



Principles & Criteria Revision Public Stakeholder Consultation

Summary of feedback on the draft text
of the new Principles & Criteria

About this document

This document summarises the feedback collected over the course of the Public Stakeholder Consultation - conducted by Better Cotton between July 28 and September 30, 2022 - and the ways in which this is incorporated in the final version of the Principles and Criteria (P&C) v.3.0.

The Public Stakeholder Consultation consisted of a range of online and offline activities, including a global online survey, country-level consultations and targeted outreach.

We would like to thank all stakeholders who participated in the consultation for their valuable input.

The P&C v.3.0 received formal approval from the Better Cotton Council on February 7, 2023, and the new standard will become effective for licensing starting in the 2024/25 season.

More information on the Principles and Criteria Revision can be found on our website at: <https://bettercotton.org/better-cotton-principles-and-criteria-revision/>



Document outline

- 🌱 Process Overview
- 🌱 Public Stakeholder Consultation: Key figures
- 🌱 Summary of Feedback and Follow-up
- 🌱 Guidance on the P&C
- 🌱 Contacts



Process Overview

Revision of Better Cotton's Principles and Criteria

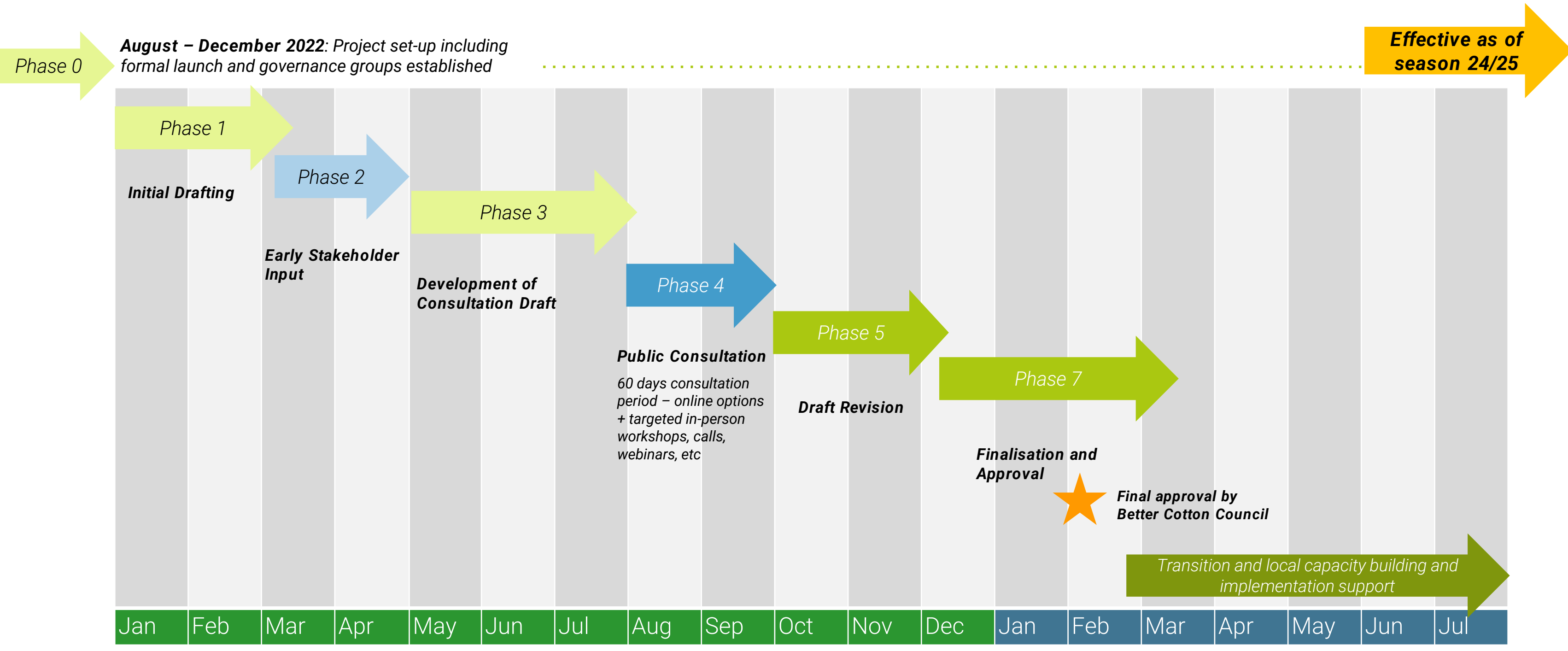
In line with codes of good practice for voluntary standards, Better Cotton periodically reviews its Principles and Criteria.

The Principles and Criteria were first published in 2010 and were formally revised between 2015 and 2017 and again between October 2021 and February 2023.

The aim of the latest revision was to strengthen the Better Cotton Principles and Criteria (P&C) to ensure they continue to meet best practice, are effective and locally-relevant, and align with [Better Cotton's 2030 strategy](#).

Between 28 July and 30 September 2022, Better Cotton ran a **Public Stakeholder Consultation** on the draft text of the new Principles and Criteria. The Consultation is a fundamental requirement of ISEAL's [Standard-Setting Code of Good Practice v.6.0](#), which sets out best practice guidelines to develop or revise sustainability standards.

The Public Consultation in the Overall P&C Revision Timeline





Public
Stakeholder
Consultation
Key figures

Outreach activities during the Consultation

ONLINE SURVEY

Global and open to all stakeholders

COUNTRY-LEVEL CONSULTATIONS

In-person activities with PUs, Farmers, Workers, Disadvantaged Groups...

TARGETED OUTREACH

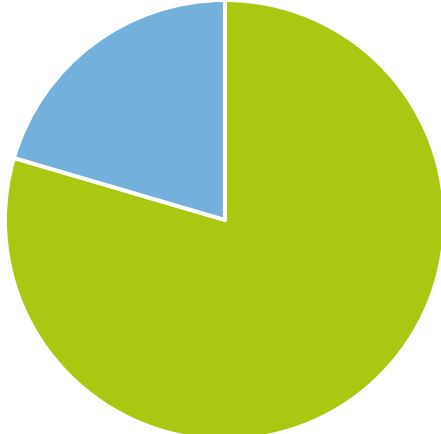
International Organisations, CSOs, Experts,...



Online Survey

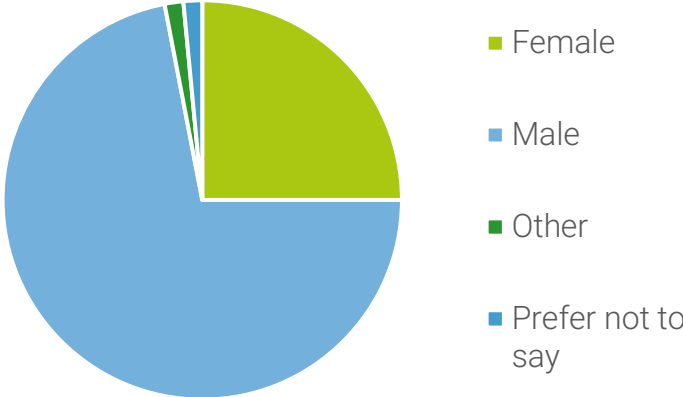
Note: these are the results of the online survey only. They do not include data from country-level activities and targeted outreach.

