

Cotton made in Africa (CmiA) Criteria Matrix

Version 3.1

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Based on the framework of the CmiA Verification, the CmiA Verification documents have been developed by the AbTF with specific contributions by its members and further experts and in cooperation with PricewaterhouseCoopers Aktiengesellschaft Wirtschaftsprüfungsgesellschaft.



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		CmiA vol.3.1 - Exclusion Criteria
No.	Criteria	Principle COTTON AFRICA
1	Exclusion Criteria	Managing Entities of which farmers cultivating more than 20 ha of cotton represent - more than 10% of the total cultivated surface and / or - more than 5% of farmers 1
2	Exclusion Criteria	Cotton production under irrigation. ¹
3	Exclusion Criteria	Worst forms of child labour (as defined by ILO-Conventions 138 and 182). Exceptionally, in the case of family smallholdings, children may help on their family's farm provided that the work is not liable to damage their health, safety, well-being, education or development, and that they are supervised by adults and given appropriate training.
4	Exclusion Criteria	Trafficking of persons (as defined by UN Palermo Protocols)
5	Exclusion Criteria	Bonded or forced labour (as defined by ILO Convention 29 and 105)
6a	Exclusion Criteria	Discouraging foundation and/or membership of/in institutional structures (Discouraging Freedom of Association, as defined by ILO Convention 87)
6b	Exclusion Criteria	Discouraging and/or ignorance of the right to and the outcomes of Collective Bargaining (as defined by ILO Convention 98)
7	Exclusion Criteria	Cutting of primary forest or destruction of other forms of national resources which are designated and protected by national law or international legislation (currently valid) in order to cultivate cotton. International legislation: a) Important Bird Areas (IBA) - www.birdlife.org/datazone/site b) World Heritage Sites / IUCN Categories I-IV: http://www.protectedplanet.net/ c) Ramsar Convention on Wetlands: http://www.ramsar.org/pdf/sitelist.pdf
8	Exclusion Criteria	Non-submission of input and production data in annual self-assessments as prescribed by AbTF.
9	Exclusion Criteria	Use of pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (POPs), the WHO list of highly hazardous and hazardous pesticides, and pesticides listed in the Rotterdam Convention on Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (PIC): a) Stockholm Convention: Annex A and B (page 33 ff): http://chm.pops.int/Portals/0/download.aspx?d=UNEP-POPS-COP-CONVTEXT.En.pdf b) Rotterdam Convention: Annex III (page 29 ff): http://www.pic.int/Portals/5/download.aspx?d=RC_Convention_Text_2011_English.pdf c) WHO list of hazardous pesticides class 1a and 1b (page 19ff): http://www.who.int/ipcs/publications/pesticides_hazard_2009.pdf
10	Exclusion Criteria	Pesticides are not prepared and applied by persons who are: a) not healthy b) not skilled and trained in the application of pesticides c) not eighteen years or older d) pregnant or nursing
11	Exclusion Criteria	Non-submission of verifiable list of pesticides, the corresponding active ingredients utilized and volumes (e.g. litres and/or kilogrammes) traded with farmer base during the most recent season in annual self-assessments.
12	Exclusion Criteria	Use of nationally approved pesticides registered for the use in cotton cultivation, but not labelled according to national standards and not labelled in at least one of the national language

	CmiA vol.3.1 - Exclusion Criteria						
No.	Criteria	Principle COTTON AFRICA					
13	Exclusion Criteria	The Managing Entity has no time-bound plan regarding the introduction of integrated pest management, defined as: a) growing of a healthy crop b) prevention of build-up of pest populations c) preservation and enhancement of populations of beneficial insects d) regular field observations of the crop's health and key pest and beneficial insects e) management of resistance					
14	Exclusion Criteria	Commercial growing of GMO-Cotton					
15	Exclusion Criteria	Immoral transactions in business relations defined by international covenants, national law and practices (practices that are not in contradiction with national law): OECD Guidelines (in the field of competition): a) abuse market power or dominance b) acquire market power or dominance by means other than efficient performance c) engage in anti-competitive agreements or arrangements (whether formal or informal) Exception: concession areas/zones awarded/endorsed by government (e.g. Mozambique)					
16	Exclusion Criteria	Non-respect of the principle of equal remuneration for men and women workers for work of equal value (as defined in ILO Convention 100, Art. 1)					
17	Exclusion Criteria	II) is crimination in the workplace (as defined in II () (convention 111)					

In the case that larger scale farming and irrigation become relevant with CmiA management units, the Aid by Trade Foundation Management, in close consultation with the CmiA Technical Committee on Verification, will amend the CmiA verification matrix accordingly.

