



COTTON
MADE IN
AFRICA

Cotton made in Africa Standard

PRINCIPLES, CRITERIA AND INDICATORS

Volume 4 | December 2020

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Introduction

1. About Cotton made in Africa

→ **Cotton made in Africa (CmiA)** is an initiative of the Aid by Trade Foundation (AbTF), which was established in 2005 with the objective of helping people help themselves through trade in order to promote sustainable development, protect the environment, and secure a better future for coming generations. The “Cotton made in Africa” or “CmiA” trademark is sold to buyers and consumers as a baseline sustainability concept. With the support of various partners from the worlds of business, politics, science, and non-governmental organisations (NGOs), the foundation aims to forge an international alliance of fashion brands and retailers that source CmiA-certified raw cotton, have it processed into textiles, and pay a licensing fee to use the CmiA seal. Cotton made in Africa then reinvests this licensing revenue in the cotton-growing regions of Sub-Saharan Africa in accordance with social business principles.

To support the CmiA sustainability claim, which focusses on the supply and value chains for the cultivation

and ginning of cotton in participating Sub-Saharan African countries, the standard provides the basis for uninterrupted traceability from farm to ginnery.

CmiA lint is sold farther downstream, with Chain of Custody (CoC) Guidelines ensuring uninterrupted traceability up to the spinning mills. To process cotton verified under AbTF standards into garments, brands and retailers can choose either the Mass Balance (MB) or the Hard Identity Preserved (HIP) system. More detail on these systems is provided in the CoC Guidelines, available at www.cottonmadeinafrica.org.

The Cotton made in Africa claim is more thoroughly defined through principles, criteria, and indicators that include management requirements as well as social, environmental, and economic aspects relating to the cultivation and ginning of cotton.



2. Theory of Change

→ A **Theory of Change (ToC)** is a logical framework that describes an organisation's desired impacts and depicts how the organisation intends to contribute to this change. The CmiA Theory of Change (ToC) outlines the CmiA initiative's activities and links these to the intended immediate outputs, medium-term outcomes, and long-term impacts. It encompasses CmiA's interventions in all areas, including both field- and ginnery-level cotton production as well as its actions within the supply chain. The ToC thus plays a fundamental role in CmiA's Monitoring, Evaluation, and Learning (MEL) system, allowing us to derive and regularly monitor key performance indicators and long-term goals.

Equipment, financial resources, and non-monetary resources together with AbTF staff's and experts' knowledge on sustainable and profitable cotton production

(as inputs) enable the Managing Entities to conduct high quality trainings. Capacity building and training (as activities) lead to increased knowledge on the application of management procedures (as outputs) and know-how on various agro-technical as well as social and environmental topics (as outcomes). This will positively impact working conditions, livelihoods, and resilience while leading to diversified crop portfolios, reduced input costs, higher yields, and increased income from cotton for farming families. In addition, improved knowledge will result in less pesticide use and greater soil fertility, thereby reducing the contamination of natural resources and better protecting eco-system services. The sustainably produced and verified cotton is sold on the world market. Retailers and brands pay a licensing fee for the usage of the label. This income is used to finance the activities in the project regions.

More information about CmiA's Theory of Change can be found on the initiative's website at <https://cottonmadeinafrica.org/en/impacts/#downloads>

3. How to Use This Standard

Scope and Assurance

→ The CmiA Standard covers the most significant aspects of cotton cultivation and ginning, with a focus on specific framework conditions in Sub-Saharan Africa. The principles and criteria describe the intended outcomes through their implementation. 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.

The responsibility for ensuring compliance with the CmiA principles, criteria, and indicators lies with the certificate holders, referred to as the “Managing Entities” in the context of the CmiA standard and its implementation. They are bound by a set of 58 criteria that apply at either the field level, the ginnery level, or both. The CmiA standard is built on compliance with all applicable laws, and Managing Entities must always abide by the highest set standard. For example, in cases where national legal

standards exceed the corresponding internationally recognised ones, national legislation shall prevail, and vice versa.

A Managing Entity is responsible for management and production activities and must be able to demonstrate that everyone working in or with its CmiA unit operates according to the requirements of the CmiA standard. Based on self-assessments and third-party verification results, the Managing Entity is required to design and implement continuous-improvement plans to maintain or improve its performance level with regard to the criteria and indicators outlined in the CmiA standard.

Additional information about various stakeholders' roles and responsibilities regarding assurance is available in the CmiA Assurance Manual.



Chapters

The CmiA Standard is composed of four chapters:

- The **Management Pillar** sets out the requirements related to responsible business conduct, the verification process, and commitment to CmiA values.
- The **People Pillar** contains requirements intended to define CmiA's understanding of small-scale farmers and to ensure decent working conditions, with a specific focus on the empowerment and development of women and children.
- The **Planet Pillar** aims to cover the most pressing environmental issues and to define how cotton can be cultivated and ginned in a way that mitigates negative impacts while increasing the resilience of the agro-ecosystem and the environment of communities farming and ginning cotton in rural areas across Sub-Saharan Africa.
- The **Prosperity Pillar** consists of requirements that enable cotton farmers to acquire fundamental business skills and to sustainably increase productivity and quality. On a broader scale, these requirements make it possible for communities to improve their livelihoods and resilience.

Every chapter is divided into three sections, i.e. three principles per pillar. Principles summarise the fundamental aspirations of the CmiA initiative. An overview of the principles is given under section 5 of this introduction.

Structure

The principles are presented as follows:

- **Principles** constitute the key aspirations of the Cotton made in Africa initiative.
- **Criteria** are requirements that need to be met in order to fulfil a principle.
- **Intent** provides the rationale for a given requirement.
- **Indicators** are measurable aspects that enable verifiers to assess whether or not the corresponding criterion has been met.
 - Indicators are presented in a table format, with all **core indicators** being listed first, followed by any applicable **improvement indicators**.
 - **Field/ginnery level:** On the right side of each indicator two columns—the first for the field level, the second for the ginnery level—highlight the category to which the indicator applies or, more precisely, at which level the indicator will be verified. A tick is placed in the corresponding column.
- **Guidance for implementation** gives recommendations on how to fulfil the requirements.





Requirements

The principles set out in the CmiA standard represent the aspirational goals and expectations that CmiA has with regard to the CmiA Managing Entities and farmers. Even though its aspirations will remain unchanged, CmiA's minimum expectations, which this standard translates into verifiable indicators, may change in tandem with society, technology, and manufacturing practices.

There are two types of indicators:¹

- **Core indicators** must be fulfilled for a verified Managing Entity to obtain or maintain a CmiA certificate. Non-compliance with a core indicator will lead to the denial or withdrawal of the Managing Entity's CmiA certificate.
- **Improvement indicators:** Non-compliance with these indicators does not, in itself, prevent a Managing Entity from obtaining a CmiA certificate.

For both core and improvement criteria, verifiers may identify potential improvements, and it is up to the Managing Entity to create a continuous-improvement plan (CIP) to increase compliance with the CmiA standard and its requirements.

The CmiA standard is both performance-based (compliance with core criteria is required) and practice-based (practices undergo continuous improvement). To receive a Cotton made in Africa certificate, Managing Entities must first meet the core indicators. All core indicators are equal in status, validity, and authority.

4. Change History

NAME OF DOCUMENT	DATE OF PUBLICATION	CHANGE
Cotton made in Africa (CmiA) Criteria Matrix	2010-03-31	First publication
Cotton made in Africa (CmiA) Criteria Matrix Version 2	2012-01-01	<p>Introduction of four new exclusion criteria: definition of composition of farmer base of a Management Unit / small-scale farmers (1); exclusion of irrigation (2); correct labelling of pesticides (9, formerly farm-level sustainability criteria 4a); time-bound Integrated Pest Management Plan (10);</p> <p>Changes for a better understanding of exclusion criterion on child labour (3, formerly 1);</p> <p>Addition of WHO class Ia and Ib to list of banned pesticides to exclusion criterion 8 (formerly 6);</p> <p>Introduction of two new farm-level sustainability criteria and, in consequence, adapted numeration: Equal rights regarding gender is now criterion 2b (former criterion 2 has become 2a); pesticide management has been introduced as the new farm-level criterion 4a (former 4a has become new exclusion 9), the former criterion 4e on runoff and leaching has been incorporated into criterion 4c, and therefore former 4f is now 4e; several traffic light descriptions now include expected application rates of trained topics;</p> <p>Ginnery-level sustainability criteria are unchanged but re-numbered (formerly 7a-7f, now 1-6);</p>

¹ Details on the CmiA Assurance System, e.g. how indicators are assessed by independent verifiers, can be found in the CmiA Assurance Manual.



Cotton made in Africa (CmiA) Criteria Matrix Version 3	2014-01-01	Introduction of three new exclusion criteria : non-submission of input and production data (8); persons excluded from pesticide preparation and application (10); non-submission of detailed pesticide data including active ingredients; concentrations and volumes (11)); changes for a better understanding of exclusion criteria 1 and 9 (formerly 8); new farm-level sustainability criterion on pre-financing of inputs (6a); amendment of traffic light assessment of farm-level sustainability criterion 4e on Integrated Pest Management / threshold spraying
Cotton made in Africa (CmiA) Criteria Matrix Version 3.1	2015-02-15	Requirement on collective bargaining upgraded from sustainability criterion at the farm level (part of 2a) and at the ginnery level (5) to exclusion criterion (6b); addition of two new exclusion criteria (equal pay (16) and discrimination (17))
Cotton made in Africa Standard: Principles, Criteria, and Indicators, CmiA. Volume 4	2020-12-28	Major revision of the CmiA Standard System Overview of changes in table below, and summary of where to find retained criteria of Vol. 3.1 presented in Annex C.

5. Evolution of the CmiA Standard: From CmiA Vol. 3.1 to CmiA Vol. 4

The following table outlines the main differences between Volume 3.1 and Volume 4 of the CmiA standard:

	CMIA VOL. 3 (2014) / VOL. 3.1 (2015)	CMIA VOL. 4 (2020)
General structure	<p>The CmiA standard is presented in the CmiA Criteria Matrix according to the type/scope of requirements:</p> <ul style="list-style-type: none"> a. Exclusion criteria (at both field and ginnery levels) b. Sustainability criteria (at the farm level) c. Sustainability criteria (at the ginnery level) d. Management criteria (prerequisites for participation, as defined by CmiA Governance). 	<p>The CmiA standard is divided into one management pillar and three sustainability pillars:</p> <ul style="list-style-type: none"> a. Pillar 1: Management b. Pillar 2: People c. Pillar 3: Planet d. Pillar 4: Prosperity <p>Principles, criteria, and indicators are grouped into these pillars according to their thematic specifics, along with an indication as to whether:</p> <ul style="list-style-type: none"> a. they are core or improvement indicators; and b. they apply to the field or the ginnery level.
Terminology	<ul style="list-style-type: none"> • Exclusion Criterion (negative formulation) • Sustainability/Development Criterion • Management Plan 	<ul style="list-style-type: none"> • Core indicator • Improvement indicator • Continuous-improvement plan (CIP).
Formulation of criteria	<p><i>Exclusion criteria</i> describe unwanted/prohibited practices.</p> <p><i>Sustainability criteria</i> highlight a specific topic, and definitions are given for the different performance levels of each criterion with the ratings of red, yellow, or green.</p>	<p>All principles, criteria, and indicators are formulated to describe intended/best practices.</p>



	CMIA VOL. 3 (2014) / VOL. 3.1 (2015)	CMIA VOL. 4 (2020)
Rating system	<p>The ratings are divided into:</p> <p><i>Red and green</i> (equivalent to <i>fail</i> and <i>pass</i>) for exclusion criteria, and a performance-oriented traffic light system (<i>red</i>, <i>yellow</i>, and <i>green</i>) for sustainability criteria.</p>	<p>Verifiers will rate performance for each indicator on a scale of zero to five, with five points being the maximum.</p> <p>A core indicator rated with zero points is regarded as major non-compliance, leading to the consequences outlined in the CmiA Assurance Manual document.</p>
New content	N/A	<p>Management requirements are upgraded to (mostly) core indicators.</p> <ul style="list-style-type: none"> Data management systems and monitoring and evaluation procedures for the training and application of trained methods need to be in place Several required policies and procedures must be defined and implemented (e.g. non-discrimination, gender equality, and child labour) Grievance procedures for the field and ginnery levels need to be established <p>Field level:</p> <ul style="list-style-type: none"> Several issue-specific plans required, e.g. water stewardship, biodiversity, and soil management Requirements for the responsible use of land extended More details on correct pesticide application Requirements for the adaptation to and mitigation of climate change introduced Focus on quality and timing aspects for input provision More detailed requirements for maximising cotton productivity and fibre quality Capacity building for basic agricultural business skills made mandatory <p>Ginnery level:</p> <ul style="list-style-type: none"> Several requirements upgraded to core indicators, e.g. labour contracts, working hours and overtime, and health and safety Commitment to respectful working environment without harassment Good practices regarding social security Provision of clean drinking water, sanitation facilities, etc. Access to adequate medical care
Pesticide list	List of banned pesticides, including all pesticides listed by conventions (POPs, PIC) and categorised by WHO as class Ia or Ib.	List of banned pesticides extended to also include the Montreal Protocol, GHS classifications 1 and 2, and carcinogenic, mutagenic, and reprotoxic substances (CMR), to be phased out by 2024.



6. Overview of Newly Introduced Principles under Volume 4





PILLAR 1: Management

Introduction to the Management Pillar

→ The CmiA Standard defines rules and objectives under the three sustainability pillars of **People**, **Planet**, and **Prosperity**. The challenge is in their implementation. To ensure sustainability, Managing Entities should integrate the requirements of the CmiA standard into their processes. A robust environmental and social management system helps Managing Entities integrate these rules and objectives into their core operations through a set of clearly defined, repeatable processes. This should also result in improvements to their overall operations, benefitting both the Managing Entities and their employees and stakeholders. Management systems need to be scaled to the nature and size of the Managing Entity in order to be effective. They enable Managing Entities to nip potential problems in the bud by foreseeing and addressing issues as they arise.

This is why CmiA criteria include **Management** requirements as a separate pillar. The principles and criteria in the Management pillar formulate the framework within which the performance requirements of the other sustainability pillars can be implemented. They are highly relevant to assuring continuous progress in terms of social, environmental, and economic sustainability.

Without management requirements, continuous improvement might not be effectively implemented or assessed amongst the farmers working with a Managing Entity and for its ginning operations. With a robust management system, a Managing Entity is able to:

- Establish training processes and procedures to ensure compliance with CmiA criteria and indicators
- Collect and analyse data and run a data management system in order to:
 - report required data via the self-assessment to AbTF;
 - assess effectiveness of training;
 - identify risk areas for non-compliance and implement corrective actions, if necessary; and
 - develop and monitor the implementation of the continuous-improvement plan (CIP).
- Ensure that a successful verification is carried out by an independent third party, based on a sound self-assessment of the Managing Entity's performance



PRINCIPLE 1:

CmiA Managing Entities commit to responsible business conduct.

Introduction to the Principle

→ The fundamental premise of Cotton made in Africa is that Managing Entities and farmers respect national and other applicable laws—such as those on human rights, environmental protection, labour relations, and financial accountability—and practise responsible business conduct as defined by the OECD¹.

The first obligation of Managing Entities, as with all businesses, is to comply with national legislation. However, if that legislation sets standards which are below the referenced internationally recognised standards and conventions, the international standards prevail; by contrast, if national legislation sets higher requirements for a specific issue than do international standards, the national legislation shall apply. The aim should always be to provide

the highest possible protection to farmers, workers, and the environment.

In countries without good governance regulations or where respect for national and international legislation is not always enforced, people are left without protection. The Cotton made in Africa standard therefore regards these criteria as fundamental. The formulated criteria also respond to society's expectations as communicated through channels other than the law, e.g. within the workplace or by local communities. Managing Entities that adhere to high standards of responsible business conduct are more likely to bring lasting benefits to contracted farmers, workers, employees, customers, and the societies in which they operate.



CRITERION 1.1

→ The Managing Entity obeys the law and complies with national sectoral policies and codes of conduct.

Intent

The underlying fundamental premise of Cotton made in Africa is that Managing Entities and farmers respect national and other applicable law.

An important aspect of responsible business conduct is fighting corruption. Bribery is a crime, and Managing Entities must do all they can to ensure that risks of bribery and corruption are kept to an absolute minimum. An anti-corruption policy demonstrates a Managing Entity's commitment to preventing bribery and corrupt activities, and all staff should be instructed to familiarise themselves with the information it contains.

Sector associations must follow certain rules and standards that apply to all of their members. These rules are usually codes of best practices and support individual members in their efforts to establish well-functioning structures and procedures. Jointly agreed codes of conduct ensure a level playing field. Pre-competitive knowledge sharing increases sector-wide understanding of trends and new products and services. In addition, training provided by a sector association to its members' staff can help build knowledge and capacity and ensure consistent messaging on agro-technical issues towards contracted cotton farmers, thereby avoiding confusion and promoting the adoption of the training content.