132 Responses to the Online Survey

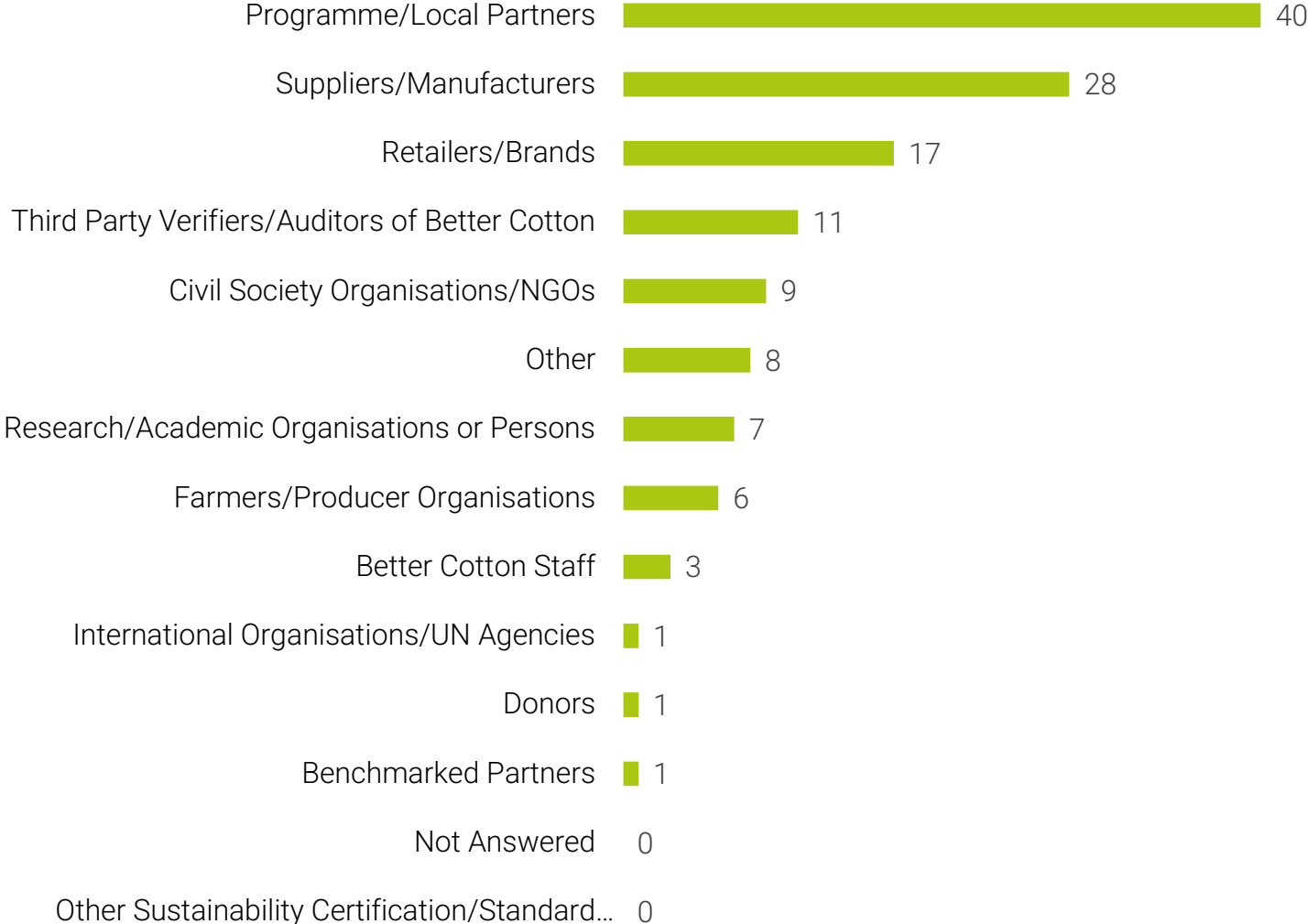


105 of which responding on behalf of their organisation

Gender ratio (as self-identified by respondents)



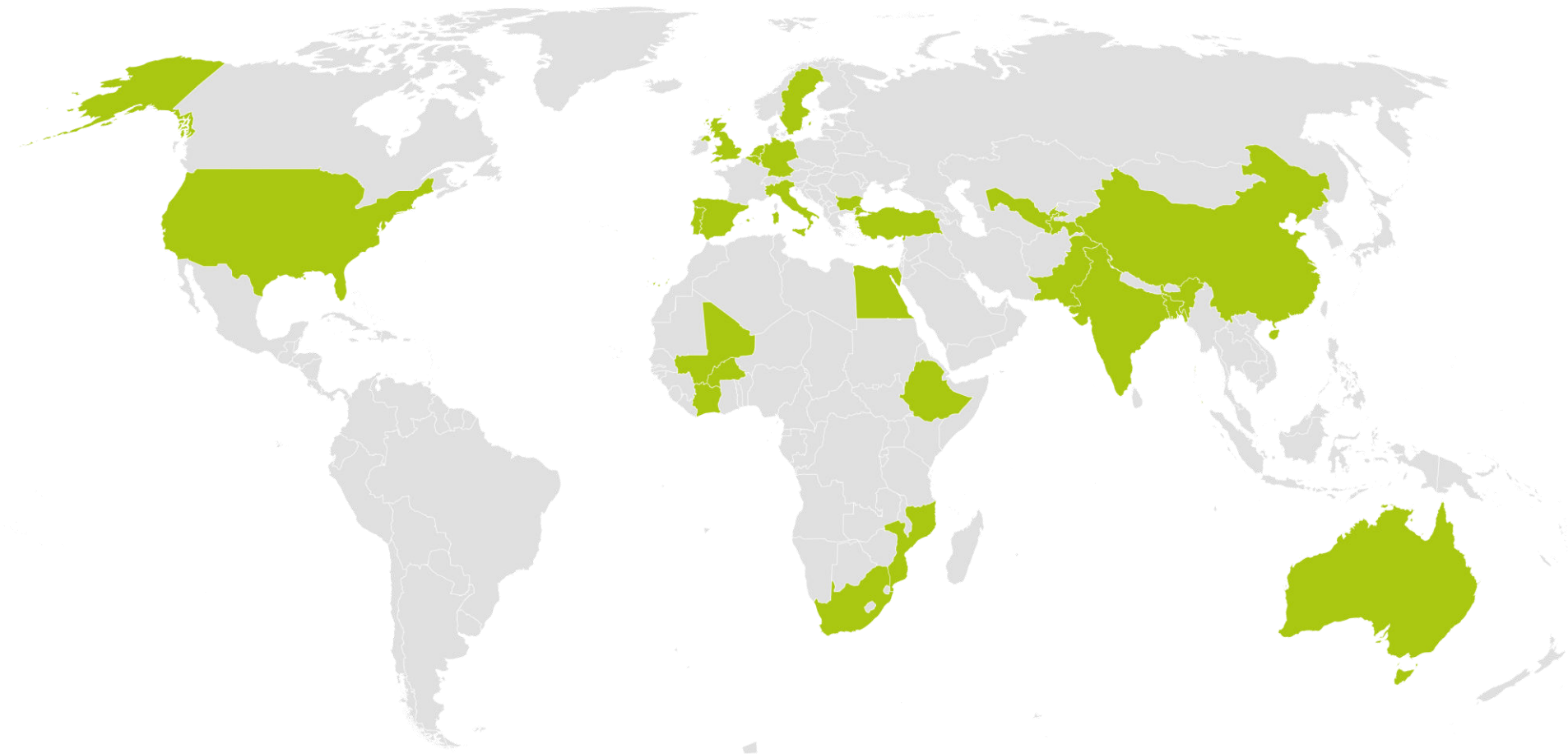
Stakeholder Groups



Online Survey

Note: these are the results of the online survey only. They do not include data from country-level activities and targeted outreach.