					CmiA vol.3.1 - Farm Level Criteria				
No.	Criteria	Category	Principle	G/Y/R	Traffic Light Assessement COTTON AFRICA				
	Sustainability Criteria			Green	The Managing Entity provides sufficient evidence to demonstrate that it is aware of social issues with regard to education and/or health within its farmers base, that it has identified its priorities and it is actively engaged in implementing one or mo such donor or government supported social welfare programme. Furthermore, indicators are in place to measure its success and success is measured.				
1		General	Social welfare programs	Yellow	The Managing Entity provides sufficient evidence to demonstrate that it is aware of social issues with regard to education and/or health within its farmers base, that it has identified its priorities and it is actively engaged in proposing or beginning to implement one or more such donor or government supported social welfare projects.				
				Red	The Managing Entity has not identified social issues with regard to education and/or health within its farmers base and has no programmes addressing such issues.				
	Sustainability Criteria	CmiA farmers	Written contracts	Green	The Managing Entity provides sufficient evidence to demonstrate that all farmers receive written contracts on input supply and output sales with buyers, ginneries or their appointed agents who honour these contracts. There is field evidence that farmers do understand the implications of the contracts and pre-financing terms. The Managing Entity can demonstrate that it has mechanisms to train farmers on how to calculate the return on their own labour (input-output calculation). Alternatively: Collective bargaining results are applied to all farmers.				
2a				Yellow	The Managing Entity provides sufficient evidence to demonstrate that all farmers receive written contracts on input supply with buyers, ginneries or their appointed agents who honour these contracts. But there is field evidence that farmers do not understand the implications of the contracts. Where farmers rely on pre-financing inputs in order to grow their cotton, they have access to the pre-financing terms and conditions.				
				Red	The Managing Entity cannot provide sufficient evidence to demonstrate that all farmers receive written contracts on input supply with buyers, ginneries or their appointed agents who honour these contracts or no contracts exist.				
2b	Sustainability Criteria		Equal rights regarding gender	Green	The Managing Entity provides sufficient evidence to demonstrate that it is actively raising awareness of gender issues among its staff and within the farmer base. It is actively engaged in training women to serve as trainers or as lead farmers and/or alternatively the Managing Entity actively encourages the formation of female producer groups (or producer groups including females) and supports these groups with know-how and resources. The Managing Entity can provide evidence that it is actively engaged in signing contracts with female farmers. Alternatively, the Managing Entity can provide evidence that it is actively engaged in granting female farmers access to agricultural training and inputs and / or other training inputs (e.g. literacy training courses). Continuous improvement should be verifiable, e.g. evidence shows that the number of contracts signed with women has increased continuously.				
				Yellow	The Managing Entity provides sufficient evidence to demonstrate that it is actively raising awareness of gender issues among its staff and within the farmer base. The Managing Entity encourages female farmers to access training or inputs.				
				Red	There is obvious lack of awareness in the Managing Entity with regard to gender issues or the Managing Entity is actively refusing to make contracts with female farmers or female farmers to become CEAs/lead farmers or to be trained or to receive inputs.				
3a		Soil and water conservation	Soil and water conservation	Green	Farmers receive regular training to improve their agricultural practices in cotton production and the Managing Entity provides sufficient evidence to demonstrate that training needs are identified, target groups are defined, training content or type is appropriate for the respective target groups. Furthermore, training is conducted regularly and more than 50% of farmers apply one or more methods of soil and water conservation (e.g. conservation farming, production of compost, etc.). Training content needs to address the most promising agricultural practices showing quick wins and are easy to apply. Thus the farmers have a direct positive impact.				
Ja				Yellow	Farmers receive training to improve their agricultural practices in cotton production and the Managing Entity provides sufficient evidence to demonstrate that training needs are identified, target groups are defined. Training is not conducted regularly but sporadically. Training content does not reflect improvements on respective local circumstances nor does field evidence demonstrate that most farmers understand the positive impact of the trained practices.				
				Red	No demonstrable formal training procedures are in place.				
	Sustainability Criteria	Soil and water conservation	Crop rotation	Green	There is sufficient evidence that crop rotation includes stand-alone plantings for legumes or intercropping with legumes. The Managing Entity can provide sufficient evidence that crop rotation is a common practice and sustainably applied.				
3b				Yellow	The Managing Entity provides sufficient evidence to demonstrate that training is given regarding crop rotation of 3 crops or alternative practices like intercropping with legumes or stand alone planting of legumes.				
				Red	Field evidence demonstrates that farmers do not understand the concept and benefits of crop rotation. Farmers are not trained with regard to the concept of crop rotation and alternative practices like intercropping with legumes or stand alone planting for legumes.				
		Handling and application of pesticides	d Pesticide management	Green	The Managing Entity provides sufficient evidence to demonstrate that it has an understanding about and actively pursues a strategy to manage the pesticides used for cotton cultivation aiming at minimizing impact on environment and health as well as pest resistance within their unit whenever economically and legally viable.				
4a				Yellow	The Managing Entity provides sufficient evidence to demonstrate an understanding about the impact of pesticides used for cotton cultivation on environment, health and pest resistance but lack an integrated improvement strategy.				
				Red	The Managing Entity does not provide sufficient evidence to demonstrate an understanding about the impact of pesticides used for cotton cultivation on environment, health and pest resistance and lack an integrated improvement strategy.				

