



**COTTON
MADE IN
AFRICA**



Cotton made in Africa

Chain of Custody
Guidelines

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Version Updates

The Cotton made in Africa (CmiA) Chain of Custody Guidelines are issued and maintained by the Aid by Trade Foundation and ATAKORA Fördergesellschaft GmbH. Readers should verify that they are using the latest copy of this and other relevant documents. All documentation is also available on the CmiA website (at <https://cottonmadeinafrica.org/en/> )



1 Introduction



1.1 Cotton made in Africa

→ **Cotton made in Africa**, an initiative of the Aid by Trade Foundation, is one of the world's leading standards for sustainably produced cotton. Its goal is to help people help themselves, via trade rather than donations, in order to improve the living and working conditions of smallholder farmers in Sub-Saharan Africa while protecting the environment. CmiA works with a wide-ranging network of partners in cotton-growing countries, including numerous ones throughout the textile value chain as well as both governmental and non-governmental organisations, to ensure the implementation of the standard and to support the proper processing of verified raw materials throughout the world. By maintaining licensing contracts with several international retail and brand partners, CmiA is helping increase the demand for CmiA-verified cotton.

→ **ATAKORA** is the trading company of the Aid by Trade Foundation and is responsible for the marketing and the supply chain management of the Cotton made in Africa brand. ATAKORA will be the contracting partner at each level of the supply chain.

1.2 CmiA Chain of Custody Guidelines

→ The CmiA Chain of Custody Guidelines establish the basic rules for CmiA's two implementation systems: **Hard Identity Preserved (HIP)** and **Mass Balance (MB)**.

1.3 Scope

→ The CmiA Chain of Custody (CoC) Guidelines defines the requirements for all supply chain organisations that buy or sell any CmiA product (e.g. cotton, yarns, fabrics, or garments/textiles).

Because different chain-of-custody requirements may apply to different types of supply chain organisations, these main chapters are divided into eight sections, one for each of the following: cotton traders, spinning mills, yarn trader/dye houses, fabric producers, fabric trader/dye houses, ready-made garment (RMG) producers, importers and retailers/brands.



2. Definition of Parties Involved

2.1 Terminology and Definitions

TERM	DEFINITION
Aid by Trade Foundation	Owner of the CmiA standards.
ATAKORA Fördergesellschaft GmbH	Trading company of the Aid by Trade Foundation that is responsible for the marketing and the supply chain management of CmiA.
CmiA cotton	Cotton produced by CmiA-verified cotton companies and their associated small-scale farmers.
CmiA Organic cotton	CmiA Organic must both meet the requirements of the CmiA Standard and a certification to the IFOAM Family of Standards for organic cotton cultivation at the farm level (e.g. EU Organic Regulation No 834/2007 or the USDA National Organic Program (NOP)).
CmiA product	<p>Any cotton or cotton-containing product (after the cotton trader level) that is bought or sold under a CmiA claim.</p> <p>Under the Mass Balance system (see section 4.2 21), this term may also refer to a product (yarn, fabric, garment/textile) that does not physically contain any CmiA cotton.</p>
CmiA Standard	The CmiA Standard covers the most significant sustainability aspects of cotton cultivation and ginning. The CmiA Standard applies to Managing Entities – usually cotton companies with one or more ginning facilities – operating in Sub-Saharan Africa with a direct link to small-scale farmers. A Managing Entity must be able to demonstrate its CmiA unit operates according to the requirements of the CmiA Standard.
CmiA cotton producer	Other term for a CmiA-verified cotton company that adheres to the CmiA Standard at field and ginnery levels.
CmiA-nominated cotton trader	CmiA-nominated cotton traders have signed a contract with ATAKORA that enables them to purchase CmiA cotton from CmiA-verified cotton companies and to sell the cotton under the “CmiA” label to a CmiA-registered spinning mill or a CmiA-nominated cotton trader.



TERM	DEFINITION
CmiA-registered spinning mill	CmiA-registered spinning mills have registered with CmiA to be allowed to purchase CmiA cotton, to process CmiA cotton, to label their yarns as CmiA, and to sell them to the next level of the supply chain. There are few requirements a spinning mill must meet to successfully register with CmiA.
CmiA-registered yarn trader/dye house	CmiA-registered yarn traders or yarn dye houses have registered with CmiA to be allowed to purchase and to sell CmiA-labelled yarns to the next level of the supply chain. There are few requirements a yarn trader/dye house must meet to successfully register with CmiA.
CmiA-registered fabric producer	CmiA-registered fabric producers have registered with CmiA to be allowed to purchase CmiA-labelled yarns, to produce CmiA-labelled fabric, and to sell it to the next level of the supply chain. There are few requirements a fabric producer must meet to successfully register with CmiA.
CmiA-registered fabric trader/dye house	CmiA-registered fabric traders or fabric dye houses have registered with CmiA to be allowed to purchase and to sell CmiA-labelled fabrics to the next level of the supply chain. There are few requirements a fabric trader/dye house must meet to successfully register with CmiA.
Ready-made garment (RMG) producer (i.e. supplier or manufacturer)	Ready-made garment producers, assigned by retailers or importers for CmiA productions, are not getting registered with CmiA but are only receiving access to CmiA's Tracking System. When producing CmiA garments or textiles for a CmiA license partner (retailer/brand) or its importers they are allowed to purchase CmiA-labelled yarns and fabrics and to carry out the final processes for the CmiA-labelled finished product.
Importer	Importers, assigned by retailers for CmiA orders, are not getting registered with CmiA but are only receiving access to CmiA's Tracking System. When selling CmiA garments or textiles to a CmiA license partner (retailer/brand) they are allowed to purchase CmiA-labelled finished products from ready-made garment producers.
Retailer	A person or business that sells goods to the public in relatively small quantities for use or consumption rather than for resale (business-to-consumer or B2C). In this context, the term brand meets the same definition. Retailer procuring and selling CmiA products (garments, textiles) have to have a valid CmiA license agreement with ATAKORA.
Code of Conduct	A Code of Conduct (PDF) ¹ is a set of rules outlining the norms and responsibilities or proper practices of an individual party or an organisation.
Conventional cotton	Refers to any cotton that was not produced by CmiA smallholder farmers. Conventional cotton can include organic cotton or cotton certified under other sustainability standards.
Hard Identity Preserved system (HIP)	The Hard Identity Preserved system (HIP) is a content claim. Within this system, it is not allowed to mix CmiA cotton with conventional cotton at any stage of production. A Tracking System provides complete transparency and traceability throughout the entire value chain (see section 4.1 (PDF)).

¹ <https://cottonmadeinafrica.org/en/for-retailers-and-brands/#downloads>



TERM	DEFINITION
Mass Balance system (MB)	At the spinning mill level, CmiA cotton may be substituted or blended with cotton of other origins, as long as the balance between purchased CmiA cotton and yarns sold as CmiA is maintained. This is verified through quantity checks and a Tracking System that ensures that the amount of purchased CmiA cotton corresponds to the amount of CmiA-labelled yarns (see section 4.2  .
Sustainable Cotton Tracker (SCOT)	CmiA Tracking System used by all members of the CmiA supply chain who are trading or producing CmiA cotton, CmiA-labelled yarns, CmiA-labelled fabrics or CmiA-labelled products. All sales and purchases for Mass Balance or HIP productions must be reported to the system in respective sections.