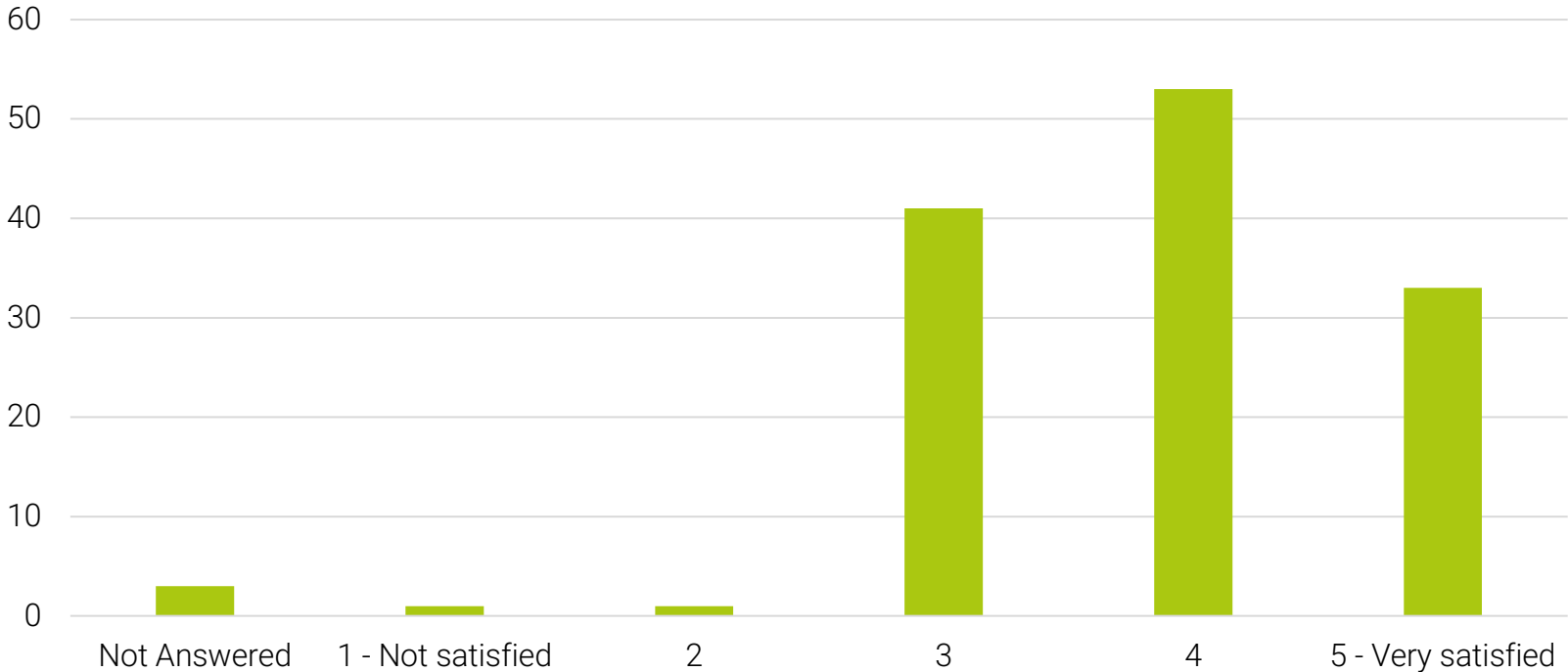
- Respondents were asked to indicate which country their inputs would refer to. **25 countries were represented:** Australia, Bangladesh, Belgium, Bulgaria, Burkina, China, Egypt, Ethiopia, Germany, India, Italy, Ivory Coast, Mali, Mozambique, Netherlands, Pakistan, Portugal, South Africa, Spain, Sweden, Tajikistan, Turkey, United Kingdom, United States, and Uzbekistan.
- Additionally, 14 out of 132 respondents indicated that their perspective and expertise was 'Global', rather than linked to a specific country.
- The countries with the highest number of respondents were India (35), Pakistan (24), and Turkey (10).



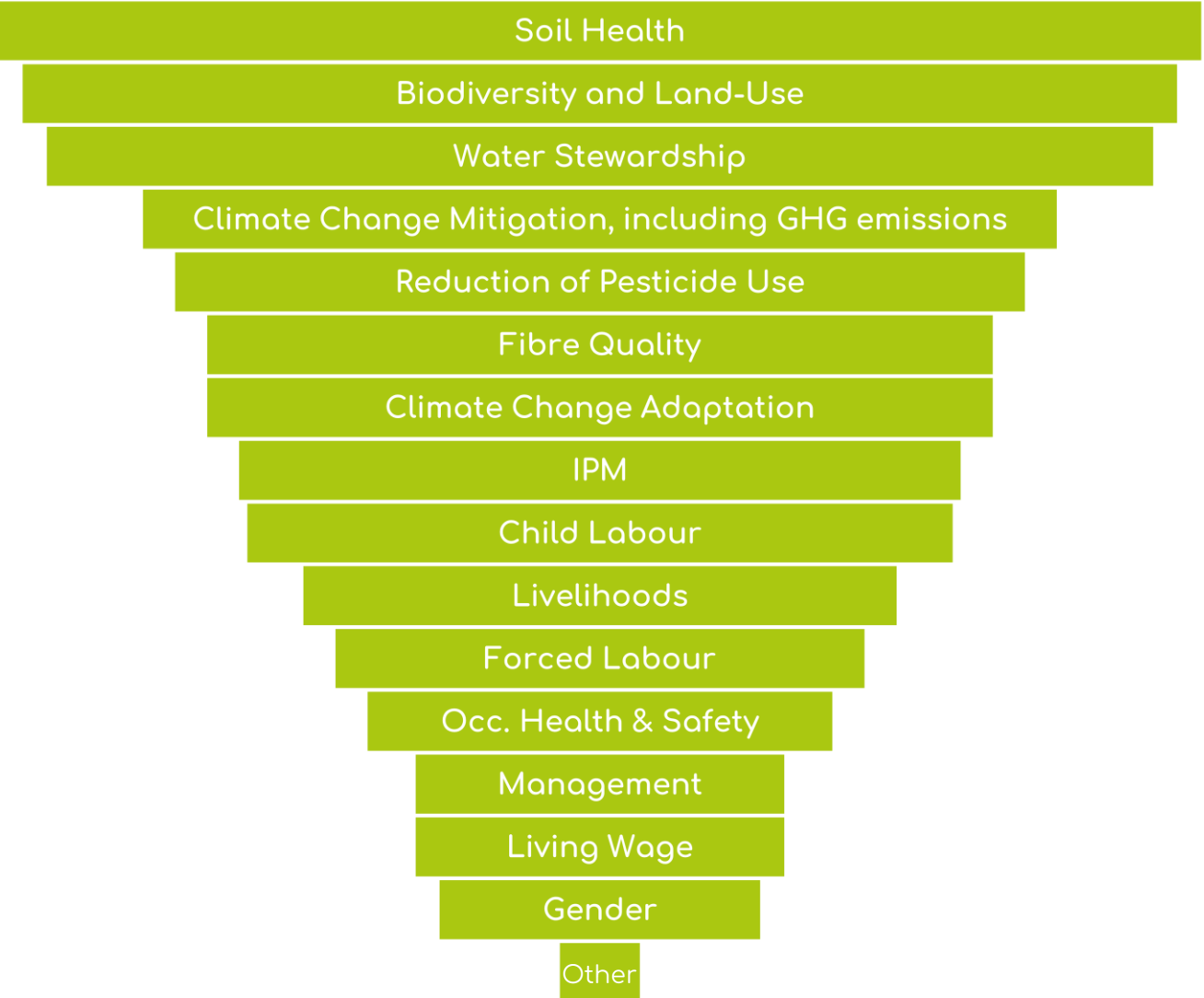
Online Survey

Note: these are the results of the online survey only. They do not include data from country-level activities and targeted outreach.

Overall satisfaction with draft on a scale from 1-5
(61.95% of respondents were satisfied to very satisfied)



Key sustainability priorities the P&C should tackle
(Participants were requested to select top 5)



Most of the respondents assessed their knowledge of the cotton sector and of Better Cotton as **medium to high**.



General Feedback – examples of comments

This revision is really good as we have **avoided duplication** by clubbing soil, water & biodiversity under Natural Resources. Also the management principle with **reduced paper work** will really encouraged to allow time for the field implementation for field workers.

Now its time to **work on climate change** issue and I am happy that Better Cotton network is focusing on climate change as we all know that climate change effect are verse on rural livelihood as compare to urban livelihood. I hope that Better Cotton, with the collaboration of its stakeholders, will play an important role in the future and **provide practical base activity, strategies** for climate change mitigation.

I think it is a significant improvement from the previous version. **Training of all stakeholders** will be needed to ensure effective understanding and implementation of the P&C devised in this version.

Availability and reliability of data are compulsory in Better Cotton project. If no data, no clear traceability, no concrete improvement results... no advantage to continue to choose BC instead on other kind of cotton.

Much of the world still discusses female vs male, but if Better Cotton is developing new, **forward-thinking language** in policy, it most definitely should focus on gender equality period, not gender equality between male and female. There is an opportunity here to **align language** with the very **wide gender spectrum**.