					CmiA vol.3.1 - Farm Level Criteria			
No.	Criteria	Category	Principle	G/Y/R	Traffic Light Assessement COTION AFRICA			
			Storage and transport of pesticides	Green	The Managing Entity provides sufficient evidence to demonstrate that farmers and affected employees (in the scope of the CmiA Unit) have been made aware of the risks and dangers related to the storage of pesticides (including leaking containers) and have been trained in appropriate safe storage measures such that access by children is prevented. (More than 80% of the farmers visited store their chemicals correctly and prevent access by children.)			
4b	Sustainability Criteria	Handling and application of pesticides		Yellow	The Managing Entity provides information to farmers and affected employees about the risks and dangers related to the storage of pesticides (including leaking containers), however, they have not received training in appropriate safe storage measures such that access by children is prevented. (More than 50% of the farmers visited store their chemicals correctly and prevent access by children.)			
				Red	There is an obvious lack of awareness of the need to inform farmers or affected employees of the risks and dangers related to the storage of pesticides (including leaking containers).			
	Sustainability Criteria Application of pesticides and user health protection	Application of	Spraying of pesticides and health protection	Green	Regarding application of pesticides, the Managing Entity demonstrates awareness about the possibilities of runoff or leaching of chemicals into streams or ground water and can prove that this is significant or non-significant for the Unit. If leaching of chemicals into streams or ground water is significant: Techniques to prevent runoff and leaching of chemicals are part of the farmer training. There is field evidence that farmers understand the concepts and these are applied by more than 66% of sampled farmers. Comment on "non-significance": When the farmer does not use application methods where more than 20 litres of spray mix/ha are applied in a single application (e.g. ULV or LV sprayers). In view of user health protection, the Managing Entity provides sufficient evidence to demonstrate that farmers have been trained in the use of safe spraying techniques, appropriate equipment and sufficient protective clothing as necessary for operator safety relative to the applied pesticide and the application equipment used (e.g. shirts with long sleeves, trousers, closed shoes, masks, gloves, safety goggles). More than 80% of the sampled operators use protective clothing throughout a campaign, that means - minimum shirt with long sleeves, long trousers, closed shoes, masks, gloves and safety goggles in the case of mixing/preparation - minimum shirt with long sleeves, long trousers and closed shoes in the case of application. Field evidence demonstrates that operators are not pregnant or nursing females or underaged. There are measures in place to promote the use of safer application equipment and success is measured.			
4c		pesticides and user health		pesticides and		Regarding application of pesticides, the Managing Entity demonstrates awareness about the possibilities of runoff or leaching of chemicals into streams or ground water and can prove that this is significant or non-significant for the Unit. In the case of significance, however, the farmer is generally informed regarding the dangers of leaching of chemicals into streams or ground water. There is no field evidence that farmers apply the necessary techniques. In view of user health protection, the Managing Entity provides information to farmers regarding the use of safe spraying techniques, appropriate equipment and sufficient protective clothing as necessary for operator safety relative to the applied pesticide and the application equipment used (e.g. shirts with long sleeves, trousers, closed shoes, masks, gloves, safety goggles) but there is no evidence of training. A significant and increasing number of the sampled operators use protective clothing throughout a campaign, that means - minimum shirt with long sleeves, long trousers, closed shoes, masks, gloves and safety goggles in the case of mixing/preparation - minimum shirt with long sleeves, long trousers and closed shoes in the case of application. Field evidence demonstrates that operators are not pregnant or nursing females or underaged.		
							Red	Regarding application of pesticides, the Managing Entity does not demonstrate awareness about the possibilities of runoff or leaching of chemicals into streams or ground water. There is no field evidence that farmers apply the necessary techniques. In view of user health protection, there is an obvious lack of awareness with regard to the need to inform and train farmers in the use of safe spraying techniques, appropriate equipment and sufficient protective clothing as necessary for operator safety relative to the applied pesticide and the application equipment used. Operators do not have access to affordable protective clothing throughout a campaign.
4d	d Criteria application	Handling and application of	Disposal of empty plant lication of ticides containers	Green	The Managing Entity provides sufficient evidence to demonstrate that farmers have been trained regarding the dangers of re- using empty pesticide containers and how to dispose of these in a safe manner such as burning, buring or disposal in a pit latrine and/or returning them. There is field evidence that farmers understand the concept and this is being generally applied. There are initiatives (communication) to design packaging and containers in a way that they can be disposed of safely in the field (e.g. burning, buring or disposal in a pit latrine w/o health and env. risk).			
				Yellow	The Managing Entity provides sufficient evidence to demonstrate that the farmer is generally informed regarding the dangers of re-using empty pesticide containers and how to dispose of these in a safe manner, but there is no evidence that this is being applied.			
				Red	There is no field evidence that farmers are practicing safe disposal of empty containers.			
	Criteria	Handling and application of pesticides	Integrated Pest Management / pest thresholds	Green	The Managing Entity provides sufficient evidence to demonstrate that farmers have been trained in the principles of scouting and pest thresholds, which lead to the use of less pesticides. There is field evidence that farmers understand the concept and it is being applied by at least 80% of sampled farmers.			
4e				Yellow	The Managing Entity provides sufficient evidence to demonstrate that more than 80% of farmers have been trained in the principles of scouting and pest thresholds, which lead to the use of less pesticides. There is field evidence that farmers understand the concept.			
				Red	There is an obvious lack of awareness of the need to inform and sensitize farmers about the principles of scouting and pest thresholds, which lead to the use of less pesticides.			