2.2 SCOT Helpdesk

→ Cotton made in Africa has nominated a service company to deliver support services for the CmiA registration and the Sustainable Cotton Tracker (SCOT) system to all parties in the CmiA supply chain.

For further details on the SCOT helpdesk, please refer to the SCOT User Manual.

Please reach out to the SCOT helpdesk for the following issues:

- Help with new registration and re-registration with CmiA and in the SCOT system
- Password renewal
- Creating SCOT user accounts
- Questions related to data upload/input, purchase and sales transactions





3 CmiA Registration Requirements and Basic Rules

3.1 Overview

→ All organisations handling and/or sourcing CmiA cotton or CmiA-labelled products are required to maintain a partnership with CmiA (please see table below for the applicable form of partnership).

SUPPLY CHAIN LEVEL	FORM OF PARTNERSHIP WITH CMI A
Cotton trader	Partnership contract
Spinning mill	CmiA registration
Yarn trader/dye house	CmiA registration
Fabric producer	CmiA registration
Fabric trader/dye house	CmiA registration
Ready-made garment producer	CmiA registration not required, only SCOT account
Importer	CmiA registration not required, only SCOT account
Retailer	Licensing contract

More information about all registration processes can be found on the CmiA website:

 cottonmadeinafrica.org/en/



3.2 Cotton Trader



3.2.1 Partnership Contract Options

Cotton traders can choose between two different partnership options: a regular partnership or a strategic partnership.

→ Regular Partnership

Cotton traders sign a contract with ATAKORA Fördergesellschaft GmbH to trade CmiA cotton under the following labels:

- CmiA cotton
- CmiA Organic cotton

→ Strategic Partnership

In addition to the requirements described for the regular partnership, cotton traders desiring a strategic partnership must agree to fulfil the following requirements:

- Sponsoring potential CmiA workshops: CmiA conducts workshops in several supply chain-relevant production countries and teams up with cotton traders to train the supply chain partners in implementing CmiA.
- Supporting CmiA staff during travel to supply chain-relevant production countries, both directly (e.g. in person) and/or indirectly (e.g. by sharing their network).
- Providing cotton-relevant and country-specific information, e.g. about quality and about availability to CmiA.

→ Under their partnership contracts, all CmiA-nominated cotton traders (both regular and strategic ones) further agree to fulfil the basic requirements laid down below (see section 3.2.2–3.2.6 .



3.2.2 Administrative Set-Up

→ Each cotton trader must appoint one or more designated representatives who are responsible for ensuring compliance with the relevant Cotton made in Africa chain-of-custody requirements and for recording relevant data in the Sustainable Cotton Tracker (SCOT) system.

Cotton traders must confirm that the persons responsible for using SCOT, for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required records are trained and competent to fulfil relevant chain-of-custody requirements.

3.2.3 Purchase of CmiA Cotton

→ CmiA-nominated cotton traders must purchase CmiA cotton only from CmiA-verified cotton producers or other CmiA-nominated cotton traders. Updates on the status of CmiA-verified cotton producers [🔗 \(PDF\)²](#) or other CmiA-nominated cotton traders [🔗 \(PDF\)³](#) must be regularly checked.

For future purchases and sales after the verified harvest season, ATAORA does not guarantee the validity of CmiA verification.

Cotton traders must accurately document their process for procuring CmiA cotton and the flow of CmiA cotton from the verified cotton producers or CmiA-nominated cotton traders (including the role of middlemen, transport, etc.). They must retain all documents and records related to the purchase, handling, and sale of CmiA cotton for a minimum period of two years. Evidentiary documentation for CmiA cotton purchases must always specifically state “CmiA” cotton. If CmiA cotton is purchased from another CmiA-nominated cotton trader, it must be ensured that it is CmiA cotton from a CmiA-verified cotton producer.

3.2.4 Sale of CmiA Cotton

→ Cotton traders are only allowed to sell cotton as “CmiA” or “CmiA Organic” originating from a respective CmiA-verified cotton producer [🔗 \(PDF\)²](#).

All sales documents (contract, invoice, shipment documents) of CmiA cotton to CmiA-registered spinning mills must clearly state “CmiA” or “CmiA Organic” cotton on the document. Traders can also sell CmiA cotton to other CmiA-nominated cotton traders.

3.2.5 Data Entry in SCOT

→ Cotton traders must enter all CmiA cotton purchases and all CmiA cotton sales into SCOT within 30 calendar days of the contract date.

Sales to CmiA-registered spinning mills must be acknowledged by the spinning mill in the SCOT system. CmiA sales to other CmiA-nominated cotton traders will not be transferred in the SCOT system and must therefore not be acknowledged.

Cotton traders must ensure that all data entered into SCOT is accurate and can be verified against corresponding documentation (e.g. contracts, invoices, and order sheets). For all purchase transactions, the following information is relevant: cotton origin (cotton producer), name of seller (cotton producer or trader), contract number, contract date, volume and crop season. Sales transactions, whether to CmiA spinning mills or to other CmiA cotton traders, must include: name of buyer (spinning mill or cotton trader), cotton origin (cotton producer), contract number, contract date, expected shipment date, volume and crop season.

Detailed information about the usage of SCOT and the data input can be found in the SCOT User Manual.

3.2.6 Monitoring/Sanctions

→ If a cotton trader cannot verify his purchases or sales of CmiA cotton, or if there is evidence of fraudulent use of SCOT, Cotton made in Africa reserves the right to reduce or cancel the cotton trader’s CmiA cotton account inventory, up to the total volume of unverified or fraudulent claims, or even to terminate the contract as a sanction of last resort.

² <https://cottonmadeinafrica.org/wp-content/uploads/CmiA-Cotton-Companies.pdf>

³ <https://cottonmadeinafrica.org/wp-content/uploads/Cotton-Trader-CmiA.pdf>



3.3 Spinning Mill



3.3.1 Registration Requirements

→ Spinning mills must fulfil the following requirements in order to successfully receive a CmiA registration that is valid for one year:

- Purchase CmiA cotton [\(PDF\)](#)² from a CmiA-nominated cotton trader [\(PDF\)](#)³. Purchases of CmiA cotton will only be accepted if they were completed less than one year before the date of the registration application.
- Accept the Cotton made in Africa Code of Conduct [\(PDF\)](#)¹ and the Cotton made in Africa Chain of Custody Guidelines.
- Provide company-relevant information (e.g. product details or wastage factor).
- Pay the annual registration fee.
- Appoint one or more designated representatives who are responsible for ensuring compliance with the relevant Cotton made in Africa chain-of-custody requirements and for recording relevant data in the Sustainable Cotton Tracker (SCOT) system.
- Confirm that the persons responsible for using SCOT, for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required records are trained and competent to fulfil relevant chain-of-custody requirements.