Country-level Feedback and Targeted Outreach

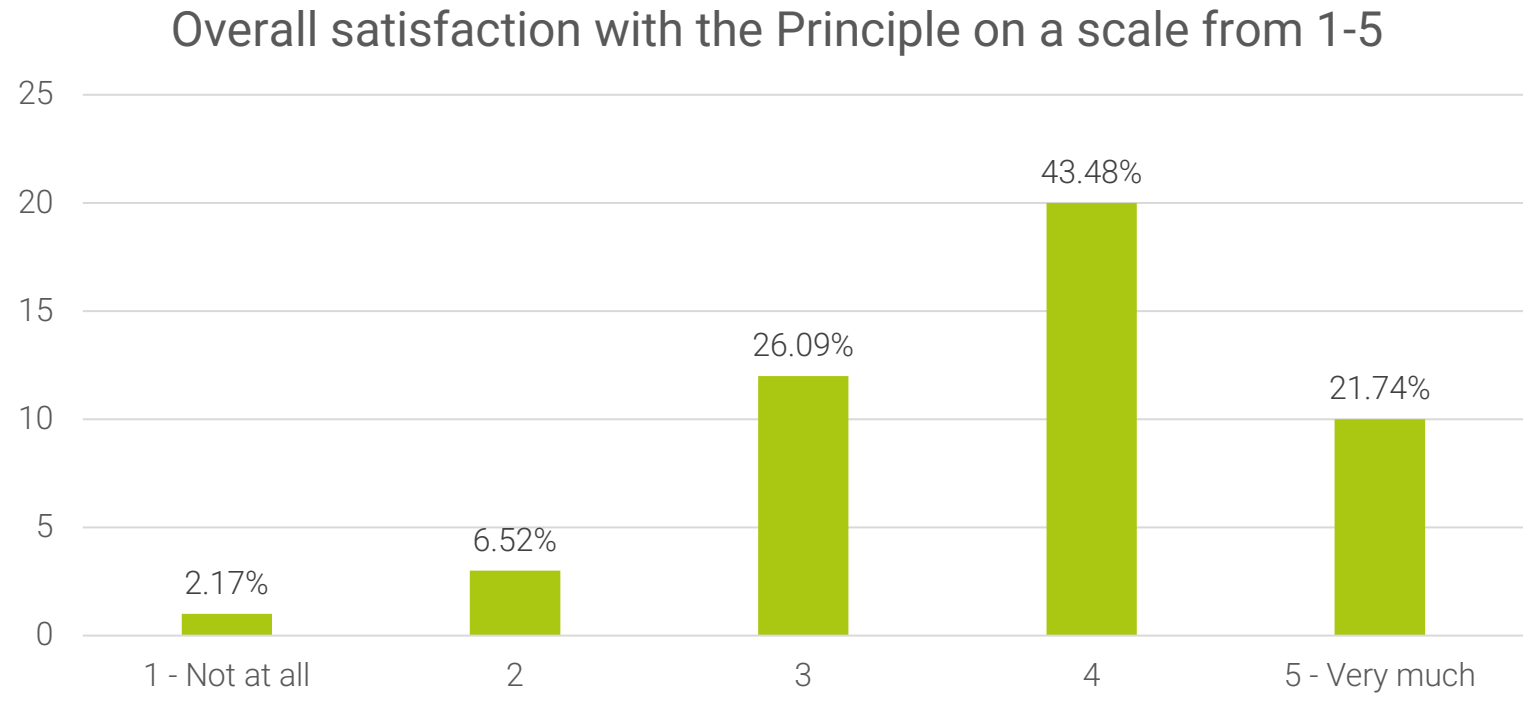
- 🌱 Offline engagement activities were conducted by Better Cotton staff in Australia, Brazil, Egypt, Greece, India, Mali, Mozambique, Pakistan, South Africa, Tajikistan, Turkey, and the United States.
- 🌱 These activities included: one-to-one discussions, focus group meetings, workshops, calls, interviews, and more. They have been planned in accordance with the local context, and targeted local institutions, research bodies, civil society organisations, Better Cotton programme partners and members, farmers and workers, and disadvantaged groups as locally relevant.
- 🌱 Inputs gathered during the consultations were consolidated by Better Cotton country teams and shared with the global secretariat, which integrated them in the overall feedback.
- 🌱 Targeted outreach at the global level was aimed at consulting with research institutions, international organisations, and civil society organisations on the topics covered by Principle 2: Natural Resources, Principle 3: Crop Protection, Principle 5: Decent Work, and about Gender and Social Inclusion (GESI).



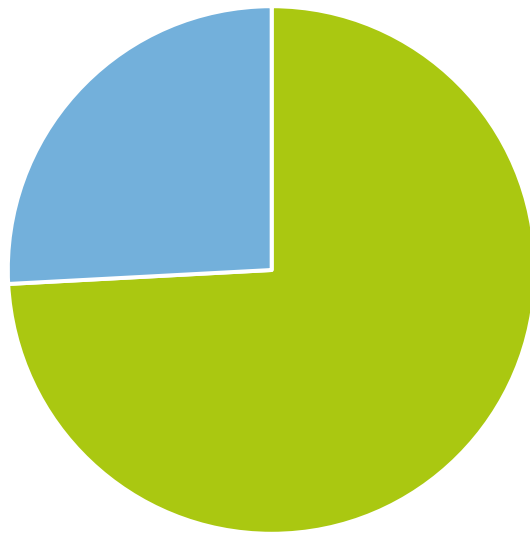
Summary of Feedback and Follow-up

Principle 1: Management

Note: these are the results of the online survey only. They do not include data from country-level activities and targeted outreach.



46 out of 132 respondents to the online survey have rated this principle



Principle 1: Management

Summary of Feedback

- 🌱 Request for clarification on the difference between **Management approach** and **Continuous improvement**, and for providing clear guidance and **tools**.
- 🌱 Some comments around the importance of meaningful **data collection**.
- 🌱 Some concerns about increased **documentation**.
- 🌱 Comments about importance of appropriate training and guidance around the **Climate Change** criterion (1.7).