¹ <https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>



INDICATORS

No.	Core	Field	Ginnery
1.1.1	The Managing Entity can prove its legality through an operating licence or a trade registration established by the relevant institution of the respective country of operation.	(✓)	✓
1.1.2	The Managing Entity's operation scheme follows the cotton-sector structure of the respective country. Managing entities operating in concession or exclusivity zones are authorised by the national government of the country of operation.	(✓)	✓
1.1.3	The Managing Entity is a member of the national sectoral association or a similar sector-organising body and adheres to its code of conduct, if any.	(✓)	✓
1.1.4	The Managing Entity has a written anti-corruption policy, which is documented and communicated to all levels of the workforce and operations.	(✓)	✓
1.1.5	The Managing Entity is not involved in any act of corruption, extortion, or embezzlement nor in any form of bribery, including but not limited to the promising, offering, giving, or accepting of any improper monetary or non-monetary incentive.	(✓)	✓
No.	Improvement	Field	Ginnery
1.1.6	The Managing Entity is aligned with national strategies on agriculture, climate change, food/nutrition security, the environment, conservation, labour rights, and any other legislation relevant to its operations.	(✓)	✓

Guidance for Implementation

Managing Entities operating in concession areas or exclusivity zones that are endorsed by the government receive special protection. This means that there is no right of intervention by other actors, especially in the marketing of cotton. Operation in concession areas is thus not contradictory to the competition rules of the OECD guidelines. However, any side-buying of cotton should be considered an infringement of fair business behaviour.

The Managing Entity endorses existing national strategies relevant to its operations and does not contradict them through any of its business activities.

Managing Entities must do all they can to ensure that risks of bribery and corruption are kept to an absolute minimum, including by creating an anti-bribery and corruption policy that demonstrates the Managing Entity's understanding of anti-bribery law and emphasises the Managing Entity's zero-tolerance stance towards bribery. An anti-corruption/anti-bribery policy should outline the Managing Entity's and staff's responsibilities, provide rules about accepting gifts, and offer guidance on avoiding conflicts of interest. Anti-bribery training should be provided, and whistleblowing procedures established with which all staff are familiar.



CRITERION 1.2

→ The Managing Entity respects human rights.

Intent

Cotton made in Africa works with Managing Entities that are committed to the principles of international human rights legislation and to meeting, within their sphere of influence, the responsibility to respect human rights and to translate them into respect for the workers' and farmers' dignity. The commitment to respect human rights constitutes a core element of responsible business conduct.

INDICATORS

No.	Core	Field	Ginnery
1.2.1	The Managing Entity endorses the Universal Declaration of Human Rights.	(✓)	✓

Guidance for Implementation

The Managing Entity has established a policy to respect human rights and legislation and communicates it to CmiA-contracted farmers, workers, and interested parties.

Managing Entities are to sign a Code of Conduct as an integral part of their partnership agreements with CmiA (ATAKORA). This Code of Conduct includes a section regarding respect for human rights and can serve as additional written proof of their commitment to human rights.



CRITERION 1.3

→ The Managing Entity has a comprehensive grievance procedure in place.

Intent

The purpose of a grievance mechanism is to establish a way for individuals, groups, and communities affected by a Managing Entity to contact it, openly or anonymously, if they have an inquiry, a concern, or a formal complaint. Examples include suggestions boxes, a toll-free telephone hotline, an email address, and regular meetings arranged to discuss particular problem areas. A person or a team is assigned to be responsible for receiving, recording, and processing all grievances. A system should be established to communicate decisions taken and progress made on pending actions.

The most important task is to ensure that the grievance mechanism is accessible and trusted. It needs to be tailored to the needs of the local community so that filing complaints is possible for everyone eligible to do so.

INDICATORS

No.	Core	Field	Ginnery
1.3.1(a)	<p>The Managing Entity has a grievance procedure in place which:</p> <ul style="list-style-type: none"> • is accessible to CmiA-contracted farmers who wish to file a complaint; • allows for complaints to be submitted anonymously; • includes a special procedure for cases of sexual harassment (cf. indicator 1.3.5a); • ensures that no plaintiff will be penalised for submitting a complaint; • addresses complaints in a clear and timely manner; • reports fully to the complainant and allows for an appeals process; • ensures that complaints and the corrective actions taken are adequately documented; and • makes complaints available to the verifiers upon request. 	✓	
1.3.1(b)	<p>The Managing Entity has a grievance procedure in place which:</p> <ul style="list-style-type: none"> • is accessible to employees, workers, buyers, suppliers, NGOs, and anyone who wishes to file a complaint; • allows for complaints to be submitted anonymously; • includes a special procedure for cases of sexual harassment; • ensures that no plaintiff will be penalised for submitting a complaint; • addresses complaints in a clear and timely manner; • reports fully to the complainant and allows for an appeals process; • ensures that complaints and any corrective actions are adequately documented; and • makes complaints available to the verifiers upon request. 		✓



No.	Core	Field	Ginnery
1.3.2(a)	The Managing Entity ensures that CmiA-contracted farmers are aware of the grievance mechanism and the arbitration system, understand the procedure(s), and have easy access to the same. CmiA-contracted farmers are informed of the grievance mechanism and/or the arbitration system at the time of contracting.	✓	
1.3.2(b)	The Managing Entity ensures that employees, workers, and external parties are aware of the grievance mechanism and the arbitration system, understand the procedure(s), and have easy access to the same. New employees and workers are informed of the grievance mechanism at the time of recruitment.		✓
1.3.3(a)	The Managing Entity does not discipline, dismiss, or discriminate in any way against CmiA-contracted farmers for using any grievance or arbitration procedure.	✓	
1.3.3(b)	The Managing Entity does not discipline, dismiss, or discriminate in any way against employees or workers for using any grievance or arbitration procedure.		✓
Nr.	Improvement	Field	Ginnery
1.3.4	The Managing Entity has an arbitration system in place to settle disputes with CmiA-contracted farmers. This arbitration system can be either a part of the grievance mechanism or a separate mechanism.	✓	
1.3.5(a)	The Managing Entity ensures that grievances regarding sexual harassment reported by CmiA-contracted farmers are referred to specially appointed women or women's committees, including a female senior manager if possible, with direct access to the chief executive. The same principles apply to cases of sexual harassment of groups other than women.	✓	
1.3.5(b)	The Managing Entity ensures that grievances regarding sexual harassment reported by employees and workers are referred to specially appointed women or women's committees, including a female senior manager if possible, with direct access to the chief executive. The same principles apply to cases of sexual harassment of groups other than women.		✓

Guidance for Implementation

Most countries have specific national legislation in place making abuse in the workplace a criminal offence and have an institutionalised system of labour inspection (in accordance with ILO Convention 81) establishing fair and transparent complaint procedures for workers. Verifiers must check guidelines for transparent complaint procedures against the national legislation concerning labour inspections.

Complaints from workers or their representatives against their employer should preferably be handled within the Managing Entity. Under the framework of ILO Conventions

87 and 98 (Freedom of Association and Collective Bargaining), internal communication channels between employees and the management should be created and should include a procedure for handling complaints. To address workers' concerns, a grievance mechanism and complaint resolution procedures need to be implemented and made accessible to both permanent and temporary staff.

In addition, CmiA-contracted farmers must be made aware of and have easy access to a grievance mechanism established by the Managing Entity. Farmers need



to be able to contact the Managing Entity, openly or anonymously, to pose their questions, to express concerns, or to file a complaint. A person or a team within the Managing Entity should be assigned for receiving, recording, and processing all grievances. A system for communicating decisions taken and progress made on pending actions should be established so that people filing a complaint know when they can expect a response.

An additional step in a comprehensive grievance mechanism is to systematically engage with local communities and other stakeholders affected by the Managing Entity's operations. This helps build trust, credibility, and local support while also providing the opportunity to highlight the positive aspects of the Managing Entity's presence. Engagement can be prioritised based on the nature and severity of the impacts the Managing Entity might have. Engagement

should be stronger and more frequent with the groups that are more severely affected. To effectively engage with each group, communication material and methods can be tailored to address issues that may affect or interest them in particular.

Regardless of who filed a complaint—be it a staff member, a contracted farmer, or another stakeholder—it needs to be understood that not all complaints can be resolved in the same way. Simpler issues might be dealt with by the same team responsible for registering the complaint. More complex problems might require immediate intervention by senior managers and more dedicated resources for investigating, documenting, and reporting. For complex and recurring problems, third-party facilitators could come into consideration as independent mediators. The more serious a claim is, the more independent the mechanism should be.





PRINCIPLE 2:

CmiA Managing Entities are committed to CmiA values and continuously improve their CmiA performance.

Introduction to the Principle

CmiA considers the Managing Entity to be the principal actor and agent of change for implementing the CmiA standard. CmiA core values are to help farmers help themselves through trade while promoting sustainable development, protecting the environment, and preserving future generations' livelihoods. Cotton made in Africa expects Managing Entities to share these values and to transparently communicate about these values as well as their partnership with CmiA.

Because cotton cultivation and ginning, as the first processing step, present a multitude of challenges, CmiA follows a continuous-improvement approach from the

very beginning. While it is obvious that often unfavourable framework conditions—from weak governance to climatic or other environmental influences beyond the control of a Managing Entity—make it difficult to always follow best practices, the initiative strives to get as close as possible. The CmiA initiative and Managing Entities are on a journey, and we are learning together. It is our aim to continuously improve our understanding of challenges and success factors so that we can adapt our approaches in order to achieve the best possible results. This commitment is reflected in the continuous-improvement plans that form an integral part of the verification process.



CRITERION 2.1

→ The Managing Entity ensures an effective CmiA verification process.

Intent

To assess compliance and the state of progress regarding the CmiA criteria and indicators, the CmiA assurance scheme is based on regular, independent third-party verification missions at the field and ginnery levels. A CmiA certificate can only be obtained through a successfully completed verification cycle.¹

Managing Entities agree that their facilities, production sites, and the cotton fields of contracted farmers are subject to investigation measures undertaken or commissioned by AbTF.

¹ Rules for the accreditation of verification bodies and verifiers as well as for the procedures of conducting the verifications are described more thoroughly in the CmiA Assurance System document.



INDICATORS

No.	Core	Field	Ginnery
2.1.1(a)	The Managing Entity provides sufficient and appropriate assistance to the verifiers in order to ensure efficient and effective field-level verification. This includes the provision of staff with local geographical knowledge as well as transportation and logistical support.	✓	
2.1.1(b)	The Managing Entity provides sufficient and appropriate assistance to the verifiers in order to ensure efficient and effective ginnery-level verification. This includes the provision of staff with local geographical knowledge as well as transportation and logistical support in cases where several ginneries are subject to ginnery-level verification.		✓
2.1.2(a)	The CmiA focal person participates in the field-level verification, including the opening and closing meetings.	✓	
2.1.2(b)	The CmiA focal person participates in the ginnery-level verification, including the opening and closing meetings.		✓
2.1.3(a)	The Managing Entity agrees that confidential interviews with CmiA-contracted farmers, all randomly chosen by the verifiers, are conducted without any influence from the Managing Entity.	✓	
2.1.3(b)	The Managing Entity agrees that confidential interviews with employees, workers, and employee/worker representatives, all randomly chosen by the verifiers, are conducted without any influence from the Managing Entity.		✓
2.1.4	Trade union representatives and/or elected worker representatives are invited by the Managing Entity to delegate at least one representative to participate in the verifications, including the opening and closing meetings, in order to increase worker involvement in and understanding of the compliance process. Worker participation in verifications takes place during working time, and it is ensured that workers do not lose income.		✓

Guidance for Implementation

Regular verification missions take place on an annual basis, with a verification mission at the field level being conducted one year and a verification mission at the ginnery level the following year. To be granted a CmiA certificate permitting sales under the CmiA label, both third-party verification missions must have been

completed successfully, constituting one verification cycle. The CmiA certificate is awarded to the Managing Entity by AbTF, which administers the standard. This can only occur if the third-party verifiers confirm successful field-level and ginnery-level verifications. CmiA certificates are granted for a maximum duration of two years.



CRITERION 2.2

→ The Managing Entity communicates CmiA values to CmiA-contracted farmers, employees, and ginnery workers.

Intent

The CmiA initiative wants to collaborate with Managing Entities that share the same values and that want to make positive social, economic, and environmental contributions exceeding their legal obligations. CmiA therefore expects Managing Entities to present themselves as CmiA partners to employees, contracted farmers, and the public and to communicate their common values.

INDICATORS

No.	Improvement	Field	Ginnery
2.2.1(a)	The Managing Entity displays its commitment to CmiA in public workplaces (e.g. input distribution centres) in languages or pictograms understandable to all CmiA-contracted farmers.	✓	
2.2.1(b)	The Managing Entity displays its commitment to CmiA in public workplaces (e.g. a ginnery or the head office) in languages or pictograms understandable to all employees and workers.		✓

Guidance for Implementation

The Managing Entity displays its commitment to CmiA in a public workplace and ensures that all workers and contracted farmers are aware of this commitment by posting it in languages or pictograms understandable to

all. This includes workers and farmers who are illiterate or who speak languages other than the main language of the workplace.



CRITERION 2.3

→ The Managing Entity regularly assesses risks of non-compliance with CmiA and implements corrective actions.

Intent

The Managing Entity has the capacity and has made the commitment to act diligently in assessing actual and potential adverse impacts of their business against the values and principles of the CmiA standard, identifying for itself where the most significant risks for these adverse effects may occur and acting upon them with the aim of preventing and/or addressing them in line with the CmiA standard. The Managing Entity takes all reasonable and appropriate measures within its purview that are needed to implement the CmiA Standard.

The Managing Entity gathers and assesses reliable information about its responsible behaviour and keeps the necessary documentary evidence that it has acted diligently. It seeks further detail on the root cause of any discrepancy with the principles and criteria of the CmiA standard and takes the necessary corrective actions.

INDICATORS

No.	Core	Field	Ginnery
2.3.1(a)	The Managing Entity annually carries out a risk assessment to identify possible risks of non-conformity with CmiA core indicators at the field level.	✓	
2.3.1(b)	The Managing Entity annually carries out a risk assessment to identify possible risks of non-conformity with CmiA core indicators at the ginnery level.		✓
2.3.2(a)	If risks of non-conformity at the field level are identified, the Managing Entity plans and implements corrective action to address the risks.	✓	
2.3.2(b)	If risks of non-conformity at the ginnery level are identified, the Managing Entity plans and implements corrective action to address the risks.		✓

Guidance for Implementation

The primary objective of a risk assessment is to identify potential social and environmental risks¹ so that the Managing Entity can develop appropriate strategies for addressing the risks and potential negative impacts. Managing Entities need to have effective mechanisms in place to plan and implement appropriate corrective actions.

Key considerations for a robust risk assessment include:

- Assessment is done in regular intervals, at least once a year
- Assessment is conducted any time there are significant changes to operations
- Assessment is conducted any time there are external changes, such as new laws and regulations
- Assessment covers labour, occupational health and safety (OHS), environmental, and community risks
- Assessment evaluates and prioritises risks according to both their probability and the severity of negative impacts
- Assessment links monitoring plans to prioritised risks
- Assessment includes input from all levels of managers, workers, contracted farmers, affected communities, and—as far as possible—from other external stakeholders

¹ At minimum, this includes the social and environmental aspects covered by the CmiA standard. However, a broader risk assessment should be considered compliant to this criterion by verifiers, as it shows that the Managing Entity is performing at the best-practice level regarding human rights and environmental due diligence.



CRITERION 2.4

→ The Managing Entity ensures subcontractor compliance with the CmiA standard.

Intent

At ginneries, certain activities and services may be carried out by subcontractors, such as security services or canteen operations. The Managing Entity has to ensure that the employees of these third parties enjoy the same level of protection and that the subcontractor complies with the requirements set out in the CmiA standard.

INDICATORS

No.	Core	Field	Ginnery
2.4.1	<p>In cases where the Managing Entity engages workers contracted by third parties, the Managing Entity will take commercially reasonable efforts to ascertain that the third parties who contract these workers are reputable and legitimate enterprises and comply with criterion 1.3 (grievance mechanism) and the labour and environmental responsibilities for ginneries laid down in this standard.</p> <p>At minimum, the actions the Managing Entity must undertake to fulfil this requirement include:</p> <ul style="list-style-type: none"> Effectively communicating the requirements of this standard to the senior leadership of third parties Assessing significant risks of non-compliance by third parties Working to ensure that these significant risks are effectively addressed by third parties and the Managing Entity Undertaking commercially reasonable efforts to incorporate the requirements of the CmiA standard in contractual agreements with third-party employers <p>The Managing Entity records how these actions are fulfilled.</p>		✓

Guidance for Implementation

The Managing Entity should have an overview of subcontractors at hand and be able to demonstrate how the CmiA standard has been communicated to third parties and, where possible, to show where in contractual

agreements the CmiA requirements have been incorporated, with a special focus on an existent grievance mechanism for employees of third parties.



CRITERION 2.5

→ The Managing Entity must develop and implement a continuous-improvement plan.

Intent

Managing Entities work in a target-oriented way and formulate measures to improve weaknesses identified during a verification, either at the field or the ginnery level. The implementation of these measures is assessed during the next verification.