3.3.2 Application for CmiA HIP

→ Spinning mills planning to do CmiA HIP yarn productions must fulfill specific requirements (see section 4.1 [\(PDF\)](#)) and hand in additional documentation first before they are allowed to produce and sell CmiA HIP yarns (see CmiA HIP implementation document [\(PDF\)](#)⁴)

3.3.3 Purchase of CmiA Cotton

→ CmiA-registered spinning mills must purchase CmiA-verified cotton [\(PDF\)](#)² from CmiA-nominated cotton traders [\(PDF\)](#)³. Updates on the status of CmiA-verified cotton producers and CmiA-nominated cotton traders must be regularly checked.

Spinning mills must accurately document their process for procuring CmiA cotton and the flow of CmiA cotton from the cotton trader (including the role of middlemen). They must retain all documents and records related to the purchase, handling, and sale of CmiA cotton and CmiA-labelled yarns for a minimum period of two years.

Evidentiary documentation for CmiA cotton purchases always must specifically state “CmiA” or “CmiA Organic” cotton.

1 <https://cottonmadeinafrica.org/en/for-retailers-and-brands/#downloads>

2 <https://cottonmadeinafrica.org/wp-content/uploads/CmiA-Cotton-Companies.pdf>

3 <https://cottonmadeinafrica.org/wp-content/uploads/Cotton-Trader-CmiA.pdf>

4 https://cottonmadeinafrica.org/wp-content/uploads/CmiA_HIP_Implementation.pdf



3.3.4 Sale of CmiA-Labelled Yarns

→ Spinning mills must first purchase CmiA cotton before being allowed to sell CmiA-labelled yarns.

Spinning mills should make sure with their buyer if CmiA MB yarns or CmiA HIP yarns are requested and that sales transactions are entered correctly into MB or HIP section in SCOT.

All sales documents (contract, invoice, shipment documents) for CmiA-labelled yarns must state - according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) - clearly “CmiA MB yarn” or “CmiA HIP yarn”.

Only HIP approved spinning mills (see section 3.3.2 [a](#)) and 4.1 [a](#)) are allowed to sell CmiA HIP yarns.

3.3.5 Data Entry in SCOT

→ Spinning mills must enter all CmiA yarn sales transactions into SCOT within 30 calendar days of the contract date. CmiA MB yarn sales must be entered into MB section in SCOT, CmiA HIP yarn sales in respective HIP section.

CmiA cotton purchases by CmiA-registered spinning mills must be reported into SCOT by the cotton traders and will be displayed in spinning mill's SCOT MB account. For purchases of CmiA cotton to be included in their cotton balance, spinning mills must acknowledge each purchase in their SCOT account.

Spinning mills must ensure that all data entered into SCOT is accurate and can be verified against corresponding documentation (e.g. purchase receipt, invoice, and production records).

Detailed information about the usage of SCOT and data input can be found in the SCOT User Manual.

3.3.6 Monitoring/Sanctions

→ If a spinning mill cannot verify its purchases of CmiA cotton or sales of CmiA-labelled yarns, or if there is evidence of fraudulent use of SCOT, Cotton made in Africa reserves the right to reduce or cancel the spinning mill's CmiA cotton account inventory, up to the total volume of unverified or fraudulent claims, as a first step or even to terminate the registration as a sanction of last resort. Without a valid CmiA registration a spinning mill is no longer allowed to produce or sell CmiA-labelled yarns.





3.4 Yarn Trader/Dye House



3.4.1 Registration Requirements

→ Yarn traders/dye houses must fulfil the following registration requirements in order to successfully receive a CmiA registration that is valid for one year:

- Accept the Cotton made in Africa Code of Conduct [\(PDF\)](#)¹ and the Cotton made in Africa Chain of Custody Guidelines.
- Provide company-relevant information (e.g. product details).
- Pay the annual registration fee.
- Appoint one or more designated representatives who are responsible for ensuring compliance with the relevant Cotton made in Africa chain-of-custody requirements and for recording relevant data in the Sustainable Cotton Tracker (SCOT) system.
- Confirm that the persons responsible for using SCOT, for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required records are trained and competent to fulfil relevant chain-of-custody requirements.

3.4.2 Purchase of CmiA-Labelled Yarns

→ CmiA-registered yarn traders/dye houses must purchase CmiA-labelled yarns only from CmiA-registered spinning mills. Updates on the status of CmiA-registered spinning mills must be regularly checked [\(xlsx\)](#)⁵.

Yarn trader/dye houses should make sure with their seller if CmiA MB yarns or CmiA HIP yarns are purchased and that purchase transactions are entered correctly into MB or HIP section in SCOT.

Yarn traders/dye houses must accurately document their process for procuring CmiA-labelled yarns. They must retain all documents and records related to the purchase, handling, and sale of CmiA-labelled yarns for a minimum period of two years. Evidentiary documentation for purchases of CmiA-labelled yarn must always specifically state – according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) – clearly “CmiA MB yarn” or “CmiA HIP yarn”.

¹ <https://cottonmadeinafrica.org/en/for-retailers-and-brands/#downloads>

⁵ <https://cottonmadeinafrica.org/wp-content/uploads/Spinning-Mills-Fabric-Producers-CmiA.xlsx>



3.4.3 Sale of CmiA-Labelled Yarns

→ Yarn traders/dye houses must first purchase CmiA-labelled yarns before being allowed to sell CmiA-labelled yarns.

Yarn traders/dye houses should make sure with their buyer if CmiA MB yarns or CmiA HIP yarns are requested and that sales transactions are entered correctly into MB or HIP section in SCOT.

All sales documents (contract, invoice, shipment documents) for CmiA-labelled yarns must state – according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) – “CmiA MB yarn” or “CmiA HIP yarn”.

3.4.4 Data Entry in SCOT

→ Yarn traders/dye houses must enter all CmiA yarn sales transactions into SCOT within 30 calendar days of the contract date. CmiA MB yarn sales must be entered into MB section in SCOT, CmiA HIP yarn sales in respective HIP section. For purchases of CmiA-labelled yarn to be included in their yarn balance, the purchase needs to be entered by the CmiA-registered spinning mill and yarn traders/dye houses must acknowledge each purchase in their SCOT account.

Yarn traders/dye houses must ensure that all data entered into SCOT is accurate and can be verified against corresponding documentation (e.g. purchase receipt, invoice, and production records).

Detailed information about the usage and data input into SCOT can be found in the SCOT User Manual.

3.4.5 Monitoring/Sanctions

→ If a yarn trader/dye house cannot verify its purchases of CmiA-labelled yarns or sales of CmiA-labelled yarns, or if there is evidence of fraudulent use of SCOT, Cotton made in Africa reserves the right to reduce or cancel the yarn trader's/dye house's yarn account inventory, up to the total volume of unverified or fraudulent claims, as a first step or even to terminate the registration as a sanction of last resort. Without a valid CmiA registration, a yarn trader/dye house is no longer allowed to trade/dye or sell CmiA-labelled yarns.