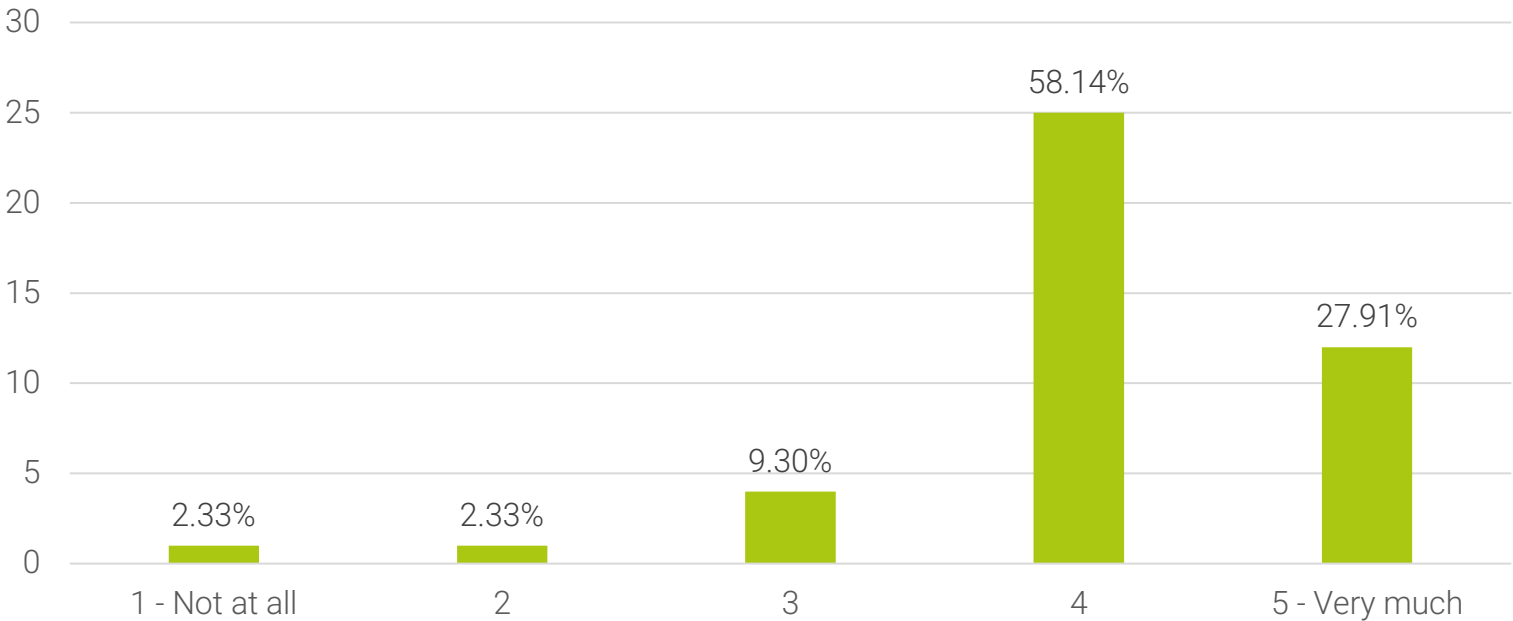
Follow-up by Better Cotton

- 🌱 Further **clarification on the Management requirements** is provided in indicator-level guidance in the P&C (see criterion 1.1). Further guidance, tools and templates will be developed in the transition period after the launch of the new Standard.
 - 🌱 Agreement on the importance of **data collection**. This will be ensured by the Farm Data Requirement document (see criterion 1.2).
 - 🌱 The amount of **documentation** to be provided will be carefully considered when developing related Assurance Materials.
 - 🌱 Training and guidance on the **Climate Change** criterion (1.7) will be developed in time for the coming into effect of the new P&C.
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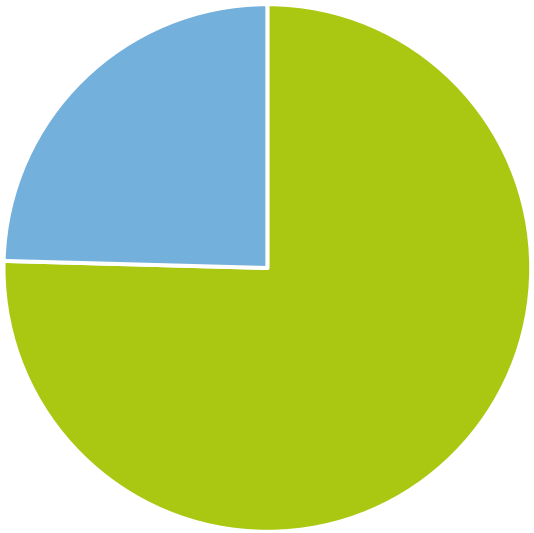
Principle 2: Natural Resources

Note: these are the results of the online survey only. They do not include data from country-level activities and targeted outreach.

Overall satisfaction with the Principle on a scale from 1-5



43 out of 132 respondents to the online survey have rated this principle



Principle 2: Natural Resources

Summary of Feedback

- 🌱 Several comments on the importance of clearly defining Better Cotton's approach to **regenerative agriculture** was highlighted. However, divergent opinions were received on whether regenerative agriculture should be mentioned in the Standard.
- 🌱 Various inputs on the importance of defining **thresholds** for our three soil health indicators for implementation and auditing, but also a number of comments raised that no thresholds can be defined – and met - at global level. A couple of comments on how thresholds might be misleading, as often practices are mixed and matched, and hence thresholds might not always be reached in all three indicators.
- 🌱 **Minimizing fertilizers** is important for climate change mitigation and adaptation. However, this poses feasibility challenges in many countries (e.g., already at optimum level, lack of good alternatives, etc.).
- 🌱 Some wordsmithing and clarifications are needed on the importance of **soil or plant testing and analysis** as a prerequisite for the requirement around fertiliser applications (4R approach).
- 🌱 **Biodiversity** and **degraded areas** should be looked at in a coordinated manner. Clear definition of concepts (“degraded areas”, “natural habitats”, etc.) needed. Importance of raising awareness in an appropriate manner (not through mapping).
- 🌱 Good definitions of **HCV/non-conversion of natural ecosystems** to be developed. Some feasibility challenges were identified in different countries.

Principle 2: Natural Resources

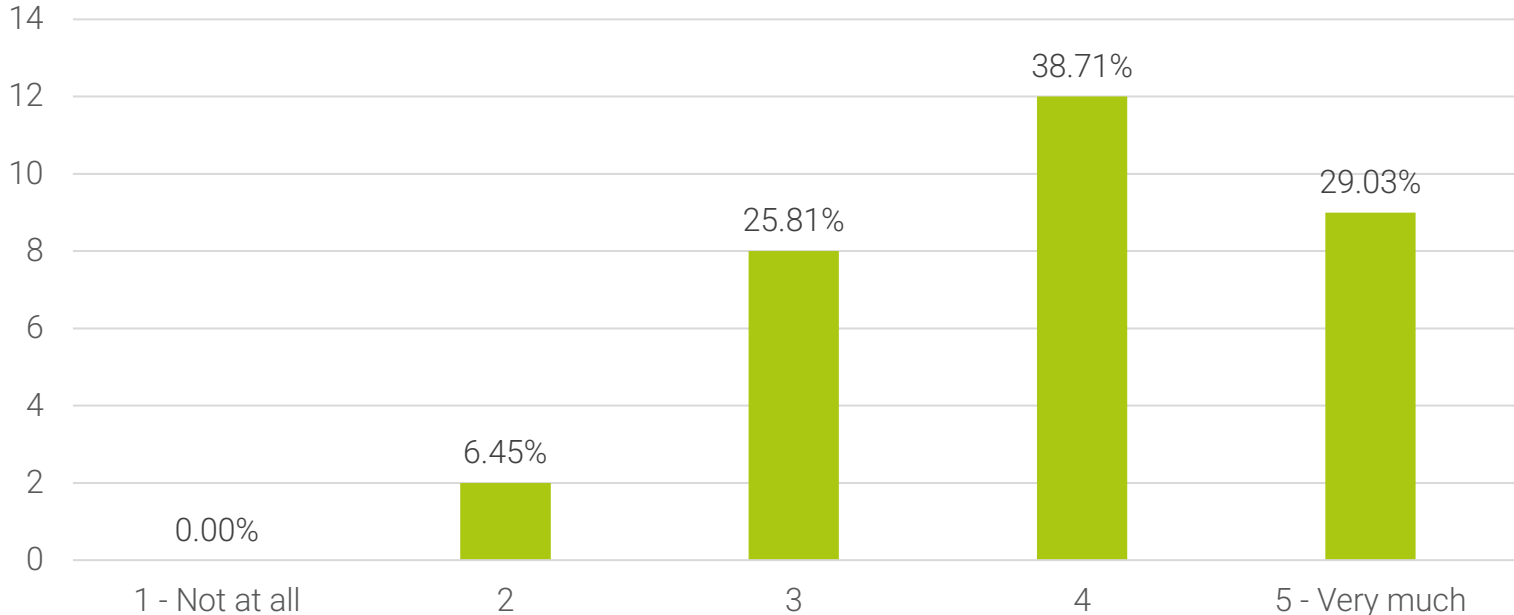
Follow-up by Better Cotton

- 🌱 Principle 2 now includes a text box dedicated to Better Cotton's approach to **regenerative agriculture** and how regenerative agriculture practices are addressed by the P&C.
- 🌱 Setting global **thresholds for the soil health indicators** (2.1.1 – 2.1.3) will be avoided. Adjusted indicator guidance specifies that the intent is to see improvement in practice adoption over time.
- 🌱 The indicator on **minimizing synthetic fertilizer** use (2.1.5) has been reworded to acknowledge feasibility challenges.
- 🌱 The wording of the indicator on optimizing fertilizer use (2.1.4) has been adapted and the indicator guidance clarifies that **soil or plant analysis/testing** are a pre-requisite for this indicator.
- 🌱 Indicator wording has been adapted to ensure conservation and restoring measures (both for **biodiversity** and **degraded areas**) are in line with locally or regionally specific priorities, and need for awareness-raising is highlighted in indicator guidance (see indicators 2.3.2 and 2.3.3). Annex 3 (Glossary) provides definitions, and further global and local guidance will support implementation.
- 🌱 The P&C will be accompanied by a document outlining a land conversion risk assessment procedure for **HCV and natural ecosystems**. Further guidance will be developed, if needed, in the transition year (please see indicators 2.4.1 and 2.4.2).