INDICATORS

No.	Core	Field	Ginnery
2.5.1(a)	Taking the verification findings at the field level into account, the Managing Entity develops a continuous-improvement plan (CIP), defining actions that are then implemented, documented, and monitored. The CIP is reviewed and updated annually.	✓	
2.5.1(b)	Taking the verification findings at the ginnery level into account, the Managing Entity develops a continuous-improvement plan (CIP), defining actions that are then implemented, documented, and monitored. The CIP is reviewed and updated annually.		✓
No.	Improvement	Field	Ginnery
2.5.2(a)	The field-level continuous-improvement plan (CIP) is shared with and understood by top management, relevant operational staff (e.g. focal persons for OHS, gender equality, child labour), and any representatives of CmiA-contracted farmers.	✓	
2.5.2(b)	The ginnery-level continuous-improvement plan (CIP) is shared with and understood by top management, relevant operational staff (e.g. focal persons for OHS and gender equality), and any worker and employee representatives.		✓

Guidance for Implementation

Continuous-improvement plans (CIPs) and the monitoring of their implementation represent an important tool for continuous learning. Based on the previous CIP, verifiers can assess the qualitative progress of the Managing Entity from one verification to the next.

Elaboration of the Continuous-Improvement Plan (CIP)

Based on the outcomes of the verification findings as well as the experience shared by the verifiers, the Managing Entity should be able to identify and prioritise its most important areas for improvement and to define corrective

or improvement activities to progressively implement more sustainable practices.

Identified improvement opportunities as well as defined activities and responsibilities are laid down in the Managing Entity's continuous-improvement plan (CIP).

The ownership and responsibility for the CIP lies with the Managing Entity, which defines its own improvement priorities and implementation measures. However, without the submission of the CIP by the Managing Entity and



its subsequent validation by AbTF, a verification cannot be considered successfully completed, and a CmiA certificate for the Managing Entity cannot be issued. The validated CIP needs to be uploaded into the CmiA Assurance Platform and put as annex into the respective final verification report.

Validation of the CIP

To ensure that the Managing Entity's priorities are in line with the requirements of the CmiA standard and that AbTF can identify common topics which need special attention and can support Managing Entities as a group, it is the role of AbTF to validate the respective CIP of the verified Managing Entity.

Evaluation of the CIP Implementation

Based on the CIP that has been integrated into the previous CmiA verification report, verifiers assess the progress realised by the Managing Entity since the last verification. They check whether the objectives and measures that the Managing Entity has defined in the previous CIP have been accomplished and to what extent progress could be made.

Depending on the measures formulated, progress can be assessed during the management interview and document check, during field or ginnery observations, and during interviews with farmers or ginnery staff.





PRINCIPLE 3:

CmiA Managing Entities operate effective management systems.

Introduction to the Principle

Good management is essential for the implementation and monitoring of CmiA criteria and indicators. It is also an important tool for facilitating planning and decision-making processes.

CmiA considers the Managing Entity to be the principal actor and agent of change for implementing the CmiA standard. It is therefore obvious that the Managing Entity bears the responsibility for compliance with the requirements of CmiA criteria and indicators and for translating the requirements into practice. Guidance from the CmiA standard as well as other documents provided by AbTF—such as picture blocks, posters, videos, and the like—can be used as a best practice.

An effective management system specifies repeatable steps that Managing Entities implement to achieve their goals and objectives—with regard to the CmiA standard and beyond—and to create a culture that engages in a continuous cycle of monitoring, (self-)evaluation, and the correction and improvement of operations and processes through heightened employee awareness and management leadership and commitment. Benefits to the Managing Entity include a more efficient use of

resources, improved protection of people and the environment, and increased capability to deliver consistent and improved services and products (towards contracted farmers and buyers of lint cotton).

The level of complexity of the management system will depend on the particular circumstances of each Managing Entity. For some, especially smaller ones, it may simply mean having strong leadership from the owner, providing a clear definition of what is expected from each individual employee, and explaining how they contribute to the Managing Entity's overall objectives, without the need for extensive documentation.

However, in order to comply with CmiA requirements and its assurance mechanism, the organisation, documentation, and evaluation of training activities are essential components of an effective management system for all Managing Entities. In addition, it is of equal importance to collect, compile, maintain, and report relevant data (at both the field and ginnery levels) in the annual self-assessment via the CmiA Assurance Platform together with an assessment of the Managing Entity's performance regarding the CmiA standard's criteria and indicators.

Intent

A functional organisational structure is the basic requirement for the Managing Entity to prove that policies and procedures are effective and that, for example, training is provided to all CmiA-contracted farmers.

Employees are a key determinant of a Managing Entity's success and are often the Managing Entity's "face" to contracted farmers and other stakeholders. A well-trained, well-qualified workforce is critical for implementing the CmiA standard. Top management plays an integral role by hiring an adequate number of staff, building up employees' capacities, and creating an efficient work environment. Senior management needs to ensure that the person or team that takes responsibility for CmiA and related issues complies with reporting duties and receives sufficient time and authority to carry out the work involved.

CRITERION 3.1

→ The Managing Entity has the necessary staff capacity to implement the CmiA standard.



INDICATORS

No.	Core	Field	Ginnery
3.1.1(a)	The Managing Entity has a chart indicating the identities and roles of all persons responsible for the implementation of the CmiA standard at the field level. This includes all focal persons appointed under indicators 3.1.2 and 3.1.3(a).	✓	
3.1.1(b)	The Managing Entity has a chart indicating the identities and roles of all persons responsible for the implementation of the CmiA standard at the ginnery level. This includes all responsible persons appointed under indicators 3.1.2(b) and 3.1.3(b).		✓
3.1.2	<p>The Managing Entity has appointed a person responsible for CmiA matters, called the CmiA focal person.</p> <p>The CmiA focal person is in charge of:</p> <ul style="list-style-type: none"> the overall coordination of CmiA matters in the entity at the field and ginnery levels; handling all necessary CmiA-related communication; acting as a liaison between AbTF, the lead verifier, managers, employees, and representatives of CmiA-contracted farmers regarding CmiA matters; the submission of annual self-assessments and annual continuous-improvement plans at the field level; and overseeing compliance, implementation, and monitoring of the Managing Entities' performance regarding the CmiA requirements at the field level. <p>The CmiA focal person reports directly to or is a member of the senior management. The above tasks are included in the employment contract or job description of the CmiA focal person. The CmiA focal person has the relevant knowledge and experience to perform the described tasks.</p>	✓	
3.1.3(a)	<p>One or more responsible persons or a committee are appointed for the following issues with relevance for CmiA at the field level:</p> <ul style="list-style-type: none"> Farming practices Working conditions Gender equality Fibre quality The environment <p>The responsible persons are competent, knowledgeable on the subject matter, and accessible to field extension staff and to representatives of CmiA-contracted farmers; the responsible persons have the resources (time and budget) to implement their tasks.</p>	✓	
3.1.3(b)	<p>One or more responsible persons or a committee are appointed for the following issues with relevance for CmiA at the ginnery level:</p> <ul style="list-style-type: none"> Working conditions Gender equality Fibre quality The environment <p>The responsible persons are competent, knowledgeable on the subject matter, and accessible to employees and workers; the responsible person have the resources (time and budget) to implement their tasks.</p>		✓



Guidance for Implementation

Organisational structure provides guidance to all employees by laying out the official reporting relationships that govern the workflow of the Managing Entity. Structure will give employees more clarity, help manage expectations, enable better decision making and provide consistency. Organisational charts assign responsibility, organise workflow, and ensure that important tasks are completed on time.

With regard to the implementation of the CmiA standard, it is essential to have a least one person appointed to be responsible for CmiA matters, called the CmiA focal person.

This ensures a direct, targeted, and efficient line of communication between AbTF and the Managing Entity. The focal person must either directly report to or be part of the senior management team and have the relevant knowledge and experience to fulfil this task. However, it is **not** mandatory that responsibility for CmiA matters be the only task assigned to the focal person.

In addition, the organisational chart needs to list the person(s) or committees responsible for specific field- or ginnery-level issues, such as farming practices or working conditions.





CRITERION 3.2

→ The Managing Entity ensures that CmiA-contracted farmers regularly receive professional training.

Intent

Managing Entities have a close and direct relationship with contracted farmers or farmers' groups. Extension agents employed by the Managing Entity provide farmers with agricultural training on all essential topics for cotton cultivation, such as Integrated Production and Pest Management (IPPM) or soil conservation, thereby helping transfer knowledge and introduce innovative technologies and methods to small-scale farmers.

All training programmes should be defined with respect to the following aspects:

- Training programmes are developed based on the needs of the target groups and the results of previous verifications.
- The training material and methods used are adapted to the context, and training is implemented at appropriate educational levels and with cultural characteristics that enable effective communication with the target groups.
- The training model used is adapted to transfer knowledge to all individual farmers. This can be done through a "cascade", a Training of Trainers (ToT) model, or through the establishment of demonstration plots and the nomination or election of lead farmers. While training approaches may diverge from region to region, they should always be adapted to the way in which practices can best be transmitted to the farmers or the farmers' groups.
- Training is documented, and success is measured through the adoption of recommended practices.

Depending on the needs observed, training contents can diverge and should evolve. Some basic training, like good agricultural practices, does not need to be given every year if it is evident that the farmers are already applying the training material. Instead, it should only be refreshed as needed.

Training in fundamental business skills also contributes to a better standard of living, as farmers are assisted in drafting a simple business plan for their small farm. In addition to minimising occupational hazards, training relating to IPPM and the safe use of pesticides can also show farmers methods to reduce their expenses, e.g. when molasses traps and pest scouting lead to less frequent application of pesticide sprays.



INDICATORS

No.	Core	Field	Ginnery
3.2.1	Extension services for CmiA-contracted farmers are in place. The service structure is documented and updated on an annual basis at minimum (including with regard to the extension hierarchy, the number of people per hierarchy level, and the number of farmers per extension agent).	✓	
3.2.2	Extension officers receive regular training in agricultural best practices, new developments (content), and teaching practices (didactics). Their training is documented.	✓	
3.2.3	A training plan for the field level is available and implemented. It covers training topics, target groups, the training schedule, and the expected number of participants.	✓	
3.2.4	<p>Training materials for CmiA-contracted farmers are available, focussing on key sustainability issues in the local context. The foundation is provided by training material for the following topics:</p> <ul style="list-style-type: none"> • Good agricultural practices (GAP) • IPPM, including scouting and threshold spraying • The safe storage, use, and disposal of (<i>organic</i>) pesticides (organic in brackets refers to the CmiA-Organic standard) • Soil and water conservation • Child labour • Gender equality • Farm-business training • Good management techniques for the harvest and storage of seed cotton 	✓	
3.2.5	To document the implementation of the training plan, the Managing Entity reports annual data on the CmiA-contracted farmers trained, with these data including the number of attendees, their gender, and the training topic.	✓	
3.2.6	<p>The Managing Entity evaluates the training conducted and its effectiveness by:</p> <ul style="list-style-type: none"> • seeking participant feedback on completed training (e.g. regarding the format, content, and follow-up mechanisms); • assessing and documenting to what extent the training results in practical changes; and • evaluating the training materials continuously to improve their content and delivery. 	✓	
No.	Improvement	Field	Ginnery
3.2.7	CmiA-contracted demo/lead farmers receive regular training in agricultural best practices and new developments (content) as well as teaching practices (didactics). The training is documented.	✓	



Guidance for Implementation

Approaches for Good Agricultural Practices (GAP) training can diverge and are also regionally different. In eastern and southern Africa, basic agricultural practices are mainly transmitted via the “five finger approach” (cf. criterion 11.1).

Learning systems and learning groups are a very good practice for learning and transmitting knowledge and practical skills. Depending on regional or local preferences, these learning groups can be established by the farmers themselves or with the support of the Managing Entity. They can take the form of field schools, cotton clubs, farmer cooperatives, etc. Additionally, they can use demo plots and “lead farmers”, “pilot farmers”,

or “teacher farmers” (i.e. different terms for facilitators) to organise the transfer of knowledge and practical skills. Training local farmers as facilitators is a best practice method for anchoring the CmiA approach within the community and at the sub-district level. It leads to higher levels of success as farmers are motivated to share knowledge and useful skills.

Guidance on Demo Plots (if used)

Demo plots include the cultivation of rotation crops and demonstrations of how to grow a healthy, safe, and nutritious crop. If in use, demo plots and access to trainers (e.g. lead/pilot farmers) should be located within a reasonable distance for the contracted farmers.





CRITERION 3.3

→ The Managing Entity ensures that staff and ginnery workers regularly receive professional training.

Intent

Similarly to field operations, ginnery staff must be well-trained and well-qualified to perform at best practice levels. Staff members need to be aware of existing procedures and understand why they are important to follow. They also need the skills and knowledge to be able to implement them. This is achieved through routine communication and effective training.

For example, the HR department manages training needs related to labour aspects; production focusses on the more efficient use of resources and the reduction of waste; and maintenance ensures that the equipment runs efficiently and that emergencies are contained.

INDICATORS

No.	Core	Field	Ginnery
3.3.1	A training plan for the ginnery level is available and implemented. It covers training topics, target groups, the training schedule, and the expected number of participants.		✓
3.3.2	Suitable training materials are available and are based on the following topics: <ul style="list-style-type: none"> • Health and safety in ginneries • Gender equality • Grievances • Waste management 		✓
3.3.3	To document the implementation of the training plan, the Managing Entity reports annual data on the ginnery workers and employees trained, with these data including the number of attendees, their gender, and the training topic.		✓

Guidance for Implementation

Training modules should have defined goals, e.g. aiming to build awareness, to boost commitment, or to give people necessary knowledge and skills. At minimum, the training curriculum should cover grievances, gender equality, health and safety, and waste management.

Health and safety training includes the identification of workplace hazards and how to avoid job site risks. Before work shifts, frequent toolbox training—i.e. regarding specific assignments and equipment—refreshes workers' knowledge of hazards and accident avoidance.



CRITERION 3.4

→ The Managing Entity operates a data-management system.

Intent

It is the responsibility of the Managing Entity to demonstrate results through the annual collection of field-level and ginnery-level data. CmiA uses self-assessments as a key component of its assurance system. The Managing Entity has the duty to report and assess its performance. The self-assessment serves as a tool for the verifiers to define the most important risks regarding non-compliance with CmiA requirements and to develop the verification plan. For Managing Entities, the self-assessment serves as a reflection tool regarding the progress of implementation of the CmiA standard, as it assesses and comments on its own progress.

To assess and monitor the impact of CmiA, AbTF needs a reliable set of data. Through the self-assessment, the Managing Entity annually submits data that are relevant for processes like calculating the environmental footprint of CmiA cotton production or comparing the evolution of production data.

INDICATORS

No.	Core	Field	Ginnery
3.4.1(a)	<p>The Managing Entity has a system in place to accurately collect and maintain the following information on CmiA-contracted farmers and farmer groups:</p> <ul style="list-style-type: none"> • Name • Location • Gender • Age • Area under cotton cultivation • Inputs provided (type and amount) • (Input) pre-finance amount and repayment • Seed cotton at market • Training participation <p>The data are updated annually.</p>	✓	
3.4.1(b)	<p>The Managing Entity has a system in place to maintain adequate records of employment. This includes the following:</p> <ul style="list-style-type: none"> • A personnel file for each employee and worker • Pay records • Records of hours worked • Workforce statistics • Union agreements • Policies • Health and safety • Labour providers 		✓
3.4.2	<p>The Managing Entity has a system in place to collect, compile, and report complete and accurate data at the field and ginnery levels in accordance with the data reporting template in the CmiA Assurance Platform.</p>	✓	



Guidance for Implementation

The self-assessment must be completed annually by each Managing Entity in the CmiA Assurance Platform of the Aid by Trade Foundation and be validated by the latter. AbTF grants assigned verifiers access to the Managing Entity's self-assessment for a certain period of time before the start of a verification mission.

The self-assessment must be submitted with relevant

documentation such as written policies and procedures, maps, or certificates. Data on inputs used on cotton fields, yields achieved, and information related to the prices need to be submitted every year.

Comments explaining the assessments in the Assurance Platform are very helpful and should be used as additional preparation.



CRITERION 3.5

→ The Managing Entity follows AbTF rules regarding the chain of custody, especially with respect to the preservation of traceability and the marketing of CmiA cotton or CmiA-Organic cotton.

Intent

Only seed cotton from CmiA-contracted farmers is considered to be CmiA cotton and may be sold as such by the Managing Entity if processed in a CmiA-verified ginnery. If the Managing Entity works with both CmiA-contracted and non-CmiA farmers, or if the ginnery processes different types of cotton, it is essential that CmiA cotton be separated from non-CmiA cotton at all stages to ensure that there is no mixing of products. Traceability from the farm level up to the ginnery is essential for ensuring the credibility of the CmiA sustainability claim and for confirming the impact of the implemented sustainability practices.