3.5 Fabric Producer



3.5.1 Registration Requirements

→ Fabric producers must fulfil the following registration requirements in order to successfully receive a CmiA registration that is valid for one year:

- Accept the Cotton made in Africa Code of Conduct [📄 \(PDF\)](#)¹ and the Cotton made in Africa Chain of Custody Guidelines.
- Provide company-relevant information (e.g. product details).
- Pay the annual registration fee.
- Appoint one or more designated representatives who are responsible for ensuring compliance with the relevant Cotton made in Africa chain-of-custody requirements and for recording relevant data in the Sustainable Cotton Tracker (SCOT) system.
- Confirm that the persons responsible for using SCOT, for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required records are trained and competent to fulfil relevant chain-of-custody requirements.

3.5.2 Purchase of CmiA-Labelled Yarns

→ CmiA-registered fabric producers must purchase CmiA-labelled yarns only from CmiA-registered spinning mills or CmiA-registered yarn traders/dye houses. Updates on the status of CmiA-registered companies must be regularly checked [📄 \(xlsx\)](#)⁵.

Fabric producers should make sure with their seller if CmiA MB yarns or CmiA HIP yarns are purchased and that purchase transactions are entered correctly into MB or HIP section in SCOT.

Fabric producers must accurately document their process for procuring CmiA-labelled yarns. They must retain all documents and records related to the purchase, handling, and sale of CmiA-labelled yarns and CmiA-labelled fabrics for a minimum period of two years.

Evidentiary documentation for purchases of CmiA-labelled yarn must always specifically state – according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) – clearly “CmiA MB yarn” or “CmiA HIP yarn”.

¹ <https://cottonmadeinafrica.org/en/for-retailers-and-brands/#downloads>

⁵ <https://cottonmadeinafrica.org/wp-content/uploads/Spinning-Mills-Fabric-Producers-CmiA.xlsx>



3.5.3 Sale of CmiA-Labelled Fabrics

→ Fabric producers must first purchase CmiA-labelled yarns before being allowed to sell CmiA-labelled fabrics. Fabric producers should make sure with their buyer if CmiA MB fabrics or CmiA HIP fabrics are requested and that sales transactions are entered correctly into MB or HIP section in SCOT.

All sales documents (contract, invoice, shipment documents) for CmiA-labelled fabrics must state – according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) – “CmiA MB fabric” or “CmiA HIP fabric”.

3.5.4 Data Entry in SCOT

→ Fabric producers must enter all CmiA fabric sales transactions into SCOT within 30 calendar days of the contract date. CmiA MB fabric sales must be entered into MB section in SCOT, CmiA HIP fabric sales in respective HIP section. For purchases of CmiA-labelled yarn to be included in their yarn balance, the purchase needs to be entered by the CmiA-registered spinning mill or yarn trader/dye house, and fabric producers must acknowledge each purchase in their SCOT account.

Fabric producers must ensure that all data entered into SCOT is accurate and can be verified against corresponding documentation (e.g. purchase receipt, invoice, and production records).

Detailed information about the usage of SCOT and data input can be found in the SCOT User Manual.

3.5.5 Monitoring/Sanctions

→ If a fabric producer cannot verify its purchases of CmiA-labelled yarns or its sales of CmiA-labelled fabrics, or if there is evidence of fraudulent use of SCOT, Cotton made in Africa reserves the right to reduce or cancel the fabric producer’s yarn account inventory, up to the total volume of unverified or fraudulent claims, or even to terminate the registration as a sanction of last resort. The fabric producer is then no longer allowed to produce or sell CmiA-labelled fabrics.





3.6 Fabric Trader/Dye House

3.6.1 Registration Requirements

→ Fabric traders/dye houses must fulfil the following registration requirements in order to successfully receive a CmiA registration that is valid for one year:

- Accept the Cotton made in Africa Code of Conduct [\(PDF\)](#)¹ and the Cotton made in Africa Chain of Custody Guidelines.
- Provide company-relevant information (e.g. product details).
- Pay the annual registration fee.
- Appoint one or more designated representatives who are responsible for ensuring compliance with the relevant Cotton made in Africa chain-of-custody requirements and for recording relevant data in the Sustainable Cotton Tracker (SCOT) system.
- Confirm that the persons responsible for using SCOT, for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required records are trained and competent to fulfil relevant chain-of-custody requirements.

3.6.2 Purchase of CmiA-Labelled Fabrics

→ Fabric traders/dye houses must purchase CmiA-labelled fabrics only from CmiA-registered fabric producers. Updates on the status of CmiA-registered fabric producers must be regularly checked [\(xlsx\)](#)⁵.

Fabric traders/dye houses should make sure with their seller if CmiA MB fabrics or CmiA HIP fabrics are purchased and that purchase transactions are entered correctly into MB or HIP section in SCOT.

Fabric traders/dye houses must accurately document their process for procuring CmiA-labelled fabrics, retaining all documents and records related to the purchase, handling, and sale of CmiA-labelled fabrics for a minimum period of two years.

Evidentiary documentation for purchases of CmiA-labelled fabric must always specifically state – according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) – clearly “CmiA MB fabric” or “CmiA HIP fabric”.

3.6.3 Sale of CmiA-Labelled Fabrics

→ Fabric traders/dye houses must first purchase CmiA-labelled fabrics before being allowed to sell CmiA-labelled fabrics. Fabric traders/dye houses should make sure with their buyer if CmiA MB fabrics or CmiA HIP fabrics are requested and that sales transactions are entered correctly into MB or HIP section in SCOT.

All sales documents (contract, invoice, shipment documents) for CmiA-labelled fabrics must state – according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) – “CmiA MB fabric” or “CmiA HIP fabric”.

3.6.4 Data Entry in SCOT

→ Fabric traders/dye houses must enter all CmiA fabric sales into SCOT within 30 calendar days of the contract date. CmiA MB fabric sales must be entered into MB section in SCOT, CmiA HIP fabric sales in respective HIP section.

For purchases of CmiA-labelled fabrics to be included in their fabric balance, the purchase needs to be entered by the CmiA-registered fabric producer, and fabric traders/dye houses must acknowledge each purchase in their SCOT account.

Fabric traders/dye houses must ensure that all data entered into SCOT is accurate and can be verified against corresponding documentation (e.g. purchase receipt, invoice, and production records).

Detailed information about the usage of SCOT and data input can be found in the SCOT User Manual.

3.6.5 Monitoring/Sanctions

→ If a fabric trader/dye house cannot verify its purchases of CmiA-labelled fabrics or its sales of CmiA-labelled fabrics, or if there is evidence of fraudulent use of SCOT, Cotton made in Africa reserves the right to reduce or cancel the fabric trader's/dye house's fabric account inventory, up to the total volume of unverified or fraudulent claims, or even to terminate the registration as a sanction of last resort. The fabric trader/dye house is then no longer allowed to produce or sell CmiA-labelled fabrics.