					CmiA vol.3.1 - Farm Level Criteria
No.	Criteria	Category	Principle	G/Y/R	Traffic Light Assessement COTTON AFRICA
	Sustainability Criteria	Agronomy	Training to improve farmer's skills and capacities	Green	Farmers receive regular training to improve their agricultural practices in cotton production and the Managing Entity provides sufficient evidence to demonstrate that training needs are identified, target groups are defined, training content or type is appropriate for the respective target groups. Furthermore, training is conducted regularly, indicators are in place to measure its success and success is measured. This does not imply that the Managing Entity has to undertake the training. Training content should include: • early and appropriate land preparation • timely planting (and seed is available in time) • correct plant population and density • regular weeding to prevent competition with the crop • harvesting techniques, including control of polypropylene contamination.
5				Yellow	The Managing Entity provides sufficient evidence to demonstrate that sporadical training is given on some of the following issues: • early and appropriate land preparation • timely planting (and seed is available in time) • correct plant population and density • regular weeding to prevent competition with the crop and: • harvesting techniques relating to reducing contamination.
				Red	No demonstrable formal training procedures with regard to the below mentioned issues are in place. • early and appropriate land preparation • timely planting (and seed is available in time) • correct plant population and density • regular weeding to prevent competition with the crop.
62	Sustainability Criteria	Pre-financing of inputs	Prefinancing of inputs	Green	With reference to farm level criterion 2a, the managing entity provides sufficient evidence to demonstrate that it or the input pre-financing body provides pre-financing for inputs, such as seed, fertilizer and pesticides. Furthermore it is evident that the managing entity and/or the input pre-financing body has a comprehensive and transparent system to enable the farmer to understand the pre-financing terms. Interest -if applied- is outlined and favourable, compared to market rates. Field evidence demonstrates that farmers understand different financing options and have access to and freedom of choice to purchase (cash or financed) all inputs either at the beginning of the planting season or on demand during the planting season. If requested by the farmers, non-utilized inputs can be given back by farmers to the managing entity and/or the input pre-financing body at a mutually agreed rate at the moment of input sales not later than one month before harvesting.
6a				Yellow	With reference to farm level criterion 2a, the managing entity provides sufficient evidence to demonstrate that it or the input pre-financing body provides pre-financing for inputs, such as seed, fertilizer and pesticides. Furthermore it is evident, that the managing entity and/or the input pre-financing body has a comprehensive and transparent system to enable the farmer to understand the pre-financing terms. Field evidence demonstrates that farmers understand the financing terms. Farmers have to make their investment decision before the beginning of the planting season.
				Red	The Managing Entity and / or any other pre-financing body does not provide credit to farmers in order to pre-finance inputs (e.g. cotton seed, fertilizer, pesticides) and/or financing terms are not transparent to the farmers, and/or there is evidence that input prices and interest rates are not favourable to farmers.
6b	Sustainability Criteria	Input prices	Transparency of input and cotton seed prices for farmers	Green	The Managing Entity provides sufficient evidence to demonstrate that the final cost of the inputs required to grow cotton (including any other charges) and any contracted services supplied within the Management Unit, is advised to the farmer or farmer groups before it is accepted and used. The Managing Entity can prove fair pricing mehods and makes price calculations accessible and transparent to the farmer or farmer groups (this does not mean that the Managing Entity needs to be the distributor of the inputs). Alternatively: In a competitive market environment, input prices are considered to be fair if they correspond to market prices or are lower.
				Yellow	It is evident that the final cost of the inputs required to grow cotton (including any other charges) and any contracted services supplied by the Management Unit, is public knowledge, but field evidence does not demonstrate that the farmer/farmer group knows.
				Red	The final cost of the inputs required to grow cotton (including any other charges) and any contracted services supplied by the Management Unit, is not advised to the farmer before he accepts and uses them.
•	Sustainability Criteria	Quality	place	Green	The Managing Entity provides sufficient evidence to demonstrate that there are procedures in place to grade seed cotton quality and an arbitration system, which has been accepted by farmers and buyers, is in place.
6c				Yellow	Seed cotton quality is graded but the grading and grade payment system is not transparent to the farmer.
				Red	Seed cotton quality is not graded and there is only a single price.
6d	Sustainability Criteria	Quality	through improved harvesting and post harvesting techniques	Green	The Managing Entity has procedures in place to identify the main influencing issues on fibre/lint quality and implements measures to improve lint quality to maximise its marketable value. The managing entity has embedded the most promissing harvest and post harvest techniques in the training and actively discourages farmers to utilize polypropylene bags for harvesting.
				Yellow	The Managing Entity has no systematic procedures in place, however, basic principles are applied.
				Red	There is no quality enhancement management evident.
	Sustainability Criteria	Commerce	Payment of cotton to farmers	Green	Farmers receive cash payments for their cotton at latest 30 days after delivery to the point of sale. Any deductions made for inputs provided on credit are transparent to the farmer in the payment process.
6e				Yellow	Cash payments are received < 90 days after delivery to the point of sale. Any deductions made for inputs provided on credit are not transparent to the farmer in the payment process.
				Red	Cash payment of cotton is received > 90 days after delivery to the point of sale. Any deductions made for inputs provided on credit are not transparent to the farmer in the payment process.