INDICATORS

No.	Core	Field	Ginnery
3.5.1	Cotton marketed by the Managing Entity as CmiA cotton is produced by and bought from CmiA-contracted farmers. In cases where only some of the farmers are taking part in the CmiA programme, the Managing Entity ensures the separation of CmiA cotton from non-CmiA cotton. If necessary, a separation system is put into place, applied, and documented at all stages.	✓	
3.5.2	Cotton marketed by the Managing Entity as CmiA cotton is processed in CmiA-verified ginneries. If necessary—e.g. in the event of (a) toll ginning by or for another entity or (b) partial ginnery participation in the CmiA programme—the Managing Entity ensures the separation of CmiA cotton from non-CmiA cotton. A separation system is put into place, applied, and documented at all stages from the harvest to the baling of lint cotton.		✓



No.	Core	Field	Ginnery
3.5.3	The Managing Entity ensures that all CmiA-contracted farmers or farmer groups at market receive company receipts for purchases of their seed cotton, including the seller's name, the date, the volume, the received payment amount, and any deductions/loan repayments made regarding the provided inputs. The Managing Entity maintains copies of these receipts for at least one year and is able to submit these purchase records to AbTF or the verifiers upon request.	✓	
3.5.4	The Managing Entity collects sales records of lint cotton to international traders and/or local spinning or textile mills, including the buyer's name, the date, and the volume, keeping these records for at least one year. The Managing Entity is able to submit these sales records to AbTF upon request.		✓
3.5.5	For CmiA-Organic ONLY: Cotton marketed by the Managing Entity as CmiA-Organic cotton is produced and bought from CmiA-contracted farmers under an organic certification scheme. In cases of partial farmer participation in the CmiA-Organic programme, the Managing Entity ensures the separation of CmiA-Organic cotton from CmiA cotton and from non-CmiA cotton. If necessary, a separation system is put into place, applied, and documented at all stages.	✓	

Guidance for Implementation

Which farmers are “CmiA-contracted farmers”?

The Managing Entity makes the ultimate decision about who becomes a CmiA-contracted farmer. The term “CmiA-contracted farmers” can refer either to all contracted farmers or to farmer groups contracted by a Managing Entity. It is also possible for CmiA-contracted farmers to be farmers who have been personally selected to participate in CmiA. The status of CmiA-contracted farmers must be regularly confirmed through successful third-party field-level verifications.

Which ginneries are CmiA ginneries?

The Managing Entity makes the ultimate decision about which ginneries become part of the CmiA programme. Only regularly verified ginneries can be part of the CmiA unit.

Bales of lint cotton produced at a CmiA ginnery are “hard identity” cotton, meaning that traceability back to the point of purchase (e.g. villages or buying stations) must be ensured.

Toll Ginning / Subcontracting

If ginneries not owned by the Managing Entity are subcontracted for the toll ginning of CmiA cotton, these ginneries must also achieve CmiA-verified status in order for this cotton to be marketed under the CmiA label. In this case, and in cases where a CmiA ginnery is subcontracted for the toll ginning of non-CmiA cotton, seed and lint cotton from CmiA-contracted farmers must be segregated from non-CmiA cotton. Segregation may be physical (e.g. through separate production lines) or temporal (e.g. through separate production runs).

Toll ginning or subcontracting operations are also subject to a document review, e.g. of the production manual and the subcontracting agreement.

When subcontractors are used, e.g. for transport, the respective Managing Entity must demonstrate that the same segregation procedures as detailed above are implemented. The inclusion of subcontractors in the verification is at the discretion of the lead verifier, particularly in the case of reasonable doubt regarding compliance.



PILLAR 2: People

Introduction to the People Pillar

→ CmiA aims to improve the living conditions of African small-scale cotton farmers and their families and therefore strives to ensure fair and decent working conditions for cotton farmers and ginnery staff. Employment creation, social protection, rights at work, and social dialogue with gender equality as a crosscutting objective are the pillars of the International Labour Organisation (ILO) Decent Work Agenda¹ and give guidance in the formulation of the CmiA requirements. As part of this Decent Work Agenda, the ILO core labour standards must be complied with as outlined in the various core indicators under the People pillar of CmiA. This applies at both the field and ginnery levels.

CmiA Managing Entities are mostly active in remote rural areas and are often referred to as the principal agents of change towards sustainability for cotton farmers and ginnery workers. Ginneries are usually located close to the cotton cultivation areas and present important—often one of the few—sources of temporary employment for the population during the cotton ginning season.

From a due diligence perspective, the CmiA standard pays particular attention to the following aspects:

- Prohibition of forced labour and child labour

- Non-discrimination and a respectful working environment
- Fair labour conditions, including freedom of association
- A secure and healthy working environment

Sustainable development is universal in scope and calls for no-one to be left behind. Achieving gender equality and women's empowerment is integral to accomplishing defined sustainability goals. In Sub-Saharan Africa, women are often more affected by economic crises, lack of health care, and other problems while also bearing the primary responsibility for nutrition, childcare, household management, water and fuel collection, and more. While their burden is often disproportionately high, women are underrepresented in solving challenges despite their ideas and leadership. Therefore, the CmiA standard pays special attention to gender equality and the empowerment of women.

Children are the basis for all dimensions of sustainable development. They have the right to thrive, develop to their full potential, and live in a sustainable world. It is therefore self-evident for CmiA to specifically address the rights of children in its standard.

¹ For more details, please visit ILO's website at <https://www.ilo.org/global/topics/decent-work/lang--en/index.htm>



PRINCIPLE 4:

CmiA Managing Entities support small-scale farmers.

Introduction to the Principle

In many African countries, economic growth depends on an efficient agricultural sector, and cotton production can play an important role in this. According to the International Cotton Advisory Committee (ICAC), Sub-Saharan African countries export more than 90 percent of the raw cotton lint they produce, and about 3.7 million small-scale farmers in Sub-Saharan Africa, often in remote and structurally weak areas, depend on income from cotton cultivation. In total, more than 20 million people in the region directly or indirectly live from cotton.

However, poor access to services, unfavourable policy frameworks, and a lack of knowledge regarding sustainable

cotton production serve to weaken the contribution of the cotton sector to economic development and poverty reduction in the region.

CmiA Managing Entities work with small-scale farmers on a contract basis, either through individual contracts or contracts with farmers' groups. Managing Entities can assist associated small-scale farmers in improving crop quality, quantity, and sustainability by providing essential services such as agricultural training and access to agricultural inputs, pre-financing, and markets, thereby providing cash income and even supporting communities in their development.



CRITERION 4.1

→ The Managing Entity supports small-scale and family farmers.

Intent

Managing Entities rely on and work with small-scale and family farmers. This implies that all farmers are contracted either individually or as part of farmers' groups. Small-scale farmers rely on family, household, or community labour instead of hired labour.



INDICATORS

No.	Core	Field	Ginnery
4.1.1	<p>At least 95 percent of CmiA-contracted cotton farmers are small-scale farmers who meet all of the following requirements:</p> <ul style="list-style-type: none"> • The area cultivated with cotton is below 20 hectares • Farm work, or at least the vast majority of it, is done by the cotton farmer, the farmer's family, or the community • There are no year-round paid workers <p>In addition, at least 90 percent of the total cotton area cultivated by the contracted farmers of a Managing Entity belongs to farmers cultivating a cotton area of less than 20 hectares.</p>	✓	
4.1.2	<p>Any CmiA-contracted farmers with a cotton cultivation area exceeding 20 hectares create and maintain a record of their farm-labour force (temporary and permanent), including estimates of the number of workers, broken down by gender. This record is updated annually, no later than one month after the cotton is sold.</p>	✓	

Guidance for Implementation

Regarding the size of cotton fields, it is acceptable for farm sizes to be aggregated at the management level or in the records for each group of farmers instead of at the individual farmer level. If applicable, verifiers can check if more precise information regarding the collected data is available at the extension staff level. The means of measuring cotton field size should be indicated, e.g. whether GPS data is available.

A smallholder or small-scale farm is a farm that primarily relies on family or household labour or on a reciprocal workforce exchange with other members of the community. Temporary workers can be hired during limited periods of the harvest season. Specific services, such as land preparation by tractor, may be provided by the Managing Entity or other third parties.



PRINCIPLE 5:

CmiA Managing Entities promote decent working conditions throughout all field and ginning operations.

Introduction to the Principle

CmiA follows the concept of decent work, as developed by the International Labour Organisation (ILO), which involves opportunities for work that is productive and delivers a fair income; security in the workplace; social protection for families; better prospects for personal development and social integration; freedom for people to express their concerns, to organise, and to participate in the decisions that affect their lives; and equality of opportunity and treatment for all women and men.

The ILO is the authoritative international body on employment and labour issues and has developed international labour standards. With its Declaration on Fundamental Principles and Rights at Work¹, the ILO identified eight of its conventions as fundamental, covering four categories:

- Freedom of association and the effective recognition of the right to collective bargaining
- The elimination of forced or compulsory labour
- The abolition of child labour
- The elimination of discrimination in respect of employment and occupation

The eight fundamental conventions are:

1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
3. Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)
4. Abolition of Forced Labour Convention, 1957 (No. 105)

5. Minimum Age Convention, 1973 (No. 138)
6. Worst Forms of Child Labour Convention, 1999 (No. 182)
7. Equal Remuneration Convention, 1951 (No. 100)
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

CmiA intends to ensure that relations between CmiA Managing Entities and contracted farmers as well as any employed staff—including permanent, seasonal, and casual workers—are based on fair principles and are in compliance with these core labour standards, other international conventions, and national labour legislation. Workers are to be provided with understandable information about their rights, responsibilities, and employment conditions, including working hours, remuneration, and terms of payment.

The first stage of cotton transformation, which is the ginning of cotton, is usually performed by the Managing Entity. It takes place directly in the regions of cotton cultivation and is a seasonal activity linked to the cotton production cycle. As it is an objective of CmiA to improve the living conditions of farmers and their families, there is also a clear interlinkage with the people actively involved in the ginning of cotton. In rural areas, which often lack employment and formal income opportunities, cotton ginneries are—at least on a seasonal basis—one of the most important employers, offering additional income generating possibilities to the rural population outside the crop production cycle.

¹ Available at: <https://www.ilo.org/declaration/lang--en/index.htm>



CRITERION 5.1

→ The Managing Entity guarantees free choice of employment and ensures that there is no forced or compulsory labour, which includes bonded or trafficked labour.

Intent

ILO Convention No. 29 defines forced labour as “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily”.

All forms of forced labour, whether direct or indirect, are prohibited. CmiA Managing Entities shall not engage in any form of servitude or forced, bonded, indentured, trafficked, or non-voluntary labour. Managing Entities act with special diligence when engaging and recruiting migrant workers.

Slavery, misuse of prison labour, forced recruitment, debt bondage, human trafficking for labour, and sexual exploitation are some examples of forced labour. It is considered forced labour if any part of the workers’ salary, benefits, property, or documents is retained in order to force them to remain in their employment or if workers are required or forced to remain in employment against their will using any physical or psychological means.

Additionally, forced or compulsory labour performed by persons under 18 years of age is considered to be one of the worst forms of child labour, as per ILO Convention 182. Forced labour is usually considered unlawful under national legislation.

INDICATORS

No.	Core	Field	Ginnery
5.1.1(a)	No forced, bonded, trafficked, or otherwise involuntary labour, including involuntary prison labour, is used or tolerated at the field level.	✓	
5.1.1(b)	No forced, bonded, trafficked, or otherwise involuntary labour, including involuntary prison labour, is used or tolerated at the ginnery level.		✓
5.1.2	If labour by prisoners is permitted by national or local labour or other laws and the Managing Entity wants to engage with prisoners or with those working under imprisonment, it must strictly follow ILO’s definition on acceptable forms of prison work (Convention 29).		✓
5.1.3	Employees and workers are not required to submit deposits or identity papers, nor are salaries, benefits, or property retained in order to force employees or workers to remain on the worksite. Furthermore, the Managing Entity does not impose debt on workers (e.g. through large pay advances or for food, equipment, or transportation fees) that is difficult or impossible to repay on low wages.		✓
5.1.4	The Managing Entity respects its workers’ rights to leave employment after giving reasonable notice.		✓



Guidance for Implementation

Workers' salaries, documents, benefits, property, or any rights acquired in the course or due to the status of work or stipulated by law shall not be withheld in order to force them to work or remain in the workplace. The use of extortion, debt, threats, sexual abuse, or harassment to force workers to work or to stay in the workplace is prohibited.

If labour by prisoners is permitted by national or local labour or other laws and the Managing Entity wants to engage with prisoners or with those working under imprisonment, it must strictly follow ILO's guidance¹ on acceptable forms of prison work (Convention 29):

The requirement of free consent also applies to prisoners. A company engaging prison labour should ensure that if a prisoner refuses the work offered there is no menace of any penalty, such as loss of privileges or an unfavourable assessment of behaviour which could jeopardize any reduction in his or her sentence.

A good indication of whether prisoners freely consent to work is whether the conditions of employment approximate those of a free labour relationship. Indicators include the following:

- Each worker receives and signs a standardized consent form from the enterprise indicating that they agree to work. The form indicates the wages and conditions of work.
- The conditions of work the enterprise offers are similar to work outside the prison, namely:
 - Wages are comparable to those of free workers with similar skills and experience in the relevant industry

or occupation, taking into account factors such as productivity levels and any costs the enterprise incurs for prison security supervision of the workers.

- Wages are paid directly to workers. Workers receive clear and detailed wage slips showing hours worked, wages earned and any deductions authorized by law for food and lodging.
- The daily working hours are in accordance with the law.
- Safety and health measures respect the law.
- Workers are included in the social security scheme for accident and health coverage.
- Workers obtain benefits such as learning new skills and the opportunity to work cooperatively in a controlled environment enabling them to develop team skills.
- Workers have the possibility of continuing work of the same type upon release.
- Workers may withdraw their consent at any time, subject only to reasonable notice requirements.

All of these factors should be taken as a whole when considering whether the consent to work has been freely given. Formal, preferably written, consent should be attained by each individual prisoner before engaging him or her to work.

Practical application of these provisions may be difficult and require verification to ensure that abuse does not occur.

¹ https://www.ilo.org/empent/areas/business-helpdesk/faqs/WCMS_DOC_ENT_HLP_FL_FAQ_EN/lang--en/index.htm#Q3



CRITERION 5.2

→ The Managing Entity implements a policy of non-discrimination and supports disadvantaged groups.

Intent

CmiA Managing Entities are committed to non-discrimination and equal opportunity and are rooted in the principle that all decisions—whether regarding employment or farmers' contracts—are based on the ability of the individual to do the job or fulfil the contract without regard to personal characteristics that are unrelated to the inherent requirements of the work. Managing Entities do not discriminate, exclude, or have a certain preference for persons on the basis of gender, age, religion, race, colour, birth, social background, disability, ethnic or national origin, nationality, membership in unions or any other legitimated organisations, political affiliation or opinions, sexual orientation, family responsibilities, marital status, disease, or any other condition that could give rise to discrimination.

By actively reaching out to communities in which they operate, Managing Entities can go beyond their legal obligations with respect to non-discrimination and create opportunities for previously alienated groups to participate in out-grower schemes or the labour market.

INDICATORS

No.	Core	Field	Ginnery
5.2.1	The Managing Entity does not tolerate any form of discrimination. This includes benefits or discrimination in terms of contracting, promotion, remuneration, training, or other activities on any basis, including gender, age, religion, race, colour, caste, ethnicity, nationality, social background, disability, political opinion, sexual orientation, family responsibilities, pregnancy, childbirth, marital status, disease, and membership in farmers' unions or farmers' representative bodies.	✓	
5.2.2(a)	The Managing Entity has a written code of conduct or policy on non-discrimination that is communicated to CmiA-contracted farmers.	✓	
5.2.2(b)	The Managing Entity has a written code of conduct or policy on non-discrimination that is communicated to employees and workers.		✓
5.2.3(a)	The Managing Entity has identified disadvantaged/minority groups at the field level and has a time-bound plan to improve the position of disadvantaged/minority groups.	✓	
5.2.3(b)	The Managing Entity has identified disadvantaged/minority groups at the ginnery level and has a time-bound plan to improve the position of disadvantaged/minority groups.		✓
5.2.4	The Managing Entity does not conduct tests for pregnancy, HIV, or genetic problems during the recruitment of employees and workers.		✓



Guidance for Implementation

The Managing Entity bases farmers' contracts and employment relationships on the principle of equal opportunity and fair treatment and does not discriminate with respect to aspects of the contractual or employment relationship, including recruitment and hiring,

compensation (including wages and benefits), working conditions, terms of employment or contracts, access to training, promotion, termination of employment, retirement, or disciplinary measures.



CRITERION 5.3

→ The Managing Entity ensures a respectful working environment without harassment or corporal punishment and with transparent disciplinary measures.

Intent

It is a human right for every person to be treated with respect and dignity. CmiA reflects this by expecting Managing Entities to provide a respectful working environment, i.e. a safe place of employment where employees are valued, recognised, treated fairly, have clear expectations, and work harmoniously.

As part of their non-discrimination policy, Managing Entities must establish and communicate that there is zero tolerance for harassment of any kind. Fairness and transparency in disciplinary procedures are equally important.

Fair disciplinary procedures not only help to eliminate inhumane treatment of workers but are a basic tool for creating a productive and harmonious workplace. Corporal punishment of workers is excluded through adherence to the Universal Declaration of Human Rights. Disciplinary practices should be documented in HR policies and procedures.