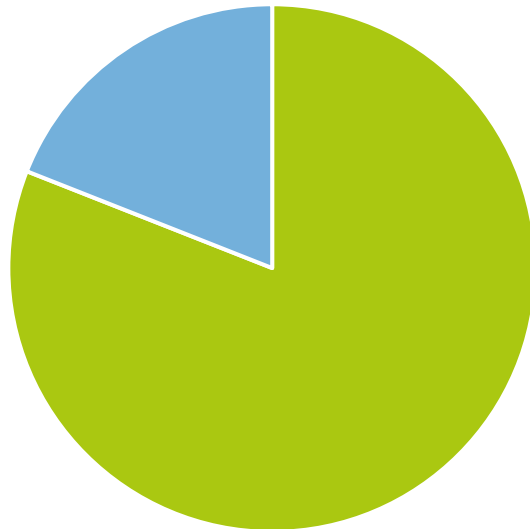
Principle 3: Crop Protection

Note: these are the results of the online survey only. They do not include data from country-level activities and targeted outreach.

Overall satisfaction with the Principle on a scale from 1-5



31 out of 132 respondents to the online survey have rated this principle



Principle 3: Crop Protection

Summary of Feedback

- 🌱 Suggestion to define '**pesticides**' more clearly and specify that the term includes insecticides, herbicides, and fungicides.
 - 🌱 **IPM**: Numerous comments raised on the notion of 'prioritizing' non-chemical alternatives, some stakeholders (e.g. Australia) suggest instead to say 'integrating' **non-chemical alternatives**. Suggestion also to use 'minimizing' instead of 'banning' for use of **HHPs**.
 - 🌱 Point made that **pest thresholds** applies only to insecticides/miticides and not herbicides/weedicides.
 - 🌱 Under IPM indicators, it has been noted that the aim should be to **reduce risk of pest build-up**, not to prevent completely.
 - 🌱 **Seed varieties**: some serious concerns on Partners being able to promote specific varieties.
 - 🌱 Feasibility challenges around avoidance of **pesticides mixtures**, as they are permitted by law in some countries.
 - 🌱 **HHPs**: Challenges with phasing-out where no alternatives exist; comments on the fact that lack of Better Cotton alignment with national approval of pesticides is challenging for farmers.
 - 🌱 Specific concerns cited around **CMR phase out deadline** (US, Brazil, Australia, Mozambique) as being not possible to meet.
 - 🌱 More clarity needed around definitions and specific hazards related to **GHS classification** system and WHO categories.
 - 🌱 Feasibility challenges on **appropriate PPE** (cost and availability). Concerns on funding and usage in very hot conditions.
 - 🌱 **Pesticide container** handling: feedback on container disposal and recycling varies greatly across countries.
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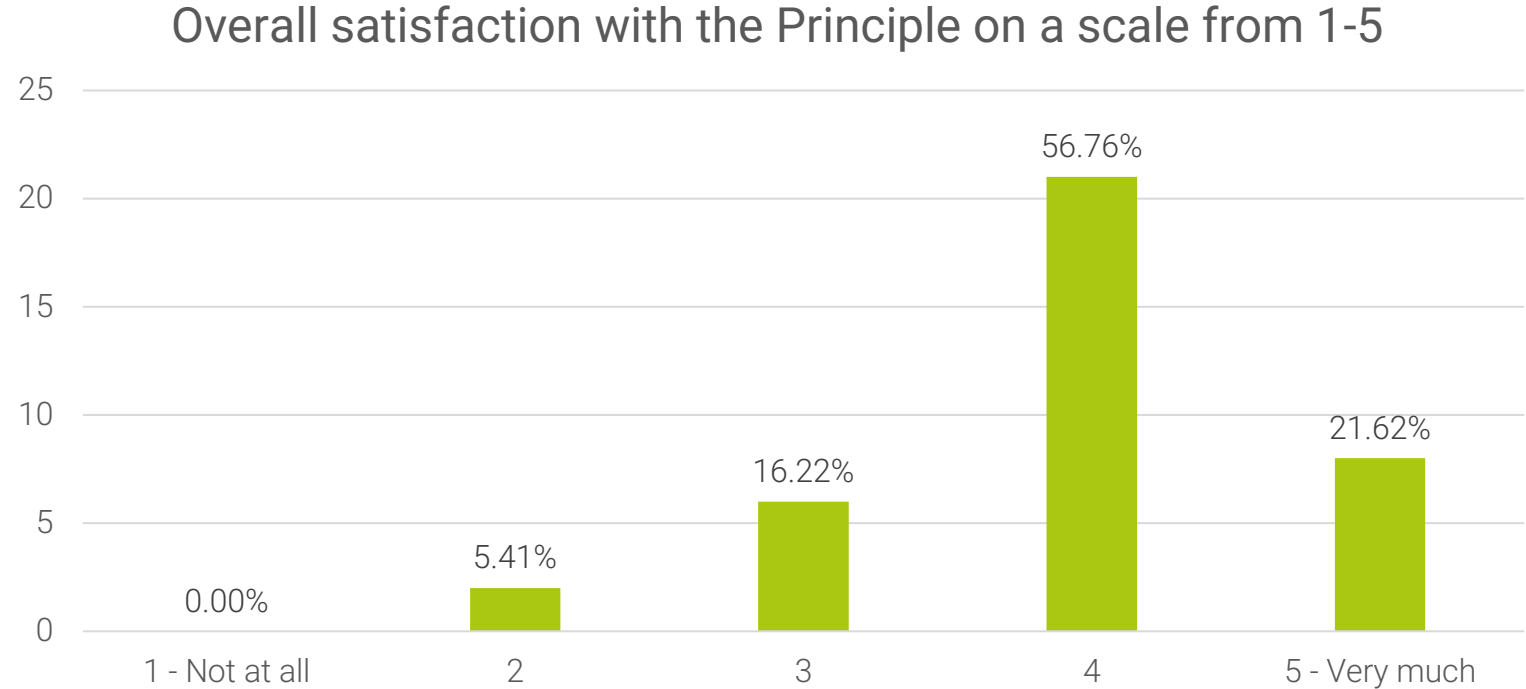
Principle 3: Crop Protection

Follow-up by Better Cotton

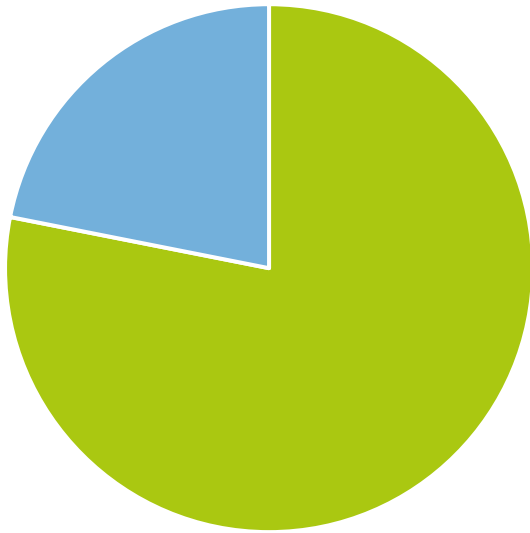
- 🌱 Key definitions can now be found in the P&C document, indicator guidance, and in the Glossary.
 - 🌱 **Better Cotton's approach to IPM** is outlined in a box under Principle 3, and further guidance will be provided.
 - 🌱 Reworded IPM indicators to specify intent (**discourage pest build-up**, as per FAO definition) (3.1.).
 - 🌱 **Seed varieties** indicator (3.1.3) has been reworded to focus on awareness and informed decisions, rather than selection itself.
 - 🌱 Reworded and included **pesticide mixtures** into the requirement around correctly registered and labelled pesticides (3.2.1).
 - 🌱 Guidance now clarifies that voluntary standards may have higher requirements than local regulation. In cases where viable alternatives do not exist, the **HHP Exceptional Use** process should be adopted (3.3).
 - 🌱 After extensive consultation, the 2028 **CMR phase out date** (indicator 3.3.2) has been confirmed. A delayed deadline is not believed to be a solution for key challenges. Instead, Better Cotton is committed to strengthening partnerships, capacity building, and advocacy.
 - 🌱 The indicator on prohibited pesticides (3.3.1) has been simplified. **Classifications systems** have been clarified in indicator guidance.
 - 🌱 Better Cotton agrees **PPE** is a key point, but out of direct scope of the P&C. Indicator is worded to remain flexible enough to allow even small improvements year over year (3.5.4). The issue will be flagged for capacity building and funding.
 - 🌱 The indicator on **disposal of pesticides containers (3.5.6)** has been adjusted. Its focus is on minimising risks and on participation in recycling programmes, where they exist; guidance recommends promoting or expanding recycling programmes where feasible.
-

Principle 4: Fibre Quality

Note: these are the results of the online survey only. They do not include data from country-level activities and targeted outreach.