¹ <https://cottonmadeinafrica.org/en/for-retailers-and-brands/#downloads>

⁵ <https://cottonmadeinafrica.org/wp-content/uploads/Spinning-Mills-Fabric-Producers-CmiA.xlsx>



3.7 Ready-Made Garment (RMG) Producer

3.7.1 Requirements

→ Ready-made garment (RMG) producers must fulfil the following requirements in order to receive a CmiA SCOT account and fulfill CmiA orders:

- Accept the Cotton made in Africa Code of Conduct [📄 \(PDF\)](#)¹ and the Cotton made in Africa Chain of Custody Guidelines.
- Provide company-relevant information (e.g. product details).
- Appoint one or more designated representatives who are responsible for ensuring compliance with the relevant Cotton made in Africa chain-of-custody requirements and for recording relevant data in the Sustainable Cotton Tracker (SCOT) system.
- Confirm that the persons responsible for using SCOT, for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required records are trained and competent to fulfil relevant chain-of-custody requirements.

3.7.2 Purchase of CmiA-Labelled Yarns/Fabrics

→ Ready-made garment producers must purchase CmiA-labelled yarns or fabrics only from CmiA-registered spinning mills, yarn traders/dye houses, fabric producers or fabric traders/dye houses. Updates on the status of CmiA-registered companies must be regularly checked [📄 \(xlsx\)](#)⁵.

Ready-made garment producers should make sure with their seller if CmiA MB yarns/fabrics or CmiA HIP yarns/fabrics are purchased and that purchase transactions are entered correctly into MB or HIP section in SCOT.

Ready-made garment producers must accurately document their process for procuring CmiA-labelled yarns or CmiA-labelled fabrics, retaining all documents and records related to the purchase, handling, and sale of CmiA-labelled yarns/fabrics and final products for a minimum period of two years.

Evidentiary documentation for purchases of CmiA-labelled yarns/fabrics must always specifically state - according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) - clearly “CmiA MB yarn/fabric” or “CmiA HIP yarn/fabric”.

3.7.3 Sale of CmiA-Labelled Products (Garments/Textiles)

→ Ready-made garment producers must first purchase CmiA-labelled yarns or CmiA-labelled fabrics before being allowed to sell CmiA-labelled products. All sales documents (contract, invoice, shipment documents) for CmiA-labelled products to be sold to CmiA licensing partners (retailers) or their importers must state - according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) - “CmiA MB” or “CmiA HIP”.

3.7.4 Data Entry in SCOT

→ Latest on product shipment date ready-made garment producers must provide information about how they fulfilled/covered/produced the CmiA products for their CmiA licensing partners (retailers) or the respective importers. CmiA MB orders by retailers or importers are displayed in MB section in SCOT, CmiA HIP orders in respective HIP section.

For purchases of CmiA-labelled yarns/fabrics to be included in their yarn/fabric balance, the purchase needs to be entered by the CmiA-registered spinning mill, yarn trader/dye house, fabric producer or fabric trader/dye house, and ready-made garment producers must acknowledge each purchase in their SCOT account. Ready-made garment producers must ensure that all data entered into SCOT is accurate and can be verified against corresponding documentation (e.g. purchase receipt, invoice, and production records).

Detailed information about the usage of SCOT and data input can be found in the SCOT User Manual.

3.7.5 Monitoring/Sanctions

→ If a ready-made garment producer cannot verify its purchases of CmiA-labelled yarns or fabrics or its sales of CmiA-labelled final products, or if there is evidence of fraudulent use of SCOT, Cotton made in Africa reserves the right to reduce or cancel the ready-made garment producer’s CmiA yarn or fabric account inventory, up to the total volume of unverified or fraudulent claims, or even to terminate the SCOT account as a sanction of last resort. The ready-made garment producer is then no longer allowed to produce or sell CmiA-labelled products.

1 <https://cottonmadeinafrica.org/en/for-retailers-and-brands/#downloads>

5 <https://cottonmadeinafrica.org/wp-content/uploads/Spinning-Mills-Fabric-Producers-CmiA.xlsx>



3.8 Importer

3.8.1 Requirements

→ Importers must fulfil the following requirements in order to receive a CmiA SCOT account and fulfill CmiA orders:

- Accept the Cotton made in Africa Code of Conduct [📄 \(PDF\)](#)¹ and the Cotton made in Africa Chain of Custody Guidelines.
- Provide company-relevant information (e.g. product details).
- Appoint one or more designated representatives who are responsible for ensuring compliance with the relevant Cotton made in Africa chain-of-custody requirements and for recording relevant data in the Sustainable Cotton Tracker (SCOT) system.
- Confirm that the persons responsible for using SCOT for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required records are trained and competent to fulfil relevant chain-of-custody requirements.

3.8.2 Purchase of CmiA-Labelled Products (Garments/Textiles)

→ Importers must purchase CmiA-labelled products only from ready-made garment producers which comply with the respective CmiA implementation requirements (see above 3.7 [📄](#)), are therefore able to deliver CmiA MB or CmiA HIP products and have a CmiA SCOT account. Importers should make sure with their seller if CmiA MB products or CmiA HIP products are purchased and that purchase transactions are entered correctly into MB or HIP section in SCOT.

Importers must accurately document their process for procuring CmiA-labelled products. They must retain all documents regarding CmiA-labelled final products for a minimum period of two years.

Evidentiary documents for CmiA-labelled products must always specifically state – according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) – clearly “CmiA MB” or “CmiA HIP”.

3.8.3 Sale of CmiA-Labelled Products

→ All sales documents (contract, invoice, shipment documents) for CmiA-labelled products to be sold to CmiA licensing partners (retailers) must state – according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) – „CmiA MB“ or „CmiA HIP“.

3.8.4 Data Entry in SCOT

→ Importers are receiving CmiA order data from CmiA licensing partners (retailers) in their SCOT account. CmiA MB orders by retailers are displayed in MB section in SCOT, CmiA HIP orders in respective HIP section. Subsequently importers must select from which ready-made garment producer they will purchase the product and forward the relevant order data to ready-made garment producer’s SCOT account.

Latest on product shipment date the order data must be fulfilled, meaning that the ready-made garment producer must have provided information about how they fulfilled/covered/produced the CmiA products delivered to the importer.

Importers must ensure that all data entered into SCOT is accurate and can be verified against corresponding documentation (e.g. purchase receipt and invoice).

Detailed information about the usage of SCOT and data input can be found in the SCOT User Manual.

3.8.5 Monitoring/Sanction

→ If an importer cannot verify its purchases of CmiA-labelled products or its sales of CmiA-labelled products, or if there is evidence of fraudulent use of SCOT, Cotton made in Africa reserves the right to terminate the SCOT account as a sanction of last resort. The importer is then no longer allowed to trade CmiA-labelled products.

¹ <https://cottonmadeinafrica.org/en/for-retailers-and-brands/#downloads>



3.9 Retailer



3.9.1 Licensing Contract Requirements

→ Retailers must sign a licensing agreement with ATAKORA Fördergesellschaft GmbH. This enables the partner to incorporate the CmiA cotton into its supply chain and to use the CmiA logo and CmiA label for product communication and corporate communication in accordance with the CmiA Claims Framework (see section 5 [↗](#)).