			CmiA vol.3.1	- Ginr	nery Criteria
No.	Criteria	Category	Principle	G/Y/R	Traffic Light Assessment COTION APRICA
	Sustainability Criteria	Employees and workers in ginneries	Labour contracts in ginneries	Green	All employees receive written employment contracts in accordance with national laws. There is a clearly set minimum age for workers in ginneries and a robust age verification system in place. Working conditions of young workers (age between minimum age and 18 years) are non-hazardous and light and do not interfere education of the young worker.
1				Yellow	Informal but transparent contractual agreements are used. Minimum age monitoring as well as a monitoring of working conditions is demonstrated but not documented nor systematic.
				Red	Employees do not receive any kind of contractual agreement minimum age monitoring as well as a monitoring of working conditions is not evident.
			Working hours in ginneries are	Green	Working hours comply with national law and overtime working hours are fully remunerated in line with local requirements.
2	Sustainability Criteria	Employees and workers in ginneries	regulated and overtime work (includes shift and night	Yellow	Transparent working hour timetables exist and working hours are recorded individually.
			allowances) is remunerated	Red	Working hours do not comply with national law and all overtime working hours are not remunerated.
-3	Sustainability Criteria	Employees and workers in ginneries	Wages in ginneries comply with national law or sector agreements	Green	Wages of permanent workers/employees are above existing national minimum wages (including allowances) or sector agreements, which ever is higher. This includes the payment of all insurances and allowances required by local law. Wages of seasonal workers comply with existing national minimum wages. Alternatively: Collective Bargaining agreements for are applied and above minimum wage (permanent workers) or comply with minimum wages (seasonal). (If no minimum wage regulation exists locally common rates should apply or governmental recommendations apply.)
				Yellow	Wages for permanent and seasonal workers/employees comply with existing national minimum wages. Alternatively: If no minimum wage regulation exists locally common rates, or governmental recommendations shall apply.
				Red	Wages are below existing national minimum wages.
	O to in a la ilita	Employees and workers in ginneries	Employer assures proper occupational health and safety conditions in gins including and not limited to dust and noise reduction measures and PPE for dust protection and noise reduction.	Green	Compliance with statutory health and safety regulations as well as company standards specific to cotton ginning is substantiated by formal documentation. Success is measured and performance can be demonstrated.
4	Sustainability Criteria			Yellow	Procedures and equipment to avoid unhealthy and unsafe working practices exist. There as sporadic health safety and social activities based on recent events.
				Red	Unhealthy and/or dangerous practices are used with high frequency.
	Sustainability Criteria	Environmental impact	Environmental management plan	Green	The Managing Entity demonstrates that the gins which carry out CmiA cotton ginning have developed and implemented appropriate measures and practices, which enable the gin to identify the main environmental impacts of the operation. The gin operation has activities planned to remediate undesireable environmental impacts incl. potential investment requirements. Legal requirements and requirements embedded in the operating licence are observed and adhered to.
6				Yellow	The Managing Entity demonstrates that the Gins which carry out CmiA cotton ginning have developed and implemented appropriate measures and practices, which enable the gin to identify the main environmental impacts of the operation. Legal requirements and requirements embedded in the operating licence are observed and adhered to.
				Red	There is sufficient evidence that the gin operation has no awarenes with regard to the envrionmental impact of the operations.