INDICATORS

No.	Core	Field	Ginnery
5.3.1(a)	The Managing Entity does not directly or indirectly engage in, support, or tolerate the use of corporal punishment, sexual harassment, mental or physical coercion, or any other kind of verbal or physical abuse or harassment at the field level.	✓	
5.3.1(b)	The Managing Entity does not directly or indirectly engage in, support, or tolerate the use of corporal punishment, sexual harassment, mental or physical coercion, or any other kind of verbal or physical abuse or harassment at the ginnery level.		✓
5.3.2(a)	The Managing Entity establishes and implements a policy for its staff that clearly prohibits sexual harassment at the field level, including behaviour, gestures, language, and physical contact that are sexually intimidating, abusive, or exploitative. CmiA-contracted farmers, employees, and workers are aware of this policy and its contents, and it applies to management and workers alike.	✓	



No.	Core	Field	Ginnery
5.3.2(b)	The Managing Entity establishes and implements a policy for its staff that clearly prohibits sexual harassment at the ginnery level, including behaviour, gestures, language, and physical contact that are sexually intimidating, abusive, or exploitative. Employees and workers are aware of this policy and its contents, and it applies to management and workers alike.		✓
5.3.3	The Managing Entity has established and implemented a transparent policy for disciplinary measures and ensures that employees and workers are aware of this policy. The policy is in line with the principle of non-discrimination (cf. indicator 5.2.2(b)) and includes procedures for implementation.		✓
No.	Improvement	Field	Ginnery
5.3.4	All disciplinary measures are properly justified and recorded so that the employee or worker is informed of the reasons for the decision and has the opportunity to file a grievance (cf. criterion 1.3).		✓
5.3.5	For at least two years or for the period required by national law (whichever is longer), the Managing Entity keeps a record of all terminated contracts, including the Managing Entity's reason for termination.		✓

Guidance for Implementation

Harassment can be defined as unwelcome verbal or physical behaviour that is based on race, colour, religion, sex (including pregnancy), gender, gender identity, nationality, ethnicity, age, physical or mental disability, or genetics. Examples of harassment in the workplace include derogatory jokes, racial slurs, personal insults, and expressions of disgust or intolerance towards a particular social group. Abuse may range from mocking a worker's accent to psychologically intimidating employees by making threats or displaying discriminatory symbols.

The Managing Entity needs to ensure that farmers and workers are informed about its zero-tolerance approach to harassment and that they are aware of the possibility of filing grievances in case of infringements.

All disciplinary procedures must be in line with national legislation and based on the principle of proportionality. They are documented and are explained orally to workers in clear and understandable terms. Salary deductions are not used as a disciplinary measure.



CRITERION 5.4

→ The Managing Entity engages in partnerships and collaborations promoting decent working conditions.

Intent

Since the implementation of decent working conditions covers a wide range of topics, it makes sense for a Managing Entity to not only benefit from the knowledge and experience of others but also share its own best practices, seeking opportunities for cooperation and support through partnerships and collaboration.

INDICATORS

No.	Improvement	Field	Ginnery
5.4.1	Alliances or partnerships are established with any relevant organisations promoting decent working conditions.	✓	
5.4.2	The Managing Entity is engaged in outreach activities promoting decent working conditions for specific target groups (e.g. women, children, casual workers, local authorities, or schoolteachers).	✓	

Guidance for Implementation

To adopt and keep up with best practices for decent working conditions, a Managing Entity can join organisations, participate in training and working

groups, or engage in collaborative projects or initiatives. This can be realised at local, national, pan-African, or international levels.



CRITERION 5.5

→ The Managing Entity guarantees all employees and workers the right to establish and join workers' organisations and to bargain collectively.

Intent

The right of workers to freedom of association is, together with the right to collective bargaining, recognised through international human rights conventions. Article 23 of the Universal Declaration of Human Rights identifies the ability to organise trade unions as a fundamental human right, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work considers these rights to be an essential right of workers to further and defend the interests of workers and employees.

Collective bargaining is a constructive forum for addressing working conditions and terms of employment as well as relations between employers and workers or between their respective organisations. Sound collective bargaining benefits both management and workers. The process of collective bargaining allows the interests of both workers and employers to be voiced, common interests to be identified, different interests to be balanced against one another, and trade-offs to be negotiated.

Should a country not have ratified ILO Conventions 87 or 98, or should it not have established national laws to prohibit impairing the organisation of workers, Managing Entities need to facilitate parallel means for achieving the right to freedom of association.

Managing Entities respect the right of workers to organise themselves in a free and democratic way. The Managing Entity shall respect the right of workers to form unions as well as the workers' right to collective bargaining. There is no discrimination against workers because of trade union membership.

INDICATORS

No.	Core	Field	Ginnery
5.5.1	<p>Employees and workers can freely establish and join workers' organisations, both internal (such as workers' representation) and external (such as trade unions) and take part in collective bargaining on working conditions.</p> <p>The Managing Entity:</p> <ul style="list-style-type: none"> • respects the right of all employees and workers to form or join workers' organisations; • respects the rights of workers' organisations to draw up their own constitutions and rules, elect representatives, organise activities, and formulate programmes in full freedom; • respects the rights of workers' organisation to bargain collectively in practice; • accepts that it has the duty to bargain in good faith with workers' organisations; and • provides workers' organisations with the information needed for meaningful negotiation in a timely manner. 		✓



No.	Core	Field	Ginnery
5.5.2	<p>Employees and workers are not subject to any negative consequences if they establish or join a workers' organisation. This includes that:</p> <ul style="list-style-type: none"> members or representatives of workers' organisations are not punished, threatened, intimidated, harassed, or bribed; employees and workers are not discriminated against for their past or present membership or activities in workers' organisations; the hiring of employees and workers is not contingent on them quitting or not joining a workers' organisation; and the Managing Entity does not make any statements or take any actions which interfere with (or seek to influence) the choice of any employee or worker to form or join a workers' organisation. 		✓
5.5.3	<p>Employees and workers are informed about:</p> <ul style="list-style-type: none"> the right to establish and join a workers' organisation; the right to bargain collectively on working terms and conditions; and the guarantee that they will not be subject to any retaliation, discrimination, or other negative consequence if they exercise any of these rights. <p>These rights are communicated clearly and effectively by individual letter or by a general announcement.</p>		✓
5.5.4	<p>The Managing Entity provides trade-union representatives representing employees or workers with access to the workplace in order to communicate about unionisation and/or to carry out their representative function at an agreed-upon time and place. These meetings take place without interference or surveillance by the management.</p> <p>If employees and/or workers are not represented by a trade union authorised to collectively bargain with the company, the Managing Entity allows representatives of trade-union organisations that represent workers in the cotton sector or region to meet with employees and workers on company premises at agreed-upon times. Trade union representatives must be able to carry out their duties and to inform the employees and workers about trade unions. Such meetings must take place without interference or surveillance by management.</p>		✓
5.5.5	<p>The Managing Entity ensures that elected worker representatives and representatives of workers' organisations:</p> <ul style="list-style-type: none"> are able to carry out their functions in the workplace; have access to all workers in the workplace at agreed-upon times during working hours, on average every three months, without interference by or the presence of management representatives; can meet among themselves during regular working hours, at least once a month for an hour; and regularly meet representatives of senior management during working hours. <p>Meeting schedules are agreed upon between representatives and management on a regular basis and must be signed and documented.</p>		✓



No.	Improvement	Field	Ginnery
5.5.6	In countries where a collective bargaining agreement (CBA) is in place for the sector, the Managing Entity signs and adheres to this agreement. Collective bargaining at the company level may take place even if a sector-wide collective agreement exists; however, the company-level agreements may not provide lesser terms and conditions than the sector-wide agreements.		✓
5.5.7	A democratically elected and independent workers' organisation representative or elected workers' representative exists.		✓
5.5.8	The senior management frequently meets with the workers' organisation representative or elected workers' representative.		✓

Guidance for Implementation

Direct or indirect interference or retaliation against any form of workers' representation is prohibited. Managing Entities shall not subject workers to any workplace dismissals, discrimination, or prejudice of any kind because of workers' participation in forming a trade union or their membership therein.

Workers' representatives shall be able to act and make decisions on their behalf, fully independently of management. The establishment, functioning, and administration of workers' representation shall not be dominated by employers through financial or other means.

Free access to the workers' workplace by trade unions and their representatives shall be granted by management. Lawful activities of workers' organisations shall not be restricted or prevented. Upon request, facilities convenient to workers shall be provided for the activities of workers' organisations.

The right of workers to freely organise, form workers' organisations, and bargain collectively shall be communicated to current staff and each time a new staff member is hired.



CRITERION 5.6

→ The Managing Entity supports the development of effective producers' organisations and/or strengthens existing ones.

Intent

The establishment and development of farmers' organisations depends on a country's institutional sector organisation. Where these exist, the Managing Entity integrates with and builds on the present infrastructure for farmers' organisations. Where they do not exist or are not effective, Managing Entities can help play an important role in fostering the organisation of cotton farmers through the creation of learning or marketing groups.¹ Farmers can establish farmers' unions and utilise farmers' unions to participate in price-setting negotiations.

INDICATORS

No.	Core	Field	Ginnery
5.6.1	<p>CmiA-contracted cotton farmers can freely establish and join farmers' unions and participate in price-setting negotiations through their representatives. The Managing Entity:</p> <ul style="list-style-type: none"> • respects the right of farmers to form or join farmers' unions; • respects the right of farmers' unions to participate in price-setting negotiations; and • does not discriminate against farmers for founding or joining farmer' unions and/or for participating in price-setting negotiations through their representatives. 	✓	
No.	Improvement	Field	Ginnery
5.6.2	The Managing Entity supports the development of producer groups and/or strengthens existing ones.	✓	
5.6.3	The Managing Entity keeps records of the number of CmiA-contracted farmer groups and of the number of farmers organised in these groups.	✓	

Guidance for Implementation

Cotton farmers' organisations should provide tangible benefits to their members, be owned and controlled by their members, and be mostly composed of small-scale farmers.

Farmers' unions or—if no active unions exist—government

institutions such as the Ministry of Agriculture usually participate in price-setting negotiations on behalf of farmers. Managing Entities shall not discriminate against farmers for founding farmers' unions or utilising farmers' unions for collective bargaining (cf. criterion 5.5).

¹ Depending on the context and the country, these groups are sometimes called "farmer field schools", "farmer business groups", "cotton clubs", etc.



CRITERION 5.7

→ The Managing Entity has clear and equitable contracts with CmiA-contracted farmers.

Intent

Through written contracts that are established between CmiA Managing Entities and farmers, conditions for the cultivation of cotton and the role of each party are put on a transparent and fair basis. Contracts are explained by the Managing Entity's staff so that farmers have a good understanding of their own engagement and the Managing Entity's commitment.

Contracts include conditions for input supply and output sales, including any applicable pre-financing terms for supplied inputs.

CmiA encourages the organisation of farmers into groups or associations. Where such groups exist and take over functions on behalf of the individual farmers—e.g. the storage of inputs, the guarantee of input credits, and the marketing of cotton—Managing Entities can also establish written contracts with the groups (cf. criterion 5.6).

INDICATORS

No.	Core	Field	Ginnery
5.7.1	All CmiA farmers or CmiA-contracted farmer groups (in the case of group contracts) receive written contracts in a language or languages understandable to them. At minimum, contracts must clearly indicate: <ul style="list-style-type: none"> • pre-finance terms and conditions; • grading, where applicable, and base price; • delivery and payment terms and conditions; and • an arbitration system to resolve conflicts regardless of jurisdiction. 	✓	
5.7.2	The Managing Entity ensures that CmiA-contracted farmers have a good understanding of the contract and the associated rights and obligations.	✓	

Guidance for Implementation

For verifications at the field level, the focus of observation should be on contracts and farmer recruitment procedures as well as on buying procedures during the marketing season.

Typical Content of Contracts

Typical duties of Managing Entities: provide inputs to farmers on time; provide training and extension services; buy cotton from farmers; provide transport for the cotton from the point of sale to the ginnery.

Typical duties of farmers: attend training; sell their cotton to the Managing Entity; pay back their input credits with the harvested cotton.

Usually, the recovery of input credits is connected to the farmer selling his/her harvested cotton exclusively to the Managing Entity. In some cases, sales exclusivity can be limited to the amount of the cotton that needs to be sold in order to pay back the credit instead of encompassing

the totality of the farmer's harvest. In other cases, especially where no pre-financing is offered or requested, farmers may be free to sell to any buyer.

From the verification point of view, it is important to make sure, firstly, that the Managing Entity and the farmers respect and follow the rules of the country and, secondly, that farmers are enabled to make informed choices.

Group Contracts

If farmers are organised in groups/cooperatives, the Managing Entity can establish written contracts with those groups. However, the existence of individual farmer contracts should be proven at the group/cooperative level. Group contracts should name and identify the individual farmers, and individual farmers must have access to and know the terms of the group contracts.



CRITERION 5.8

→ The Managing Entity has a transparent grading and payment system for seed cotton in place and guarantees timely payments to CmiA-contracted farmers.

Intent

As the buying prices for seed cotton relate closely to the world market price, Managing Entities and farmers are both limited in their ability to estimate the buying prices for seed cotton before the start of the season. Instead, production decisions need to be made on the basis of experience and the previous year's price. Managing Entities can, however, contribute to establishing and maintaining fair and transparent price-negotiating mechanisms in the country by ensuring fair participation for farmers. Through their representatives, farmers' associations, or farmers' unions, farmers can participate in the price-setting mechanisms.

Furthermore, by paying higher prices for better quality cotton, Managing Entities give incentives to farmers to adopt good agricultural practices and to produce cotton of better quality. This also implies the need for a transparent and fair grading system for cotton that is accepted by all parties.

With cotton being one of the most important cash crops for many small-scale farmers, it is essential that income from seed cotton sales be made available to farmers in a timely manner, right after the harvest.

Once cotton has been harvested, the Managing Entity should ensure short pick-up times from the marketplaces. This helps reduce the risk of cotton quality suffering due to insufficient storage facilities or rainfall. Additionally, the Managing Entity should ensure quick payment to the farmers and allow the farmers to choose a convenient form of payment.

INDICATORS

No.	Core	Field	Ginnery
5.8.1	The Managing Entity has a transparent system of seed-cotton grading in place at the farmer level and pays different prices for different levels of seed-cotton quality. In countries where seed-cotton grading is not practised at the farmer level, the Managing Entity is exempt from this requirement but obligated to pay the best-quality price to CmiA-contracted farmers.	✓	
5.8.2	The Managing Entity provides CmiA-contracted farmers or farmer groups with a summary of deliveries and payments made, indicating the seed-cotton buying price as well as any deductions made for input provision.	✓	
5.8.3	CmiA-contracted farmers are paid for their cotton in a timely manner, no later than 30 days after delivery to the point of sale. Payments are made in a form convenient for farmers.	✓	



Guidance for Implementation

Information about the buying price should be made available as early as possible and can be shared with farmers by various means, e.g. via extension staff or radio messages.

Seed cotton can be graded at the farmgate, at the ginnery, or both. However, it is essential to ensure that farmers are paid a higher price for better quality cotton.

For CmiA, it is crucial to make sure that farmers receive

the income for their harvested seed cotton as quickly as possible. The relevant time span is the one between delivery to the point of sale—not collection by the Managing Entity or demand for payment by the farmer or the farmers' group—and the receipt of the payment by the farmer or the farmers' group.

Payment forms that are convenient for farmers can include cash, mobile money transfer, or distribution through the farmers' group.



CRITERION 5.9

→ The Managing Entity ensures that all employees and workers enjoy fair conditions of employment with regard to wages and contracts.

Intent

The ILO Equal Remuneration Convention (C 100) applies the principle of equal remuneration for men and women for work of equal value, meaning that rates of remuneration must be determined without reference to gender. However, unequal pay might not only be based on gender but can affect other groups of workers too, e.g. workers of different nationalities or ethnicities. CmiA therefore requires Managing Entities to ensure equal pay for equal work for all groups of people.

Any work in the ginneries is performed on the basis of a recognised and documented employment relationship established in compliance with national legislation, custom, or practice and with international labour standards, whichever provides greater protection.

Wages are an essential element for the workers' well-being. CmiA aims at granting ginnery workers living wages, i.e. wages that are sufficient to provide them with a decent standard of living for themselves and their families. To achieve this aim, compliance with the ILO fundamental conventions in the domain of Freedom of Association and Collective Bargaining is a precondition, as the best way of determining the actual amount of wages paid is through a continuing process of sound social dialogue between local social partners, e.g. between employers and workers or their representatives. In this way, collective bargaining can, per se, be considered a way of working towards a living wage (cf. criterion 5.5).

Wages are to be paid in a timely manner, regularly, and fully in legal tender. Partial payment in the form of allowance in kind is accepted in line with ILO specifications.