3.9.2 Selection of Implementation System: Hard Identity Preserved (HIP) or Mass Balance (MB)

→ Retailers can choose between two CmiA cotton implementation systems, each of which precisely defines the degree of transparency and integration of CmiA cotton within the supply chain. A retailer can select either one system or both at the same time.

- Hard Identity Preserved (HIP): Provides the highest level of transparency and traceability and permits content claims (see section 4.1 [↗](#)).
- Mass Balance (MB): Focusses on increasing the demand for CmiA cotton; it does not permit content claims (see section 4.2 [↗](#)).

Retailers are responsible to have their supply chain informed if CmiA products are required according to the Mass Balance or according to the HIP system and that the respective importers and/or ready-made garment producers are familiar with the respective implementation requirements.

3.9.3 Administrative Set-Up

→ Retailers must appoint one or more designated representatives who are responsible for ensuring compliance with the relevant Cotton made in Africa chain-of-custody requirements.

Retailers must confirm that the persons responsible for using SCOT (e.g. employees of sourcing offices), for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required order data are trained and competent to fulfil relevant chain-of-custody requirements.



3.9.4 Purchase of CmiA-Labelled Products

→ Retailers must purchase CmiA-labelled products only from ready-made garment producers or importers which comply with the respective CmiA implementation requirements (see above 3.7 [a](#) and 3.8 [a](#)), are therefore able to deliver CmiA MB or CmiA HIP products and have a CmiA SCOT account.

Retailers should make sure with their seller if CmiA MB products or CmiA HIP products are purchased and that respective CmiA order data are uploaded correctly into MB or HIP section in SCOT.

Retailers must accurately document their process for procuring CmiA products. They must retain all documents regarding CmiA-labelled final products for a minimum period of two years.

Evidentiary documents for CmiA products must always specifically state – according to the used implementation system Mass Balance (MB) or Hard Identity Preserved (HIP) – clearly “CmiA MB” or “CmiA HIP”. Retailers must ensure that all partners throughout their supply chain are properly informed about the chosen CmiA implementation system and its application.

3.9.5 Data Entry in SCOT

→ Retailers must regularly provide their order information for CmiA products to the SCOT system. Relevant order information include: order number, importer/supplier name and country, article description, article number, quantity, composition, and planned delivery date. Order data must be provided separately for MB or HIP orders.

Before uploading any CmiA orders into SCOT, the persons responsible must provide Cotton made in Africa with the relevant information about importer or ready-made garment producer where CmiA orders are placed. For each company an account must be created in SCOT. Further information can be found in the SCOT User Manual.

Retailers must ensure that all data provided for SCOT is accurate and can be verified against corresponding documentation (i.e. purchase receipt, invoice, and production records).



4 CmiA Implementation Systems



→ CmiA offers, depending on the different expectations for transparency and traceability, two different systems on how to implement CmiA-verified cotton into a retailer's supply chain.

Whereas the Hard Identity Preserved (HIP) system offers full transparency and traceability along the whole supply chain – from retail order to cotton producer – the Mass Balance implementation can provide only limited

information down to spinning mill level and not cotton origin.

Retailers are responsible to have their supply chain informed if CmiA products are required according to the Mass Balance or according to the HIP system and that the respective importers and/or ready-made garment producers are familiar with the respective implementation requirements.





4.1 Hard Identity Preserved (HIP)

→ Retailers are responsible to have their suppliers (importers or ready-made garment producers) informed about the specific HIP implementation requirements (see HIP implementation document [🔗 \(PDF\)⁴](#)). Following HIP requirements apply also for CmiA productions using CmiA Organic cotton.

→ Under HIP, CmiA cotton must be segregated at all stages of the supply chain (from **cotton producer** to **retailer**):

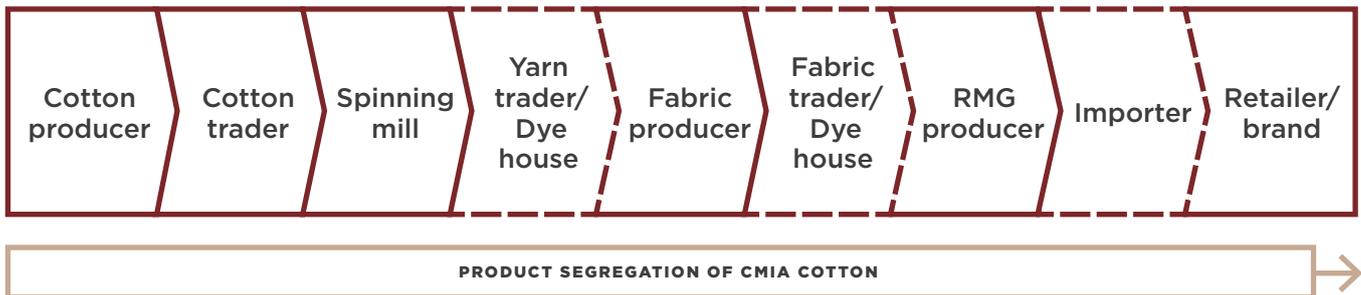


Figure 1: The CmiA HIP system throughout the supply chain

- CmiA cotton must be kept segregated at all stages of harvest, storage, transport, and processing at the farm and ginnery (cotton producer) level.
- No blending of or substitution between CmiA cotton and non-CmiA cotton is permitted at any level of the supply chain.
- CmiA cotton must be clearly marked (e.g. with signage and in sales documents).
- Sales of CmiA cotton by cotton producers [🔗 \(PDF\)²](#) to CmiA-nominated cotton traders [🔗 \(PDF\)³](#) must comprise exclusively cotton from CmiA farmers (produced in compliance with the Cotton made in Africa Standard, Volume 4 [🔗 \(PDF\)⁶](#)).
- It is always the duty and responsibility of the purchasing entity to check whether the delivering entity holds a valid CmiA verification.
- CmiA cotton and non-CmiA cotton must be kept segregated during all stages of transportation between cotton producer and spinning mill.
- Sales of CmiA cotton by CmiA-nominated cotton traders to other CmiA-nominated cotton traders or CmiA-registered spinning mills must comprise exclusively cotton from CmiA-verified cotton producers (produced in compliance with the Cotton made in Africa Standard, Volume 4 [🔗 \(PDF\)⁶](#)) and must be clearly marked as “CmiA”, especially in all sales documents.
- Physical traceability from CmiA-verified cotton producers to CmiA-registered spinning mills is mandatory.