37 out of 132 respondents to the online survey have rated this principle



Principle 4: Fibre Quality

Summary of Feedback

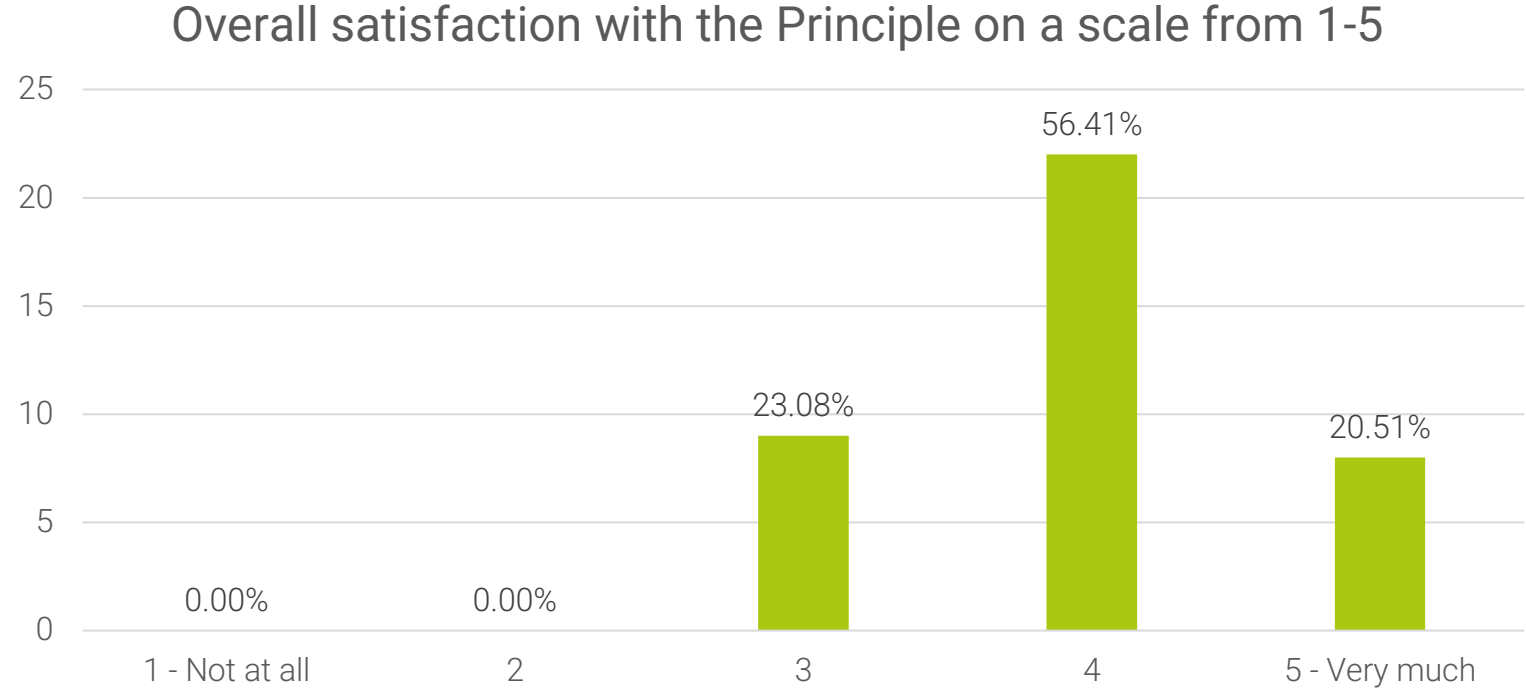
- 🌱 Some general comments around challenges to phase-out the use of **polypropylene, polyethylene or other synthetic bags**.
- 🌱 Some comments on the importance of **measuring fibre quality**.
- 🌱 Some comments on importance of **traceability**.

Follow-up by Better Cotton

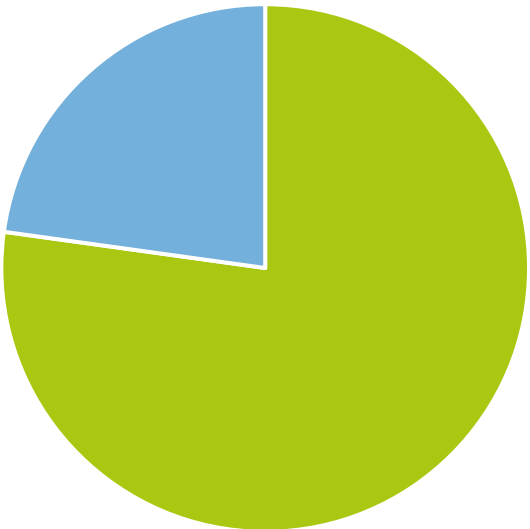
- 🌱 The mention of alternatives to **synthetic bags** has been moved into guidance for indicator 4.1.2, and therefore is no longer a standalone indicator.
- 🌱 **Measuring of fibre quality** has been removed as an indicator, but it will be discussed with the Monitoring & Evaluation function within Better Cotton.
- 🌱 **Traceability** is outside the scope of the P&C and will be addressed by the Better Cotton Traceability team.

Principle 5: Decent Work

Note: these are the results of the online survey only. They do not include data from country-level activities and targeted outreach.



39 out of 132 respondents to the online survey have rated this principle



Principle 5: Decent Work

Summary of Feedback

- 🌱 **Child labour:** Challenges in smallholder context around lack of ID and means for age verification.
- 🌱 **Minimum wages:** Feasibility challenges (esp. in India), as it will be difficult to measure minimum wages, especially for piecemeal and seasonal workers.
- 🌱 **Forced labour:** Some concerns raised about whether the P&C should cover additional indicators among ILO's Forced Labour Indicators.
- 🌱 **Access to sanitation** (toilets and handwashing): Numerous comments on feasibility challenges.
- 🌱 **Written contracts:** Strong pushback from stakeholders on the grounds of feasibility.