INDICATORS

No.	Core	Field	Ginnery
5.9.1	<p>The Managing Entity ensures that CmiA-contracted farmers with a cotton area above 20 hectares who hire workers are aware of:</p> <ul style="list-style-type: none"> the legally applicable minimum wages (e.g. the national or regional statutory minimum wage applicable to agriculture, a collectively agreed-upon wage, or the industry minimum); and the rule of paying equal wages to workers who perform the same job without discrimination, whether based on gender or any other factor. 	✓	
5.9.2	<p>The Managing Entity must set wages for employees and workers according to any applicable legal or sectoral CBA regulations or to regional average wages or to official minimum wages for similar occupations, whichever is the highest, with the intention of continually increasing the wages.</p> <p>This applies equally to seasonal workers, casual workers, and/or workers who are paid per unit or result. Wages must be specified for all employee functions and employment terms, such as casual workers or piece-work.</p>		✓
5.9.3	<p>The Managing Entity does not make any deductions from salaries unless they are in accordance with national law or collective bargaining agreements and the employee has given written consent. If deductions are made from salaries for services provided by the company, the amount must be in line with the actual cost incurred. The Managing Entity shall not include essential services for employees or workers to perform their work as benefits (e.g. protective equipment, tools, special medical exams) nor deduct their cost from the wages paid to the worker.</p> <p>Salary deductions must not be used for disciplinary purposes.</p>		✓
5.9.4	<p>The Managing Entity offers equal pay for equal work to all employees and workers—whether permanent, temporary, or migrant—without discrimination based on gender or any other factor. This includes equivalent benefits and employment conditions for equal work.</p>		✓
5.9.5	<p>Employees and workers are paid regularly (at least monthly) and on time through an appropriate method of payment. Payments are documented with a clear and understandable payslip containing all necessary information (including the time period, the gross and net wage and benefits, wage calculations for piece rates, and the amount of and reason for any deductions). Payments are made in national currency. Employees and workers must sign for payments received in cash. Payroll records are kept.</p>		✓



No.	Core	Field	Ginnery
5.9.6	<p>All employees and workers, including permanent, seasonal, casual, and migrant workers, receive legally binding written contracts of employment signed by both the worker and the employer prior to work commencing. A copy is handed over to the employee/worker. The contracts include at least the following:</p> <ul style="list-style-type: none"> • Job description • Working hours and rest periods • Wage • Form and frequency of payment • Overtime regulations • Social benefits • Entitlements and deductions • Annual paid leave, sick leave, and protection of the worker from loss of pay in the case of illness, disability, accident, or loss of life • A notice period for termination that is the same as the notice period for the employer <p>In countries where written contracts are not required by law for casual workers, the Managing Entity ensures that workers understand and agree with the terms of the verbal contract.</p>		✓
5.9.7	Employees and workers receive maternity rights and benefits in accordance with national law and practice. The adherence to regulations needs to be documented.		✓
5.9.8	Employees and workers can return to their job after maternity leave on the same terms and conditions and without discrimination, loss of seniority, or deduction of wages.		✓
5.9.9	The Managing Entity ensures that pregnant and nursing women do not perform work that may compromise the health of the mother or child. This includes working during night hours.		✓
No.	Improvement	Field	Ginnery
5.9.10	The Managing Entity has a policy on the treatment of temporary, seasonal, casual, and (sub-)contracted workers to ensure that these workers receive wages, benefits, and employment conditions that are equivalent to those of permanent workers in relation to their period of employment.		✓
5.9.11	All employees and workers are aware of their rights and duties, responsibilities, salaries, and work schedules.		✓
5.9.12	Breastfeeding women have two or more additional daily breaks during paid working time to nurture the child for at least six months.		✓
5.9.13	The Managing Entity assesses total remuneration (wages plus in-kind benefits) against the living-wage benchmark where available. If the remuneration is below the living-wage benchmark, actions are taken to increase it towards the living wage within a reasonable period of time and in consultation with workers' organisation(s) or workers' representatives.		✓



Guidance for Implementation

Wages

The level of wages should reflect the years of employment, skills, and education of workers and be consistent with regular working hours.

Regarding social benefits, global payments into social funds can be acceptable for seasonal and casual workers, depending on national legislation. A good source on minimum wages and employment legislation in CmiA partner countries can be found on the following website: <http://www.mywage.com/main>

Working Time

ILO Convention 001 says: Workers' regular working time does not exceed 8 hours per day and 48 hours per week. Overtime is allowable under exceptional circumstances, e.g. in production peaks, if it is voluntary and not on a regular basis, and it must not exceed 12 hours per week.



CRITERION 5.10

→ The Managing Entity protects the rights and health of employees and workers through appropriate working hours.

Intent

Working excessive hours poses a danger to workers' health and to their families. ILO standards on working time provide the framework for regulated hours of work, daily and weekly rest periods, and annual holidays. These instruments ensure high productivity while safeguarding workers' physical and mental health.

Managing Entities interpret applicable national laws, industry benchmark standards, or collective bargaining agreements in accordance with the international framework established by the ILO.

INDICATORS

No.	Core	Field	Ginnery
5.10.1	<p>The Managing Entity complies with applicable national and local legislation and industry standards and respects collective bargaining agreements regarding working hours and overtime regulations.</p> <p>At minimum, the Managing Entity complies with the following:</p> <ul style="list-style-type: none"> Regular working hours do not exceed eight hours per day and 48 hours per week Employees and workers have at least one day off after six days of work Employees and workers are not required to work unpaid overtime <p>This applies to all employees and workers equally, including seasonal workers, casual workers, and workers who are paid per unit or result.</p>		✓



No.	Core	Field	Ginnery
5.10.2	<p>The Managing Entity respects the following rules regarding overtime work:</p> <ul style="list-style-type: none"> • It is voluntary • It does not exceed twelve hours per week • It does not extend over a period of more than three consecutive months • It is paid according to national law or collective bargaining agreement <p>This applies to all employees and workers equally, including seasonal workers, casual workers, and workers who are paid per unit or result.</p>		✓
5.10.3	Recording of working hours—both regular and overtime—is done in a transparent manner.		✓
5.10.4	The Managing Entity grants and respects meal and work breaks in accordance with national legislation.		✓

Guidance for Implementation

Managing Entities do not require workers to work in excess of eight hours per day and 48 hours per week on a regular basis. The use of overtime is meant to be exceptional and voluntary and does not extend over a period of more than three consecutive months.

In addition, overtime does not exceed twelve hours per week or three months per year. In any case, workers receive overtime pay at a premium rate. If national legislation sets maximum weekly working time at less than 48 hours per week, the twelve hours are added to the national statutory working hours.

Exceptional circumstances can include peak production periods or necessary adjustments to production cycles caused by third parties, for example by rationing electricity supplies, and must be agreed by trade unions / worker representatives.



CRITERION 5.11

→ The Managing Entity ensures good practices regarding social security, leave of absence, and sick leave.

Intent

This criterion intends to ensure good practices regarding social security, including leave of absence, sick leave, work-related injury compensation, and survivor benefits. Managing Entities observe applicable national legislation and collective bargaining agreements with regard to these issues.

INDICATORS

No.	Core	Field	Ginnery
5.11.1	The Managing Entity observes national legislation regarding: <ul style="list-style-type: none"> • social insurance contributions; • regular paid leave; and • temporary (paid) sick leave. 		✓
5.11.2	The Managing Entity has a regulation granting paid leave in the event of a work-related injury, with the leave duration as prescribed by medical personnel. The regulation must ensure that employees and workers are protected from being dismissed during temporary leave. It must not deduct this leave from their annual leave.		✓
5.11.3	The Managing Entity has a regulation on disability compensation that ensures that employees and workers who sustain a long-term disability due to a work-related injury are fairly compensated. This applies to all employees and workers equally, including seasonal workers, casual workers, and workers who are paid per unit or result.		✓
5.11.4	The Managing Entity has a regulation on survivor benefits which ensures that the dependent family members of employees and workers who are killed in a work-related accident are fairly compensated. This applies to all employees and workers equally, including seasonal workers, casual workers, and workers who are paid per unit or result.		✓
No.	Improvement	Field	Ginnery
5.11.5	The Managing Entity has a regulation granting at least five days of regular (paid) sick leave per year. The regulation must ensure that employees and workers are protected from being dismissed during temporary sick leave. It must not deduct this leave from their annual leave.		✓



Guidance for Implementation

Managing Entities provide legal social security, including contributions to a provident fund or pension scheme for all workers, whether permanent, seasonal, or casual. In cases where equivalent benefits, such as social security, cannot be made available to a particular set of workers, e.g. migrant or casual workers, these workers shall receive the equivalent or an alternative through other means.

National laws define the mandatory social benefits granted to workers. Usually, these benefits cover old age pensions, survivor benefits, family benefits, parental leave, medical care, unemployment, sick leave, disability, work-related injury compensation, and vacation.



CRITERION 5.12

→ The Managing Entity provides a safe and healthy workplace.

Intent

Managing Entities respect the right of workers to healthy working conditions and must comply with national occupational health and safety regulations or, if domestic legislation is weak or poorly enforced, with international standards.

Staff need to be provided with the information and training they need to perform their work safely and without risk to their health. This way, staff can gain their own understanding of the extent of the hazards and associated risks and will more easily adopt the measures necessary to manage and reduce these risks.

It is the Managing Entity's responsibility to prevent accidents and injuries by minimising, as far as reasonably practicable, risks inherent in the working environment through appropriate measures and adequate control. The buildings, workplaces, machinery, equipment, and processes under the Managing Entity's control shall be safe and pose no risk to staff health. Where necessary, the Managing Entity shall provide adequate clothing and protective equipment. Workers and workers' representatives shall be given appropriate training in occupational safety and health.

INDICATORS

No.	Core	Field	Ginnery
5.12.1	The Managing Entity has a health and safety policy in place and communicates it to employees and workers.		✓
5.12.2	The Managing Entity appoints a health and safety focal person (H&S focal person) to be in charge of occupational health and safety matters and to report to senior management. The H&S focal person must be qualified, adequately trained for the job, and equipped with sufficient time and resources to carry out duties including: implementing, suggesting, planning, and monitoring measures to improve on-site health and safety in addition to informing and training employees and workers in H&S. The duties of the H&S focal person must be included in the corresponding employment contract / job description.		✓



No.	Core	Field	Ginnery
5.12.3	<p>The Managing Entity ensures that regular assessments of the main health and safety risks as well as all potential work hazards are conducted, and measures are implemented to eliminate or mitigate these risks. All risks and hazards as well as planned and implemented activities are well documented in an H&S plan.</p> <p>The H&S plan:</p> <ul style="list-style-type: none"> • is maintained and reviewed when necessary, at least every two years; • includes specific measures for young employees and workers, pregnant and nursing women, persons with disabilities, and elderly workers, as applicable; and • ensures equal treatment for employees and workers facing similar risks. 		✓
5.12.4	<p>The Managing Entity has procedures in place to ensure that worker representatives are involved in health and safety matters, e.g. through regular meetings with the H&S focal person, by taking part in inspections, or by participating in a health and safety committee. Employees and workers have the possibility to report any health and safety risks or work hazards.</p>		✓
5.12.5	<p>The Managing Entity ensures that all employees and workers are trained in the basic requirements of occupational health and safety and relevant health protection immediately before starting any new job. Employees and workers that are engaged in potentially hazardous work are trained according to the tasks they carry out at least once a year. The training includes the proper use of personal protective equipment (PPE). All employees and workers are made aware of their right to remove themselves from unsafe situations without seeking permission or being penalised for doing so. Regular refresher training takes place at least once a year.</p> <p>The Managing Entity keeps records of the training activities, indicating training topics, time, duration, and the names of attendees and trainers.</p>		✓
5.12.6	<p>The H&S point person must compile reports on all accidents and subsequent first-aid measures occurring at the workplace, in company-controlled residences and properties, or during work-related travel and transport. This includes recording of the number of fatalities and lost-time injuries (any injury sustained by an employee while on the job that prevents the employee from performing his or her job for at least one day or shift). Reports are provided for risk assessments, and the H&S point person proposes actions to reduce work-related accidents and illnesses where possible.</p>		✓
No.	Improvement	Field	Ginnery
5.12.7	<p>The Managing Entity correctly calculates the frequency rate of lost-time injuries.</p>		✓

Guidance for Implementation

Dust and noise are potential health risks in ginneries. Verifiers therefore need to check whether a dust collection system exists in the ginnery and whether dust masks are, where suitable, part of personal protective equipment (PPE). With regard to noise, verifiers check whether noise reduction measures are in place, earplugs are provided to workers where suitable, and their proper use is monitored.

A lost-time injury is something that results in a fatality, permanent disability, or time lost from work, which could be as little as one day or shift. The lost-time injury frequency rate (LTIFR) refers to the number of lost-time injuries within a given accounting period, relative to the total number of hours worked in that period. It is a proxy measurement for safety performance.



CRITERION 5.13

→ The Managing Entity ensures that measures are in place to deal with accidents and emergencies, including first aid.

Intent

Even when all risks are considered and appropriate management programmes have been put in place, accidents and emergencies can happen. Managing Entities need to be prepared to respond effectively in order to prevent and mitigate any harm to workers, communities, or the environment. The proper implementation of an emergency response plan will not only protect the health, safety, and lives of people at or near work sites but also minimise business losses.

The Managing Entity respects national regulations concerning medical provisions. It provides adequate emergency first aid facilities, equipment, and appropriately trained first aid staff to meet all reasonably foreseeable situations requiring emergency first aid.

INDICATORS

No.	Core	Field	Ginnery
5.13.1	<p>The Managing Entity has a clearly written accident and emergency procedure in place. The procedure is visually displayed at all central locations and includes at least:</p> <ul style="list-style-type: none"> Names of contact persons Actions to take in emergency situations Locations of means of communication An up-to-date list of emergency telephone numbers (e.g. for the fire department, the ambulance, or the police) <p>The procedure uses symbols, pictograms, and the predominant language(s) of the employees and workers.</p>		✓
5.13.2	<p>Each working area has properly marked fire exits, escape routes, and firefighting equipment as well as appropriate fire alarms. Fire exits and escape routes are kept clear of obstacles, unblocked, and easily openable at all times when employees or workers are present, allowing for a swift and safe exit in case of emergency.</p>		✓
5.13.3	<p>All employees and workers are trained in evacuation procedures, and regular fire-safety drills are conducted at least twice during the ginning season or in accordance with national legislation, whichever number is higher. Training efforts and fire drills are documented.</p>		✓
5.13.4	<p>The Managing Entity provides adequate first-aid facilities, equipment, and appropriately trained first-aid staff to meet all reasonably foreseeable emergency situations requiring first aid. This includes at least:</p> <ul style="list-style-type: none"> The availability of a person trained in first aid on every shift at an adequate location First-aid boxes placed at central locations accessible to all employees and workers Complete and up-to-date first aid boxes; the H&S point person must check and restore the first-aid boxes at least every two months to ensure that all boxes are complete Free transport to medical facilities <p>Employees and workers receive first-aid services and emergency healthcare free of charge.</p>		✓



No.	Core	Field	Ginnery
5.13.5	A reasonable number of employees and workers receive regular training in first aid. The Managing Entity keeps records of the training, indicating time, duration, and the names of attendees and trainers.		✓
No.	Improvement	Field	Ginnery
5.13.6	The Managing Entity provides appropriate medical aftercare in the event of work-related injury by providing free, permanent medical support on site or by guaranteeing free transportation to the nearest hospital for follow-up medical treatments. This applies to all employees and workers equally, including seasonal workers, casual workers, and workers who are paid per unit or result.		✓

Guidance for Implementation

Emergencies

An emergency preparedness and response plan should include:

- Identification of potential emergencies based on hazard assessments
- Procedures for responding to the identified emergency situations
- Procedures for shutting down equipment
- Procedures for rescue and evacuation, including a designated meeting place outside the facility
- Locations of alarms and a maintenance schedule
- Lists and locations of equipment and facilities for employees responsible for responding to the emergency (e.g. fire-fighting equipment, PPE for the emergency response teams, and first aid kits and stations)
- Protocols for the use of the emergency equipment and facilities
- A schedule for the periodic inspection, testing, and maintenance of emergency equipment
- Clear identification of evacuation routes and meeting points
- A schedule of training (drills), including with local emergency response services (e.g. fire fighters)
- Procedures for emergency drills
- Emergency contacts and communication protocols, including with affected communities when necessary, and procedures for interaction with government authorities
- Procedures for the periodic review and updating of emergency response plans

In addition to the general rules listed above, it is important to ensure that cotton is stored safely and that there is a water hydrant system on-site due to the spontaneous combustion risk of cotton.

First Aid

The Managing Entity ensures that an appropriate number of staff is trained in first aid, that first aid kits are available and fully equipped, and that there is access to medical treatment for all staff. Workers who use machines or vehicles or who conduct any other risky activity must receive frequent and regular training in first-aid protocol.

The Managing Entity provides appropriate care in case of work-related illness or injury by providing free, permanent on-site medical support that is adequately equipped to deal with accidents. Alternatively, the Managing Entity guarantees free transportation to the nearest hospital as well as follow-up medical treatment.

Reports are compiled on all workplace accidents and on subsequent first aid measures. Accident records are analysed to gather lessons learnt and to adjust protocols accordingly.

Accident records should specify:

- When the accident took place
- Who was involved
- What actions were taken
- What the final result was (death, injury)
- How the accident was investigated
- What prevention and remediation actions were taken
- For how long the worker was incapacitated



CRITERION 5.14

→ The Managing Entity effectively manages workplace hazards.