2 <https://cottonmadeinafrica.org/wp-content/uploads/CmiA-Cotton-Companies.pdf>

3 <https://cottonmadeinafrica.org/wp-content/uploads/Cotton-Trader-CmiA.pdf>

4 https://cottonmadeinafrica.org/wp-content/uploads/CmiA_HIP_Implementation.pdf

6 https://cottonmadeinafrica.org/wp-content/uploads/CMI A_Standard_ENG.pdf

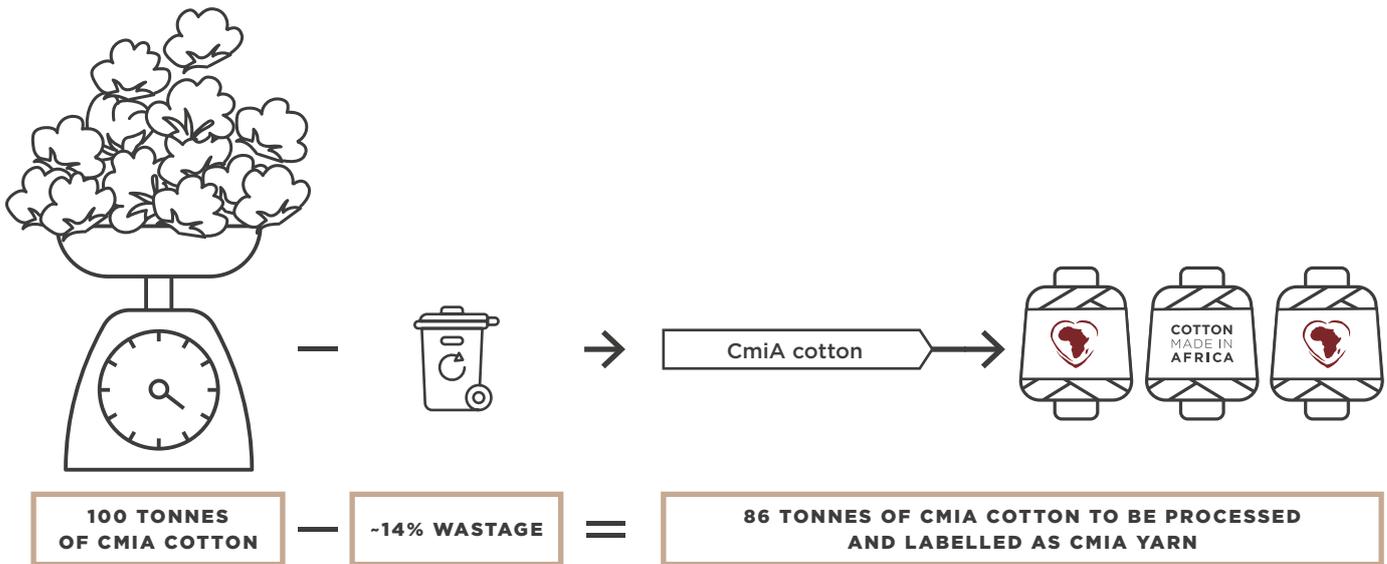


Figure 2: CmiA HIP at the spinning mill level

→ Under the HIP system, the approach must be applied to all supply chain organisations of below (from the spinning mill through to the retailer).

- CmiA cotton and conventional cotton must be kept segregated at all stages of storage, inter-facility transportation, and processing at the spinning mill level. Segregation may be physical (e.g. separate production lines) or temporal (e.g. separate production runs).
- CmiA cotton must be clearly marked at all stages of storage, inter-facility transportation, and processing at the spinning mill level (e.g. with signage and in sales documents).
- No blending of or substitution between CmiA cotton and non-CmiA cotton is permitted. However, CmiA cotton can be blended with other, non-cotton fibres.
- Spinning machinery is only required to be cleaned between CmiA HIP yarn production and any non-CmiA type of cotton production if CmiA Organic cotton is used.
- CmiA HIP yarns and non-CmiA yarns must be kept segregated at all stages of storage, inter-facility transportation, and processing at the spinning mill level. Segregation may be physical (e.g. separate production lines) or temporal (e.g. separate production runs).
- CmiA HIP yarns must be clearly marked as so at all stages of storage, inter-facility transportation, and processing at the spinning mill level (e.g. with signage and in sales documents).
- Spinning mills must accurately document their process for procuring CmiA cotton. They must retain all documents and records related to the purchase and handling of CmiA cotton and sale of CmiA-labelled yarns for a minimum period of two years.
- The same procedure applies for yarn traders/dye houses, fabric producers, fabric traders/dye houses, ready-made garment producers and importers.
- Additional documentation requirements for segregation and separation for all production levels are outlined in CmiA HIP implementation document [📄 \(PDF\)](https://cottonmadeinafrica.org/wp-content/uploads/CmiA_HIP_Implementation.pdf)⁴. Each company buying CmiA HIP products (garments/textiles, fabrics, yarns) is obliged to countercheck with its selling business partners if CmiA HIP requirements are correctly fulfilled.

→ To be labelled with the “Cotton made in Africa Inside” or the “Cotton made in Africa Organic” logo, the final product must be composed of at least five percent cotton, with the remaining percentage comprising any other, non-cotton fibre. The entire cotton share (100 percent of the cotton contained in the final product) must be CmiA or CmiA Organic cotton.

→ Detailed information about the usage of the logo can be found in the CmiA-Logo Manual.

4 https://cottonmadeinafrica.org/wp-content/uploads/CmiA_HIP_Implementation.pdf



4.2 Mass Balance (MB)

→ Under Mass Balance, CmiA cotton must be segregated during the initial stages (from **cotton producer** to **spinning mill**):

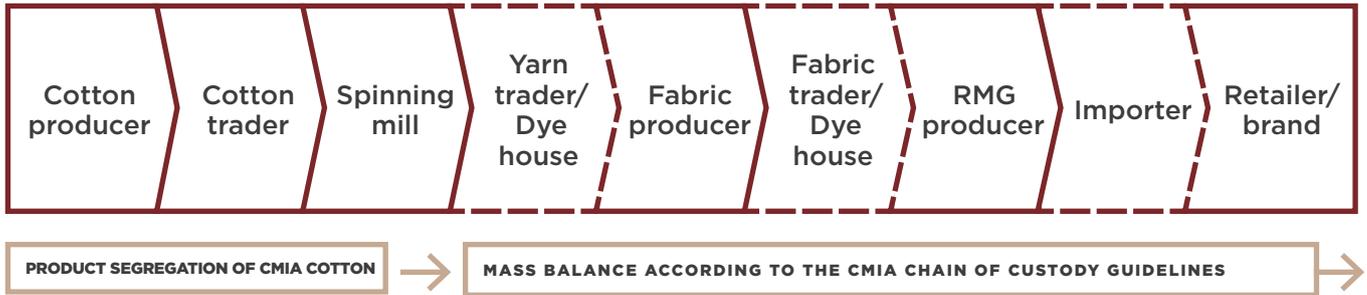


Figure 3: The CmiA Mass Balance system throughout the supply chain

- CmiA cotton must be kept segregated at all stages of harvest, storage, transport, and processing at the farm and ginnery (cotton producer) level.
- No blending of or substitution between CmiA and non-CmiA cotton is permitted.
- CmiA cotton must be clearly marked (e.g. with signage and in the sales documents).
- Sales of CmiA cotton by cotton producers [\(PDF\)](#)² to CmiA-nominated cotton traders [\(PDF\)](#)³ must comprise exclusively cotton from CmiA farmers (produced in compliance with the Cotton made in Africa standard, Volume 4 [\(PDF\)](#)⁶).
- It is always the duty and responsibility of the purchasing entity to check whether the delivering entity holds a valid CmiA verification.
- Sales of CmiA cotton by CmiA-nominated cotton traders to other CmiA-nominated cotton traders or CmiA-registered spinning mills must comprise exclusively cotton from CmiA-verified cotton producers (produced in compliance with the Cotton made in Africa standard, Volume 4 [\(PDF\)](#)⁶) and must be clearly marked as “CmiA”, especially in all sales documents.
- Physical traceability from CmiA-verified cotton producers to CmiA-registered spinning mills is mandatory.

