profiles. This template is a list of local

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labour profile is updated annually, at the latest at the end of sowing.			categories linked to the standardised BCI classifications which has been introduced for the 2019/20 season. PU Managers should make an estimate (at a minimum) of the number of men and women working on farms in the PU. Local knowledge combined with specific information about a small number of farms should be used to create the estimate. Large Farm Managers are expected to know the labour force and the true and accura figures of the number of men and women farm workers should be reported. The profil is to be updated annually at the latest at the end of sowing. <i>Refer to <u>BCI Farmer Worker Categories document and Annex 4 of the Better Cotton</u> <u>P&C v2.1</u></i>
7.3.5 The Producer ensures that all farmers within the PU maintain receipts of sales of Better Cotton, including the buyer name, date, and volume, for at least one year and is able to collect and submit these sale records to BCI upon request.	SH	MF	 Ensuring all BCI Farmers maintain sales records is important so that Better Cotton flowing into the supply chain can be traced back to licensed BCI Farmers. Under the BCI Chain of Custody Guidelines, gins or agents buying from licensed BCI Farmers a required to maintain purchase records, and in specific cases, BCI may cross-check these records by comparing them with receipts held by farmers. It is important that licensed farmers understand that they may sell their cotton to any buyer, and are not required to sell their cotton as Better Cotton. If farmers are selling to a market or middleman and do not know where their cotton will be ginned, it is sufficient to retain a receipt showing the sale to the market or middleman, along with the date and volume. If the buyer (i.e. gin or middleman) will not issue a receipt to the farmer, the farmer can keep his or her own written self-kept records of volumes of Better Cotton sold (including the buyer, date, and volume). If farmers are illiterate or there are other exceptional circumstances, records can be maintained by the FF or family members. Sales receipts or records should be maintained by farmers, but PU Managers must be able to collect these receipts or self-kept records and share with BCI if requested (for example, as part of BCI's supply chain monitoring work).

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7.3.6 The Producer maintains receipts of sales of Better Cotton, including the buyer name, date, and volume, for at least one year. The LF Manager is able to collect and submit these sale records to BCI upon request.			LF	Similarly, to 7.3.5 indicator requirement for Producer Units (smallholder and medium farms), Large Farms are required to maintain receipts for Better Cotton sales which can be submitted to BCI upon request.
 7.4.1 The Producer operates a system to: (i) Identify and address the risks of non-conformity with core indicators; (ii) Plan and enforce the implementation of Corrective Actions resulting from monitoring activities. 	SH	MF	LF	The intent of this indicator is for the Producer to gather insights around potential activities or interventions (corrective actions, areas of risk or opportunities for improvement) which can be implemented to increase performance and allow the Producer to work towards continuous improvement. <i>Specific guidance on implementation can be found in the <u>Better Cotton P&C v2.1 on page 132.</u> Producers are expected to identify not only current non-conformities but also <i>potential</i> risks and compliance issues. Insights can be gathered through many processes, including internal monitoring, post-training evaluation, self-assessment and licensing assessment. Whenever risks and/or compliance issues (current or potential) are identified, Producers must ensure that they have effective mechanisms in place as part of their internal management system processes to manage these, through the planning and implementation of appropriate corrective actions.</i>

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Reference Materials

Below is a list of the documents, guidance and training materials which have been referred to within this document, if you do not have immediate access to the documents please do not hesitate to get in touch with your local BCI Country Team representative.

Better Cotton Initiative Principles and Criteria

Better Cotton Initiative Principles and Criteria v2.1, 1 March 2018 [link]

BCI Guidance Documents

BCI CIP Producer Unit Template_Optional v1.0 [Dropbox link]

BCI Continuous Improvement Process v1.0 [Dropbox link]

BCI Guidance on Implementation Challenges [Dropbox link]

BCI HCV Procedure: Smallholders v0.1 [link]

BCI HCV Procedure: Medium and Large Farm v0.1 [link]

BCI Farmer Worker Categories [Dropbox link] [Annex 4 Principles and Criteria v2.1: link]

BCI Resource Planning Template: US Group Assurance Model_Large Farms [Dropbox link] BCI Decent Work Assessment Guidance [Dropbox link]

BCI Training Modules

Face to Face Training Material

- Biodiversity (Overview, Introduction, Focal Species, Habitats, Biodiversity Indicator Checklist, Setting Improvement Targets and video) [Dropbox link]
- Gender [Dropbox link]
- HCV (Overview, Introduction, Implementing the Approach, Training Exercises) [Dropbox link]
- Internal Management System (IMS) (IMS Overview, CIP, Data Management, Training Planning and Preparation, Training Implementation and Evaluation, Importance of Data management, Results Indicators and Data Quality, Labour Profile and Sales Records) [Dropbox link]
- Integrated Pest Management (IPM) (Generic scope and Calendar Spraying, Generic rationale for pesticide reduction, Growing a Healthy Crop, Preventing Pest & Disease Spread, Beneficial Organisms, Non-chemical control methods, Smallholder Decision Making, Managing Resistance) [Dropbox link]
- Responsible Use of Pesticides and PPE (Personal Protective Equipment) (Pesticide risks, Understanding Pesticide labels, Handling and Preparing Pesticides, Applying Pesticides Responsibly, Use of PPE) [Dropbox link]
- Soil Health (Overview, Soil as a Natural Resource, Soil Type analysis, Soil Structure, Soil Fertility, Implementing the Soil Management Plan) [Dropbox link]
- Understanding Pesticide Toxicity (Pesticides and Toxicity Classification, Approach to Pesticides, Impacts on Human Health, Replacing HHPs, Monocrotophos phase out) [Dropbox link]
- Water Stewardship (Overview, Mapping and understanding water resources, Soil moisture management, Efficient irrigation practices, Water quality) [Dropbox link]



Version Updates

Version	Date	Revision
1.0	June 2019	The first version of the Conformity Indicator Level Guidance released
1.1	March 2020	Guidance added for the following Core Indicators: 1.7.1, 1.7.3, 4.1.3, 4.1.4, 6.3.1 and 7.3.3
		Additional clarifications added for the following Core Indicators: 1.2.1, 1.3.1, 1.4.1, 1.4.2, 1.5.1, 1.7.2 and 7.3.2
1.2	March 2021	Guidance added for the following Core Indicators: 6.3.1, 6.19.1
		Decent Work Assessment Guidance added to Reference Material section of document