Intent

To ensure safety, the Managing Entity must ensure that:

- Systems to detect, avoid, or respond to potential threats to the health and safety of workers are established
- Particular attention is paid to identify hazards that might be more harmful or likely to affect vulnerable groups of workers, such as young workers or pregnant or nursing women, or workers suffering from specific diseases
- Risk areas and potential hazards are clearly identified by warning signs in appropriate languages, including with pictograms, if possible
- Safety instructions and procedures, including accident prevention and response, are in place and communicated to staff
- All hazardous machinery and equipment are equipped with adequate safety devices
- Protective guards are placed over moving parts
- Safety equipment is provided to all workers, and they are instructed and monitored in its proper use

INDICATORS

No.	Core	Field	Ginnery
5.14.1	The following persons must not be engaged in any potentially hazardous work: <ul style="list-style-type: none"> • People younger than 18 years of age • Pregnant or nursing women • People with incapacitating mental conditions • People with a chronic, hepatic, or renal disease • People with a respiratory disease 		✓
5.14.2	All risk areas and potential hazards are clearly identified by permanent warning signs in appropriate language(s) and include pictograms if possible.		✓
5.14.3	The Managing Entity clearly displays all information, safety instructions, and hygiene recommendations regarding hazardous work in a visible position in the workplace, provided in language(s) understood by employees and workers and supplemented with pictograms.		✓
5.14.4	All working areas must be free of obvious defects and maintained in a safe, clean, and, where necessary, hygienic conditions at all times.		✓
5.14.5	All hazardous machinery and equipment are equipped with adequate safety devices, and any dangerous parts are guarded or encased.		✓
5.14.6	All electrical equipment, wiring, and outlets must be properly placed, grounded, and regularly inspected for overloading and leakage by a professional. Inspection protocols must be available on site and renewed annually.		✓
5.14.7	All workplaces must have adequate lighting, ventilation, and control systems in place for noise, dust, and vibration in accordance with legal requirements.		✓



No.	Core	Field	Ginnery
5.14.8	The Managing Entity provides personal protective equipment (PPE) of adequate quality to all employees and workers free of charge and ensures that employees and workers know how to use it. The Managing Entity ensures that: <ul style="list-style-type: none"> • PPE provides effective protection as intended; • PPE is adequate given the working environment (e.g. if work is performed in hot conditions) and the comfort of the employees and workers (e.g. PPE in the correct size for the respective employee or worker); • a replacement stock of proper PPE is available; • all PPE is in good condition; and • employees and workers are trained in the proper use of PPE (cf. indicator 5.12.5). 		✓
5.14.9	Visible signs are posted in the workplace displaying the specific PPE required for each workplace or working area.		✓
No.	Improvement	Field	Ginnery
5.14.10	The Managing Entity has a system in place to monitor the effective use of PPE by employees and workers. Records of monitoring are kept.		✓
5.14.11	Employees and workers engaged in handling any potentially hazardous chemicals or working in a hazardous environment (e.g. extensive dust or noise) receive a free examination by a medical doctor at least once a season. These examinations must be confidential to the respective employee or worker.		✓

Guidance for Implementation

- Protective clothing and equipment: Depending on the workplace and on the hazards each worker is exposed to, this can include helmets, dust masks, earplugs, gloves, safety shoes, overalls, etc.
- Safe machinery and material: protection of machinery with exposed electrical, cutting, or moving pieces; protection of ladders, etc. to reduce the risk of falling from heights; helmets as part of PPE where suitable

All information, safety instructions, re-entry intervals, and hygiene recommendations regarding hazardous work must be clearly displayed in the workplace, situated in a visible place, and formulated in the language(s) understood by workers, including with pictograms.

Instructions on hazardous work need to be in line with technical guidelines provided by machinery and production suppliers and must pass inspection by local authorities (e.g. firefighting brigades or labour inspectors).

Managing Entities provide personal protective equipment (PPE) of adequate quality to all workers, including casual workers. Depending on the workplace, adequate-quality protective equipment can include items such as gloves, safety shoes, earplugs or earmuffs, helmets, and respiratory protection. Equipment that is worn out or damaged has to be replaced free of charge. Workers are properly trained in the use of the equipment and are monitored accordingly.



CRITERION 5.15

→ The Managing Entity provides all employees and workers with clean drinking water, sanitation facilities, changing rooms, and areas for rest and food consumption.

Intent

CmiA wants Managing Entities to implement international best practices by providing access to safe water at all times as well as clean, healthy, and good sanitary conditions at the workplace, in eating areas, and in changing rooms at an appropriate level of standard for all employees and workers on all premises.

Managing Entities respect the characteristics and tests required for potable water as defined by national regulations. With regard to sanitation facilities, Managing Entities follow national regulations concerning the minimum number of toilets and washing facilities for the size of the ginnery. Gender-based needs have to be taken into consideration.

Managing Entities also follow national regulatory criteria related to adequate areas for food consumption and provide clean and appropriate areas, including during peak season or on any other occasion where the number of workers may increase.

INDICATORS

No.	Core	Field	Ginnery
5.15.1	All employees and workers have access to drinking water in sufficient quantity and close to the working area. The rest or food-consumption area has clearly labelled drinking-water facilities. The water quality is monitored, and monitoring results are documented.		✓
5.15.2	All employees and workers have access to clean toilets with hand-washing facilities and changing rooms. Lockable storage facilities are provided for staff. Toilets and changing rooms are separate for women and men, and the number of toilets and hand-washing facilities are in proportion to the number of employees and workers. All facilities are well maintained and cleaned regularly.		✓
5.15.3	All employees and workers have access to adequate rest areas, food-consumption areas, canteens, and/or food-storage facilities. Rest and eating areas are clean, well maintained, and, as much as possible, free of pests. There are hand-washing facilities close to the food-consumption areas.		✓
No.	Improvement	Field	Ginnery
5.15.4	Any meals provided by the Managing Entity are optional for employees and workers and should be comparable to an adequate, healthy, and nutritious diet in the local context.		✓
5.15.5	Employees and workers receive instructions for basic hygiene. Hygiene instructions are visibly displayed at central locations such as hand-washing and toilet facilities, rest and food-consumption areas, and production, processing, and maintenance areas. Instructions use symbols, pictograms, and the predominant language(s) of the employees and workers.		✓



Guidance for Implementation

Verifiers should check whether workers are aware of their right to potable water at all times. Managing Entities ensure that there are proper signs identifying water as non-potable in places where it is not mandatory that water be potable.

Managing Entities ensure that toilets are sanitary, which implies hygienic conditions, soap supply, working locks, and separate washroom facilities for women and men. Any necessary changing rooms, for example when workers have to wear a uniform, are hygienic.

If there are no legal minimum requirements with regard to areas for rest and/or eating, the Managing Entity should consult with workers and their representatives to establish such areas.

The verifiers take pictures of the state of these areas and include them in the audit report. Verifiers can also check whether there are any grievances regarding a potentially lax and/or unsanitary approach to how the above-mentioned facilities are provided.



CRITERION 5.16

→ The Managing Entity provides employees and workers with access to adequate medical care.

Intent

Access to medical care services is important for promoting and maintaining health, preventing and managing disease, reducing unnecessary disability and premature death, and achieving health equity. Managing Entities can play an important role in shaping community healthcare systems through their direct efforts concerning the structure of health benefits for their employees and workers. Providing access to healthcare has significant positive effects on individual and public health.

INDICATORS

No.	Improvement	Field	Ginnery
5.16.1	The Managing Entity offers regular free examinations and check-ups by a medical doctor to all employees and workers on a voluntary basis. These examinations can be offered at the workplace at fixed times during working hours or at the local health centres or hospitals.		✓

Guidance for Implementation

Employees and workers should not be required to pay for access to medical care. They should be able to access medical care by their own means; where this is not possible, the Managing Entity should provide suitable, cost-free transportation.

Where the Managing Entity provides medical care, the Managing Entity needs to ensure the personnel providing the service are qualified and trained to do so.



PRINCIPLE 6:

CmiA Managing Entities respect the rights of children and promote gender equality.

Introduction to the Principle

Child labour has no place in sustainable cotton cultivation and violates international human rights. Child labour reinforces poverty across generations and is intrinsically related to gender inequality. CmiA aims to protect children and young workers from work that is harmful and interferes with their schooling. CmiA works with Managing Entities, associated farmers, farmers' groups, cooperatives, and companies to support and respect this human right.

CmiA promotes agricultural practices that benefit people and the planet, leading to increased productivity, quality, and efficiency and thereby a better income. Since 27 of the 28 poorest countries in the world are in Sub-Saharan Africa—with half of the poor being children, about 70 percent of the global poor aged 15 and over having no schooling or only some basic education, and women representing the majority of the poor in most regions¹—CmiA's emphasis on children and women is a logical consequence and necessarily linked to the focus on better education and to increasing income for cotton-farming families. These economic benefits by far outweigh the

perceived economic benefits of using child labour and are, as such, an important additional incentive for farmers to no longer consider child labour.

Women make up roughly half of the agricultural workforce in Sub-Saharan Africa but often lack access to knowledge, productive assets, inputs, technology, and decision-making skills. Investing in (rural) women and ensuring that they have access to and control over resources directly contributes to reducing poverty, food insecurity, and malnutrition within these communities. CmiA therefore strives to empower women in cotton cultivation and ginning and to ensure that a gender perspective is well integrated with the operational strategy of every Managing Entity.

¹ World Bank Group: Poverty and Shared Prosperity 2020: Reversals of Fortune, available at: <https://openknowledge.worldbank.org/bitstream/handle/10986/34496/9781464816024.pdf>



CRITERION 6.1

→ The Managing Entity respects the rights of children and ensures that there is no child labour in accordance with ILO Conventions 138 and 182.

In the case of small-scale farming families, children may help on their family's farm provided that the work is not liable to negatively affect their health, safety, well-being, education, or development and that they are supervised by adults and given appropriate training.

Intent

Health, learning, and behaviour during children's early years are foundational not only for school success but also for their capacity to contribute meaningfully to society. Children's growth and development are profoundly shaped by the educational, social, and economic opportunities afforded to them by adults.

CmiA's approach to child labour is guided by the International Labour Organisation (ILO) Convention No. 138, concerning minimum age for admission to employment, and ILO Convention No. 182, concerning the prohibition and immediate action for the elimination of the worst forms of child labour. Together with the United Nations Convention on the Rights of the Child, they frame the concept of child labour and form the basis for child labour legislation.

The provisions of ILO Convention No. 138 exclude "family and small-scale holdings producing for local consumption and regularly employing hired workers". Therefore, CmiA allows for children to help their families improve their standard of living through the knowledge transmitted to them at school. On family farms, they can provide support as long as they do not perform tasks that could endanger their health or development. Thus, parents should protect their children from everything that can be harmful to their health and their well-being, and they are expected to send all their children to school, if there is one in the area. More details are provided in the Guidance for Implementation section below.

INDICATORS

No.	Core	Field	Ginnery
6.1.1	The Managing Entity has a time-bound plan for the prevention of child labour at the field level in accordance with ILO conventions 138 and 182 and applicable national laws.	✓	
6.1.2(a)	The Managing Entity establishes and implements a child labour policy that includes a clear statement against child labour. The policy also specifies under which circumstances and for which tasks children of CmiA-contracted farmers are allowed to help on the family farm. This policy is communicated to all CmiA-contracted farmers.	✓	
6.1.2(b)	The Managing Entity establishes and implements a child labour policy that includes a clear statement against child labour. This policy is communicated to all employees and workers. It is also communicated to sub-contractors as a mandatory contractual component. The Managing Entity's subcontractors must comply with the policy.		✓
6.1.3(a)	If the verifiers or competent authorities detect that CmiA-contracted farmers have employed children under 15 for any type of work or children under 18 for hazardous work in the past, the Managing Entity must take the necessary initiative to avoid that those children enter or are at risk of entering even worse forms of labour, helping them return to education wherever possible by liaising with expert organisations and/or local authorities.	✓	



No.	Core	Field	Ginnery
6.1.3(b)	If the verifiers or competent authorities detect that the Managing Entity or sub-contracted operators have employed children under 15 for any type of work or children under 18 for hazardous work in the past, the Managing Entity must take the necessary initiative to avoid that those children enter or are at risk of entering even worse forms of labour, helping them return to education wherever possible by liaising with expert organisations and/or local authorities.		✓
6.1.4	CmiA-contracted farmers do not employ children below the age of 15 (14 in certain specified countries) or under the age defined by local law, whichever is higher.	✓	
6.1.5	CmiA-contracted farmers' household members below 15 years of age (14 in certain specified countries) or under the age defined by local law, whichever is higher, may help on their family's farm after school or during holidays only under the following conditions: <ul style="list-style-type: none"> • The child's work is structured so as to enable him/her to attend school and have leisure time • The child's work is appropriate for his/her age and physical condition • The child does not perform tasks that are hazardous for him/her • The child does not work for long hours or under dangerous or exploitative conditions • The child is supervised and guided by his/her parent or legal guardian <i>The child's school and work time, including the commute between home and school, shall not exceed a combined total of ten hours per day.</i>	✓	
6.1.6	The Managing Entity does not employ workers directly or indirectly (through sub-contracting) below the age of 15 (14 in certain specified countries) or below the minimum age for employment defined by local law, whichever is higher. Robust age-verification mechanisms are part of the recruitment process to ensure compliance with the minimum age.		✓
6.1.7(a)	Hazardous work at the field level is not performed by anyone under the age of 18.	✓	
6.1.7(b)	Hazardous work at the ginnery level is not performed by anyone under the age of 18.		✓
No.	Improvement	Field	Ginnery
6.1.8	The Managing Entity conducts spot checks at CmiA farms to check the age of farm workers, especially in labour-intensive periods during the cotton season. Records of the checks are kept for at least two years.	✓	
6.1.9	The Managing Entity encourages the establishment of child-protection or monitoring committees in communities of CmiA-contracted cotton farmers. It documents where such committees exist.	✓	
6.1.10	The Managing Entity cooperates with a suitable local partner to establish a complaint and compensation mechanism for child-labour abuses.	✓	
6.1.11	The Managing Entity promotes school enrolment and school attendance of children from CmiA households by training CmiA-contracted farmers.	✓	



Guidance for Implementation

Not all work done by children is classified by the ILO as child labour that should be eliminated. Work that does not affect children's health and personal development or schooling can be positive. Whether a job is classified as child labour depends on the child's age and the type and hours of work performed.

ILO Conventions and National Legislation

In reality, there is no clear line separating "good" children's work from "bad" child labour. It is more practical to refer to two approaches to defining child labour, as does the ILO in its conventions on child labour (C138 on minimum age and C182 on the worst forms of child labour). These approaches focus on age and activity, respectively.

- **Age:** According to the first approach, children under a certain age should not work. ILO Convention 138 sets this age at 15 (14 in certain developing countries) or at statutory school-leaving age, whichever is higher. The two main exceptions are: a lower minimum age of 13 (twelve years in certain developing countries) for "light work"—which neither harms a young person's development nor prejudices school attendance—and a higher minimum age of 18 for hazardous work, defined below.
- **Activity:** According to the second approach, child labour is defined according to its negative effect on children. While "light work" may be undertaken by younger workers, starting at the age of 13, "hazardous work" should not be performed by anyone under age 18. Hazardous work is work that jeopardises children's physical or psychological well-being due to the nature of the working conditions. This aspect is key to understanding the concept of child labour in cotton because several activities relating to cotton cultivation may be deemed hazardous, including applying pesticide and carrying heavy weights during harvest. Convention 182 calls on ILO member countries to determine, through national legislation, the list of activities that would give rise to hazardous child labour if performed by a worker under the age of 18.

In line with the Minimum Age Convention (ILO Convention 182), full-time attendance at school should be effectively ensured up to an age at least equal to that specified for admission to employment.

Hazardous work includes but is not limited to: handling pesticides, hazardous chemicals, or residues; operating or helping operate dangerous machinery or tools; and activities that require high physical exertion. No child or young worker shall carry heavy loads or work on steep slopes, on any high surface, or in high places. Night work for children or young workers is also prohibited. Children

or young workers shall always be under the supervision of a responsible adult in order to ensure that the children or young adults understand how to do their tasks safely and practise safe work habits.

Children of small-scale farmers shall not work during school hours. The child's school and work time, including the commute between home and school, shall not exceed a combined total of ten hours per day. They may only perform light work duties that do not threaten their health or safety. If under the age of twelve years, they may not work at all, although they may participate in agricultural tasks that are traditional for children of that age and in that area and that are undertaken for the purpose of transmission of the family's or local culture.

The CmiA verification has to pay special attention to the school attendance situation of farmers' children and to activities undertaken to improve school enrolment and attendance rates. Although the provision of school education is the primary responsibility of the government and not of the Managing Entity, Managing Entities can play an important role in encouraging school attendance, e.g. by raising awareness of the benefits a good school education will have for the next generation of cotton farmers or through concrete support for school infrastructure or material.

Ginneries: A robust age-verification mechanism needs to be part of the recruitment process. This can involve requesting to see a national identity card during recruitment and including a copy of the card in the contract documents. This must be done in a manner that is not in any way degrading or disrespectful to the worker.



CRITERION 6.2

→ The Managing Entity promotes gender equality, empowers women, and raises awareness on gender issues amongst CmiA-contracted farmers, employees, and workers.

Intent

Gender equality is a precondition and accelerator for progress in all areas. All women shall have equal opportunities to pursue well-being and to shape decisions affecting their lives. Achieving gender equality was integrated into the 2030 Agenda, which was endorsed by all UN member states in August 2015. It offers an opportunity to drive lasting change for women's rights and equality and to bring transformative change to women's and men's lives.

In developing countries, women in agriculture spend a considerable amount of time planting, weeding, ridging, and harvesting while simultaneously completing their "regular" chores like making meals and caring for children, the elderly, and the sick.

CmiA strives to empower women in cotton cultivation and ginning and to ensure that a gender perspective is well integrated with the operational strategy of every Managing Entity.

By encouraging the fair representation of women in cotton cultivation, in training, among lead farmers, and among the (extension) staff of Managing Entities, CmiA advocates better visibility of women in cotton cultivation at the local level and promotes positive changes in attitudes, behaviours, and practices. The learning-by-doing environment, e.g. using demo plots, can support women's critical thinking, decision-making, and communication skills. In terms of leveraging and acknowledging women's talents, their skills in problem-solving and innovation promise to yield important economic and social gains.