² <https://cottonmadeinafrica.org/wp-content/uploads/CmiA-Cotton-Companies.pdf>

³ <https://cottonmadeinafrica.org/wp-content/uploads/Cotton-Trader-CmiA.pdf>

⁶ https://cottonmadeinafrica.org/wp-content/uploads/CMI_A_Standard_ENG.pdf



→ Mass Balance according to the CmiA Chain of Custody Guidelines (from **spinning mill** to **retailer**):

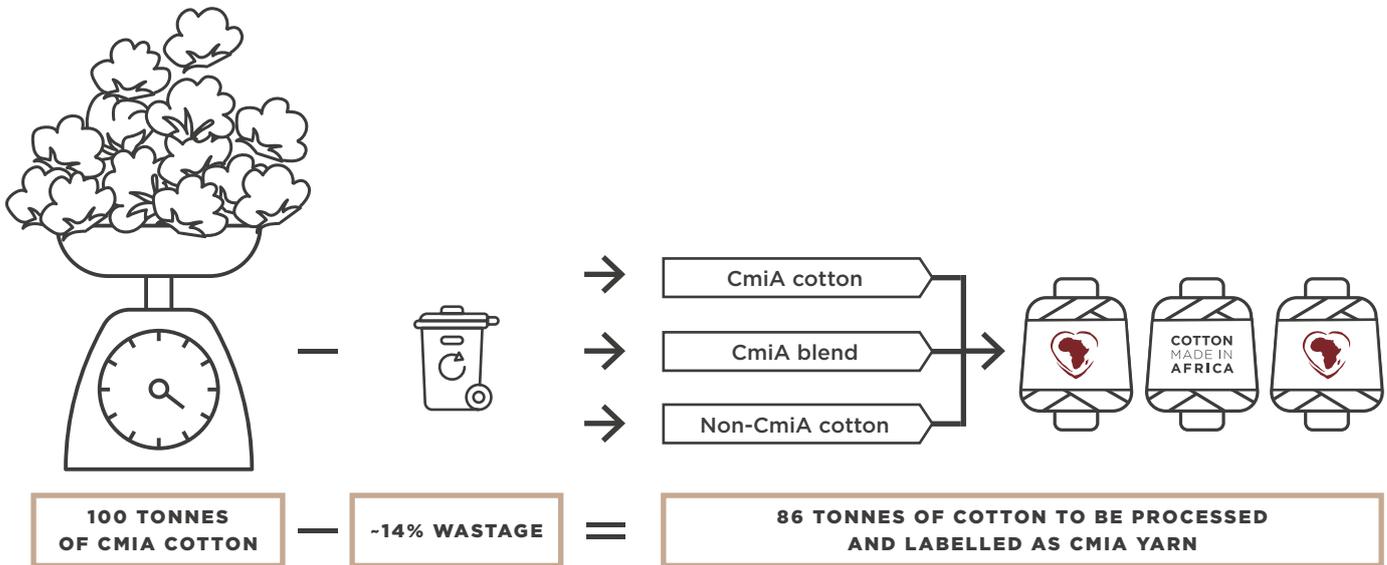


Figure 4: CmiA Mass Balance at the spinning mill level

→ CmiA-registered spinning mills may blend or substitute CmiA cotton with non-CmiA cotton. By extension, the spinning mill and all subsequent organisations in the supply chain can process CmiA cotton and CmiA-labelled products according to their needs and do not need to separate CmiA cotton or CmiA products from non-CmiA cotton or products. There are basically three options for processing under the Mass Balance system:

- Process CmiA cotton only and sell the yarn containing the physical CmiA cotton as “CmiA MB” yarn.
- Blend the CmiA cotton with non-CmiA cotton and sell the yarn as “CmiA MB” yarn.
- Replace the CmiA cotton with non-CmiA cotton and sell the yarn as “CmiA MB” yarn.

→ In all three options, **the entire cotton share of the yarn**, including waste, is deducted from the spinning mill’s cotton balance in SCOT, regardless of whether any CmiA cotton was physically used in the yarn. When the spinning mill is producing blended yarns (i.e. mixed with other fibres than cotton), only the cotton share of the total yarn amount will be deducted.

Cotton made in Africa verifies the mass balance through its Tracking System SCOT to ensure that the spinning mill is not selling more CmiA-labelled yarns than it has purchased CmiA cotton before.

The final product must contain at least five percent cotton in order to be labelled with “CmiA” and to use the “Supporting the initiative Cotton made in Africa” label.

Detailed information about the usage of the logo can be found in the CmiA-Logo Manual.



5 Product and Corporate Marketing

→ Almost all entities (besides importers) involved in CmiA's supply chain (cotton traders, spinning mills, yarn traders/dye houses, fabric producers, fabric traders/dye houses, ready-made garment producers and retailers) have the right to do marketing about their engagement with Cotton made in Africa as long as they comply with the CmiA Claims Framework, which is available at:

<https://cottonmadeinafrica.org/en/retailer-und-brands/#downloads>

6 Grievance mechanism

→ The Aid by Trade Foundation has established a Concerns and Complaints Mechanism enabling any person(s) or organisation(s) to express dissatisfaction, including actions, procedures or decisions of a supply chain organisation. Respective policies and procedures can be found on the CmiA homepage:

<https://cottonmadeinafrica.org/en/standards-system/#downloads>

7 Relevant Documents

- [Cotton made in Africa Standard, Volume 4](#)
- [CmiA Code of Conduct](#)
- [Documents for Cotton Traders](#)
- [Documents for Spinning Mills](#)
- [Documents for Yarn Trader/Dye Houses](#)
- [Documents for Fabric Producers](#)
- [Documents for Fabric Traders](#)
- [Documents for Ready-Made Garment Producers](#)
- [CmiA HIP Implementation Document](#)
- [CmiA Claims Framework](#)
- [Complaint Policy and Procedures](#)



AID BY TRADE FOUNDATION

The Aid by Trade Foundation (AbTF) was founded in 2005 by Prof. Dr Michael Otto, an entrepreneur from Hamburg, Germany. The aim of the foundation, which operates independently of the Otto Group, is to help people to help themselves through trade, thereby preserving vital natural resources and securing the livelihoods of future generations.

Cotton made in Africa® is an internationally recognised standard for sustainably produced cotton from Africa, connecting African small-scale farmers with trading companies and fashion brands throughout the global textile value chain. The initiative's objective is to employ trade rather than donations to offer help for self-help in order to improve the living conditions of around one million cotton farmers and their families in Sub-Saharan Africa while protecting the environment. The small-scale farmers benefit from training and better working conditions, and additional social projects enable their children to attend school. Female small-scale farmers are supported in pursuing professional and social independence.

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