Principle 5: Decent Work

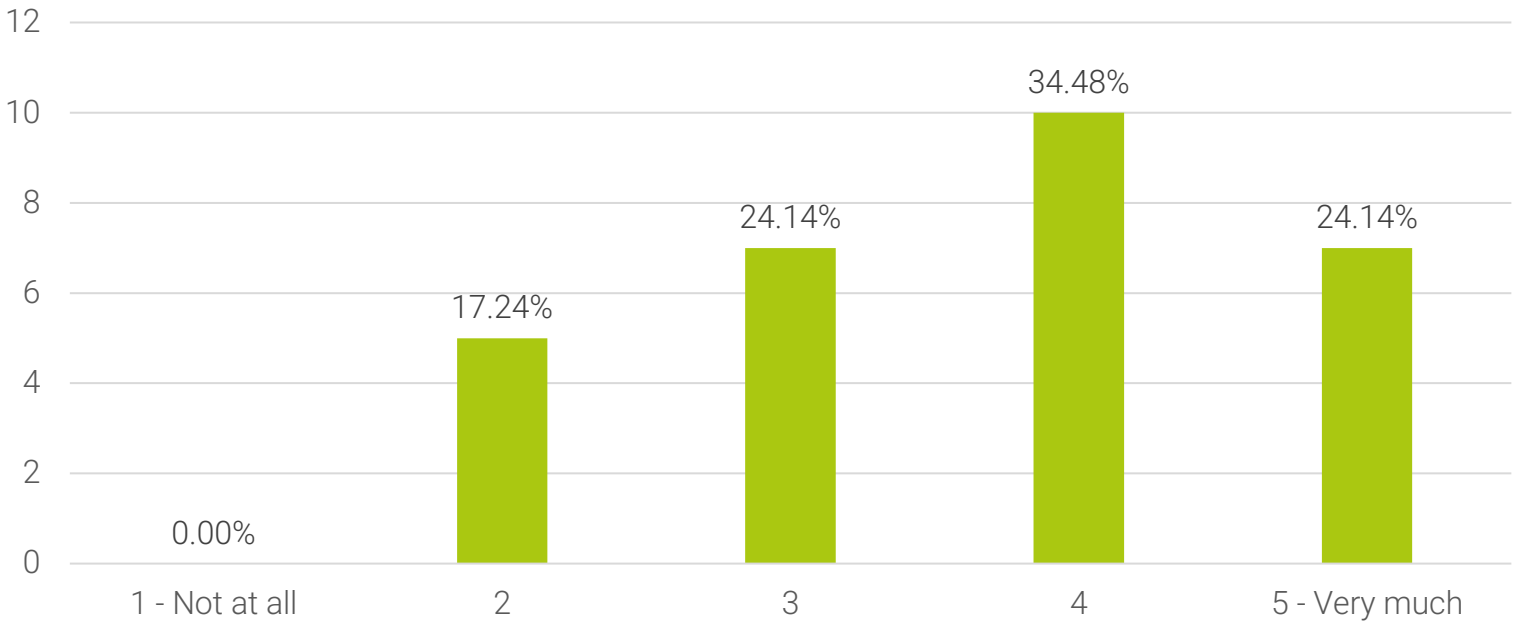
Follow-up by Better Cotton

- 🔄 Indicators on **child labour** have been adjusted and clarified (see criterion 5.3). Age verification has been removed as a key requirement.
- 🔄 Indicators on **minimum wages** have been adjusted. A new indicator applicable to smallholders (5.7.2) highlights the need to record average wages and improve them over time, in cases where minimum wages cannot be paid.
- 🔄 Clarification provided in a guidance box on the scope of **forced labour** indicators (see criterion 5.4).
- 🔄 Wording on **access to sanitation** (5.8.1) has been adjusted. The focus is now on providing time and privacy for personal sanitation, rather than on the infrastructure.
- 🔄 Indicator 5.10.1 has been modified, and it now requires to inform workers about their right to have a written contract, and to provide written contracts if requested.

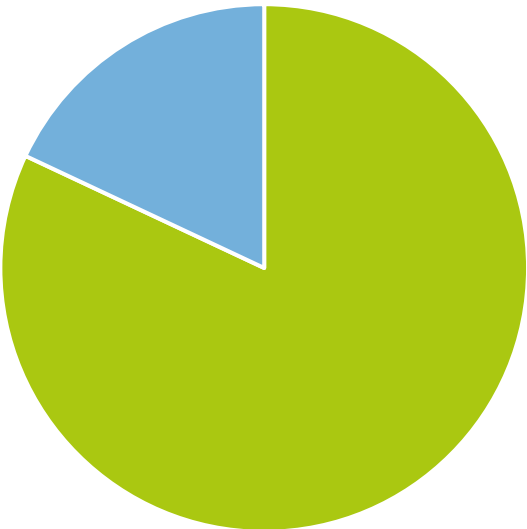
Principle 6: Livelihoods

Note: these are the results of the online survey only. They do not include data from country-level activities and targeted outreach.

Overall satisfaction with the Principle on a scale from 1-5



29 out of 132 respondents to the online survey have rated this principle



Principle 6: Livelihoods

Summary of Feedback

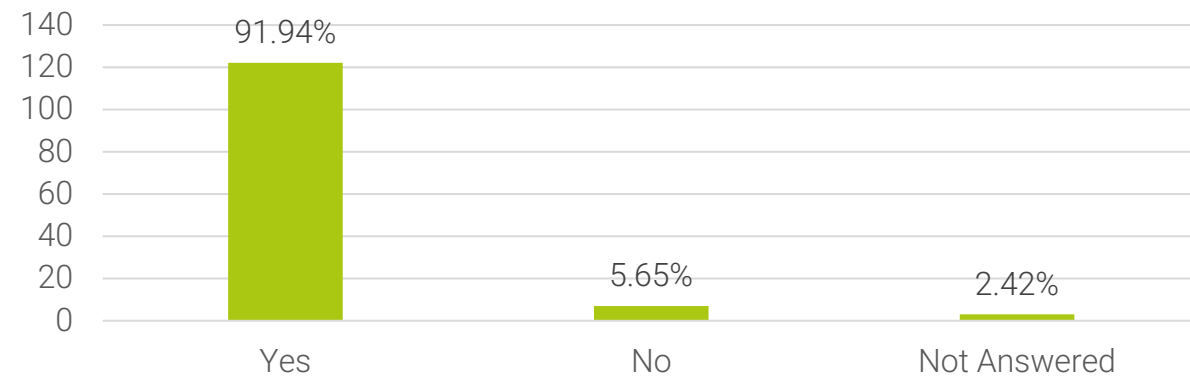
- 🌱 General acknowledgement of the **relevance** of Livelihoods to the P&C.
- 🌱 Many comments from Better Cotton Programme Partners on expected increase of **implementation costs** and increased **training needs**.
- 🌱 General agreement to keep the **options of measures and activities** very open and wide, but important to provide **guidance**.
- 🌱 Many comments on importance of **data and evidence** to define good livelihood measures.
- 🌱 Some comments on the **role of Large Farms** to enhance community wellbeing.

Follow-up by Better Cotton

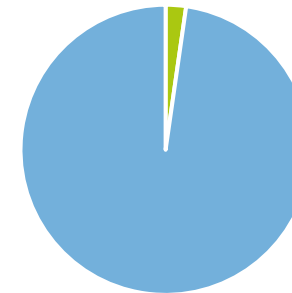
- 🌱 Global **guidance** and support for implementation will be provided to Programme Partners and producers, alongside general **activities** on this topic based on the Better Cotton 2030 Strategy.
- 🌱 **Cost implications** have been brought up to the Better Cotton Council for further consideration in coming years.
- 🌱 Please note that this Principle is now called 'Sustainable Livelihoods'.

Gender Equality

Does the revised standard successfully reflect the ambition to mainstream gender considerations?



129 out of 132 respondents to the online survey have rated our Gender approach in the P&C.*



*This question was on first page of survey, hence this much feedback if compared to other principles

- Comments focused on **specific issues**, many of which related to **Decent Work**, but did not suggest major changes in the way gender considerations are integrated in the P&C.
- Some comments touched upon challenges that are beyond the scope of the P&C and will be flagged internally as focus areas for specific projects.
- The introduction of a **Gender Lead or Committee (1.5)** was well received, but questions were raised on the level of responsibility. This has been clarified in indicator guidance.
- Better Cotton has further **strengthened the focus** on Gender Equality, by formally acknowledging it as a cross-cutting issue (like Climate Change), by marking indicators where women inclusion is particularly relevant, and by incorporating recommendations in indicator guidance across the P&C. Assurance materials will ensure that gender equality/inclusion will be checked in relevant indicators.





Guidance on the P&C

Guidance and other materials

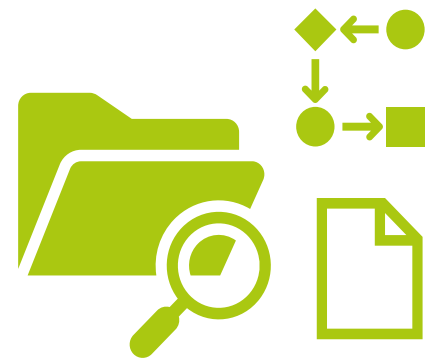
Principles & Criteria



Normative P&C document including global indicator guidance and glossary



Reference Documents



Additional global guidance, processes, and policies (i.e. Farm Data Requirement Document; HHP Exceptional Use Process; Guidance on Land Conversion; etc.)



Capacity Building materials



Locally adapted training materials



Assurance materials



Adapted assurance materials and checklists



Contacts
and more
information

Contacts

As per ISEAL recommendations, original comments submitted via the online survey will be made available upon request in an anonymised form.

Should you wish to receive the full list of comments or had any questions about the Revision process, please contact the Standards Team at: standards@bettercotton.org

For further updates on the P&C and other Better Cotton activities, sign up to our newsletter via our website and follow our social media channels.



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Thank you!