CmiA vol.3.1 - Management Criteria

No. Category Principle



Once the CmiA Unit is formed (comprising of a certain amount of cotton farmers as well as at least one ginning operation as a minimum requirement) the CmiA Unit needs to have some organisational structure. As described in the Verification Governance, the Managing Entity is responsible for managing the Unit. In order to receive the licence to sell CmiA cotton, the Managing Entity has to fulfill the minimum requirements listed below.

IVIani	aging Entity has to	idilli the minimum requirements listed below.
1a	Policies	Policies are developed by the Managing Entity describing the overall position of the Unit with regard to the CmiA claim
1b	T OHOIGS	The Managing Entity actively communicates position and policies within the CmiA Unit
2a		The Managing Entity has a mechanism to implement and govern the policies
2b	Identification of required action and improvement	The Managing Entitiy has the ability to translate the CmiA Criteria into the local context and to identify the most important local issues in the different dimensions of the sustainability matrix
2c	opportunities	The Managing Entity has the ability to prioritise the improvement opportunities based on: (i) Severity of impact when a situation remains or (ii) opportunities once a situation is improved (e.g. positive impact)
3a		The Managing Entity demonstrates the ability to formulate specific objectives to improve on the most important local issues to move towards more sustainable practices
3b	Management plan	The Managing Entity has planned specific targets to achieve the objectives and has set target dates for the required action items
3с		The Managing Entity has secured funding e.g. with donors, AbTF, government or own resources
4a		The Managing Entity has the ability to implement and pursue required actions with funds and ressources
4b	Implementation capacity	The management plan is also reflected in budgeting/planning for the consequtive years to reflect continuity
4c		The Managing Entity has made sure that appropriate skill levels are maintained along the cotton chain to ensure that objectives are achieved effectively and cost sensitive
5a		The Managing Entitiy has formulated performace indicators to monitor the progress of the management plan towards the different targets
5b	Review and	The Managing Entity has procedures in place to review the progress against the Management Plan on a regular basis to: (i) Confirm Progress (ii) Adress issues and risks (iii) Adjust actions and plan to ensure success of the actions
5c	monitoring	The Managing Entity has instruments in place to regularly review the CmiA Unit to identify potential non-compliances to own objectives and targets as well as potential breaches of the exclusion criteria
5d		The Managing Entity can demonstrate that the gin operation has procedures in place to communicate to the local communities and to provide a platform for the local community to address potential issues, enquiries and complaints
6	Continuity	The Managing Entity has measures in place to ensure continuity of the achieved objectives
7	Corrective action	The Managing Entity has procedures and instruments in place to implement corrective actions resulting from the review and monitoring activities
8	Incidents and emergencies	The Managing Entity demonstrates to react appropriately to emergencies and incidents happening in areas under which it has management control (e.g. gins)