Closing gaps in women's access to agricultural inputs (including time-saving equipment, finance, (household) labour, and extension services) and overcoming land constraints (including small land size, unequal land tenure systems, and property rights) can help achieve gender equality in agriculture across Sub-Saharan Africa¹. Evidence shows that when women are empowered, farms are more productive, natural resources are better managed, nutrition is improved, and livelihoods are more secure².

INDICATORS

No.	Core	Field	Ginnery
6.2.1(a)	The Managing Entity has a written gender policy that is communicated to CmiA-contracted farmers.	✓	
6.2.1(b)	The Managing Entity has a written gender policy that is communicated to employees and workers.		✓

¹ African Development Bank Group (AfDB): Africa Economic Brief Vol. 7 Issue 3: Gender equality in agriculture: What are really the benefits for sub-Saharan Africa? Available at: https://www.afdb.org/fileadmin/uploads/afdb/Documents/Publications/AEB_Vol_7_Issue_3_Gender_equality_in_agriculture.pdf

² FAO: Leaving no one behind: Empowering Africa's rural women for Zero Hunger and shared prosperity. Available at: <http://www.fao.org/documents/card/en/c/CA1506EN>



No.	Core	Field	Ginnery
6.2.2	The Managing Entity provides male and female cotton growers with equal access to cotton-growing contracts, inputs, and input pre-financing.	✓	
6.2.3	If the holder of a CmiA farming contract is female, payments are made directly to the woman or the couple (not to the husband or male partner alone).	✓	
6.2.4	The Managing Entity ensures equal access to and participation in extension and training for male and female CmiA-contracted cotton farmers.	✓	
6.2.5	The Managing Entity promotes equal participation of men and women in training. Records of training or workshops are kept for at least one year.		✓
No.	Improvement	Field	Ginnery
6.2.6	The Managing Entity has a gender focal person. The gender focal person is in charge of the overall coordination of matters of gender equality or female empowerment throughout the company. She/he reports directly to or is a member of the senior management. The role and tasks of the gender focal person are included in the employment contract or job description. The gender focal person has the relevant knowledge and experience to perform the assigned tasks.	✓	
6.2.7	The Managing Entity sensitises CmiA-contracted farmers to issues of gender equality, e.g. through training sessions or workshops. Records of training or workshops are kept for at least one year.	✓	
6.2.8	The Managing Entity increases the number of female CmiA facilitators (e.g. extension agents and lead farmers).	✓	
6.2.9	The Managing Entity supports the establishment, organisation, and activities of women's groups for female cotton growers. Up-to-date records of existing women's groups are kept.	✓	
6.2.10	The Managing Entity sensitises employees and workers on gender equality, e.g. through training sessions or workshops.		✓

Guidance for Implementation

Encouragement of women can take place at various levels but should always show an improvement of the current situation. It should always consider the cultural context in which the Managing Entity operates.

For example, this can mean that:

- Female farmers are encouraged to grow cotton on their own behalf and to sign independent contracts
- Women are encouraged to work as trainers or lead farmers and/or that the Managing Entity actively seeks to employ women as extension staff
- The formation of female farmer groups (women clubs) or of farmer groups including women is

encouraged and that these groups are supported with know-how and resources. This does not only relate to cotton farmer groups but can also include support of other female farmer groups, e.g. in vegetable production, if there is a direct connection to cotton growing households

- The Managing Entity is actively engaged in granting female farmers access to agricultural training and inputs and/or other training inputs, e.g. literacy training courses



PILLAR 3: Planet

Introduction to the Planet Pillar

→ While the sustainability concept threads together economic, social, and environmental dimensions and acknowledges that decisions and approaches are related and have both synergies and trade-offs, the urgency for action on climate change, biodiversity loss, and environmental protection is underlined on an almost daily basis by both scientific knowledge and the impact on plants, animals, and people. The world is facing a climate emergency that is outpacing the global communities' efforts to address it, leading to significant risks to health, livelihoods, food security, water supply, human security, and economic growth.

Climate change has disproportionate effects on the poor and could drive millions more people into poverty. Global warming is expected to decrease crop yields in many areas, including regions in Sub-Saharan Africa, exacerbating food insecurity, undernutrition, and stunting in impoverished communities.

In addition, the world is facing dire challenges in addressing biodiversity and environmental protection. Around one

million animal and plant species are threatened with extinction. Deforestation continues, and land degradation and desertification have increased. In many regions, water quality has worsened due to organic and chemical pollution.

These are the circumstances currently facing cotton growers and African small-scale farmers, who are left with no choice but to find a way to adapt. At the same time, they also contribute—albeit at a below-average rate—to the impact of man-made influences on the environment.

CmiA's goal is to minimise the negative environmental impacts of cotton cultivation under its standard, including the adverse effects of crop protection. An integrated strategy is needed to tackle climate change, biodiversity loss, and overall environmental degradation and to achieve more resilient livelihoods, health and wellbeing for communities, and a sustainable balance between wild and managed lands and species.



PRINCIPLE 7:

CmiA Managing Entities use land responsibly, enhance biodiversity, and protect the climate and the environment.

Introduction to the Principle

Since the foundation of the initiative, environmental protection has been a core element of CmiA's mission. With regard to the Managing Entities, compliance with laws was the top priority at the beginning. Over time, priorities expanded to include environmental risk assessments and the resulting areas of action for the Managing Entities. While the requirements of the CmiA standard always focus on the feasibility of implementation by the Managing Entities, CmiA believes it is essential to address the global challenges facing the environment and our planet.

Since Sub-Saharan Africa has one of the fastest-growing populations in the world, the continued conversion of natural vegetation into agricultural land seems inevitable. This has a massive impact on biodiversity.

Biodiversity refers to the diversity of life at all levels of organisation, from genes to species to ecosystems. Land-use change alters biodiversity at all of these levels, e.g. with reduced habitat from land-use change decreasing population sizes and reducing genetic diversity within a species. Habitat loss and degradation is the largest single source of pressure on biodiversity worldwide. Habitat loss is the direct conversion of natural habitats for human use; degradation is the direct alteration or fragmentation of natural habitats for human use. Habitat loss largely reflects the conversion of natural habitats to agriculture and unsustainable forest management. The encroachment of human activity into natural areas can also lead to human-wildlife conflict.

For this reason, CmiA requires respect for any areas and natural reserves that are under special protection due to their unique characteristics and importance for the conservation of biodiversity, habitat, or wildlife.

Land used for the production of crops has typically been cleared of natural habitats, thereby having a significant negative impact on biodiversity. CmiA aims to ensure that biodiversity and natural habitats are maintained and enhanced. This can be achieved by increasing yields, which helps reduce pressure to open up new land, and through the promotion of practices like integrated production and pest management (IPPM), crop rotation, and conservation agriculture. Through their extension services, Managing Entities can let CmiA-contracted farmers know that a more diverse habitat supports a wider range of species and thus more competitors for potential pests. Enhancing biodiversity creates a win-win situation for fauna and flora on and around the farm and for farmers, whose yields and therefore profits are increased.

Conserving and sustainably managing biodiversity are also critical to addressing climate change. Through the ecosystem services biodiversity provides, it contributes to both the mitigation of and adaptation to climate change.

Cotton production is both a contributor to climate change and subject to its impacts. CmiA therefore strives to enhance the resilience of farmers by adapting to climate change while also increasing efforts to mitigate climate change by reducing the emissions created through cotton cultivation and ginning.



CRITERION 7.1

→ The Managing Entity responsibly manages and reduces its environmental impact.

Intent

The Managing Entity has identified the main negative environmental impacts at both the field and ginnery levels and implements measures to mitigate them. This includes but is not limited to noise, dust, water use, wastewater, waste, and energy consumption, as applicable.

Managing Entities comply with all applicable environmental laws and guidelines. Furthermore, they endeavour to ensure the continuous improvement of the environmental conditions under which they operate. When making decisions about operations, the principle of sustainability must be followed, and consideration must be given to the responsible use of natural resources, clean production, the prevention of environmental pollution, and the sustainable development and use of materials, technologies, and products.

INDICATORS

No.	Core	Field	Ginnery
7.1.1(a)	The Managing Entity has personnel within its organisation who are directly responsible for environmental performance at the field level and who possess the knowledge, skills, and experience necessary to perform their tasks. They report to senior management and have adequate time and resources to carry out their duties.	✓	
7.1.1(b)	The Managing Entity has personnel within its organisation who are directly responsible for environmental performance at the ginnery level and who possess the knowledge, skills and experience necessary to perform their tasks. They report to senior management and have adequate time and resources to carry out their duties.		✓
7.1.2(a)	The Managing Entity conducts regular environmental risk assessments at the field level. The assessment forms the basis for an environmental management plan, which defines measures to eliminate or mitigate the risks and impacts. The environmental assessment includes but is not limited to: <ul style="list-style-type: none"> • Hazardous substances • Waste • Fuel use • Land use The environmental management plan is maintained and reviewed when necessary, at least every two years.	✓	
7.1.2(b)	The Managing Entity conducts regular environmental risk assessments at the ginnery level. The assessment forms the basis for an environmental management plan, which defines measures to eliminate or mitigate the risks and impacts. The environmental assessment includes but is not limited to: <ul style="list-style-type: none"> • Air emissions • Waste • Hazardous substances • Fuel and energy use • Noise • Land use The environmental management plan is maintained and reviewed when necessary, at least every two years.		✓



No.	Core	Field	Ginnery
7.1.3	The Managing Entity collects and separates waste from the ginnery according to local requirements. Waste must be properly disposed of in municipal garbage collection systems where available.		✓
No.	Improvement	Field	Ginnery
7.1.4(a)	The environmental management plan incorporates a monitoring protocol to track the effectiveness of the mitigation measures through a set of indicators (e.g. waste or fuel consumption).	✓	
7.1.4(b)	The environmental management plan for the ginnery incorporates a monitoring protocol to track the effectiveness of the mitigation measures through a set of indicators (e.g. waste or energy consumption).		✓
7.1.5	The Managing Entity has a waste management plan that includes strategies in waste reduction, recycling, reuse, and disposal alternatives. The Managing Entity identifies the main types of waste, ways to reduce and reuse waste materials if applicable, and how to dispose of them in the best available way. The Managing Entity develops measures for waste reduction and documents their implementation and impact.		✓
7.1.6	The Managing Entity applies appropriate emissions-control techniques for operations that generate air pollutants. Control techniques include ventilation, absorption, scrubbing, and noise and vibration reduction. The Managing Entity measures the emission reduction achieved through control techniques.		✓
7.1.7	The Managing Entity measures and monitors the energy consumption in its ginneries and develops a plan for energy reduction and recovery. Where appropriate, climate-smart energy sources are used. A system to measure achievements is in place (cf. indicator 7.1.4(b)).		✓

Guidance for Implementation

Environmental impact assessments are usually related to new operations and therefore completed at the initial stage of operations. However, CmiA requires Managing Entities to regularly review their environmental management plans and conduct regular studies.

Depending on national legislation, these can include annual occupational health and safety audits, annual noise surveys, annual fire safety inspections, and the disposal of waste for ginneries.

At the field level, many aspects for environmental risk assessment are already covered by a number of plans required under this standard, like the continuous-improvement plan (cf. criterion 2.5), the biodiversity

management plan (cf. criterion 7.4), the soil management plan (cf. indicator 8.3.1), and the IPPM plan (cf. criterion 9.1). Reporting on this criterion should include conclusions regarding the main environmental risks identified at the field and ginnery levels and activities planned to mitigate these risks. Special areas of risk at ginneries include oil plants and acid delinting facilities, if present at the same location.

Verifiers' reports should also include measures actively implemented by the Managing Entity to reduce greenhouse gas emissions for the purpose of climate change mitigation.



CRITERION 7.2

→ The Managing Entity ensures the responsible use of land.

Intent

FAO statistics show that land-use change and rapid land-use intensification have supported the increasing production of food, feed, and fibre. Since 1961, cotton fibre production has increased by 162 percent (as of 2013)¹. However, these production gains have largely been achieved at the expense of biodiversity. Production gains are generated either by cropland expansion or by intensification. Both strategies pose major threats to many common as well as IUCN red-listed species. While cropland expansion into uncultivated areas threatens biodiversity mainly through the loss and fragmentation of natural habitats, land-use intensification threatens multiple species due to habitat homogenisation and high inputs of agro-chemicals, amongst other factors.

CmiA therefore aims to minimise negative impact on areas with the highest conservation value. The clearest definition and consensus in society on such valuable areas is provided by designated protected areas. By identifying hotspots of potential future conflicts, CmiA demonstrates where conservation prioritisation is needed in order to balance agricultural production with conservation goals. Protected areas (PA) and protection zones have been defined for specific conservation purposes, for example to conserve and protect biodiversity and ecosystems, to provide habitat and protection for endangered species, and to protect watersheds. Depending on the specific purpose of conservation, different types of protected areas and protection zones exist, including national parks, wildlife refuges, and forestry reserves.

The most important reference points for CmiA as set by international conventions are the areas defined by the IUCN as categories I-IV, important bird areas (IBA), UNESCO world heritage sites, and sites defined by the Ramsar Convention on Wetlands.

Aspects relevant to biodiversity-sensitive intensification, which avoids land-use change, are covered by other criteria and indicators of this standard, such as the biodiversity management plan (cf. criterion 7.4), overall soil management (cf. criterion 8.3), and crop rotation (cf. indicators 8.3.5, 8.3.6, and 8.3.7).

¹ IPCC Special Report on Climate Change, Desertification, Land Degradation, Sustainable Land Management, Food Security, and Greenhouse Gas Fluxes in Terrestrial Ecosystems (2019). Available at: https://www.ipcc.ch/site/assets/uploads/2019/08/4.-SPM_Approved_Microsite_FINAL.pdf



INDICATORS

No.	Core	Field	Ginnery
7.2.1	<p>An up-to-date overview map of the production areas and the location of the ginneries is available.</p> <p>The Managing Entity collaborates with national environmental authorities to identify and map out protected areas and areas with a high conservation value (HCV) within cotton-growing areas cultivated by contracted farmers. Such areas include:</p> <ul style="list-style-type: none"> • Primary forest and other intact forest landscapes • Important bird areas (IBA) • UNESCO world heritage sites • Strict nature reserves (IUC Ia) • Wilderness areas (IUC Ib) • National parks (IUC II) • Natural monuments or features (IUC III) • Habitat/Species management areas (IUC IV) • Wetlands (Ramsar Convention) • Rivers and riparian buffer areas 	✓	
7.2.2	<p>Cotton is only produced on land that is classified as agricultural and/or approved for agricultural use under national legislation. Protected areas and areas with a high conservation value (HCV) are respected (cf. indicator 7.2.1).</p>	✓	
7.2.3	<p>In the event of any conversion from non-agricultural land to agricultural land, the Managing Entity ensures that CmiA-contracted farmers:</p> <ul style="list-style-type: none"> • have the right to use the land (ideally holding land tenure); • maintain a ten-metre buffer zone of perennial vegetation with open water (river, stream, ditch, canal, pond, or lake); • ensure that no cotton is cultivated in the locally mandated buffer zone for officially designated protected areas; and • ensure that no cotton is cultivated in the locally mandated buffer zone for intact forest landscapes. 	✓	
7.2.4	<p>In the event of any conversion from non-agricultural land to agricultural land, the Managing Entity can document that CmiA-contracted farmers respected the rights of local communities and indigenous people (in line with ILO Convention 169 on the Rights of Indigenous People).</p>	✓	

Guidance for Implementation

Refer to national legislation and governance for the management of natural protected areas and protection zones. It is recommended that external stakeholders are consulted, especially the institutes responsible for the management of protected areas.

The cotton growing areas, as identified by the Managing Entity, should be checked against a map of protected areas in order to identify possible risks of non-compliance. Areas close to protected areas should be regularly sampled during on-site verification.

Established regulations may allow certain economic activities in some types of protection zones (e.g. game management areas or buffer zones). While it is the main responsibility of the governmental institutions to manage and monitor protected areas and protection zones, Managing Entities should seek dialogue with these governmental institutions, be aware of regulations, and inform and sensitise the population and farmers living in bordering areas.

In any areas rated as biodiversity hot spots, cotton cultivation should be included in the risk-based sample during on-site verification.



CRITERION 7.3

→ The Managing Entity avoids making a negative impact on protected areas and on areas with a high conservation value and assists communities in managing natural resources sustainably.

Intent

This criterion is interlinked with criterion 7.2, which addresses the responsible use of land.

The High Conservation Value (HCV) concept was originally developed by the Forest Stewardship Council (FSC) in 1999 for use in forest management certification. In 2005, the HCV Resource Network was established, and its scope was widened from “HCV Forests” to “HCV Area” (HCVA)¹.

Areas with a high conservation value are natural habitats of outstanding significance or critical importance due to their high biological, ecological, social, or cultural value. These areas need to be appropriately managed in order to maintain or enhance those identified values. There are six HCV categories, ranging from biodiversity, habitats, and ecosystem services to livelihoods and cultural values. An HCV approach involves identifying and maintaining these special values over time through management and monitoring.

Areas of high conservation value are covered under this standard. However, the practical implications of identifying HCV areas in CmiA countries of operation and in a small-scale farmer context remain challenging. However, areas covered under HCV categories 1–3 are largely equivalent to the areas cited above, under criterion 7.2.

INDICATORS

No.	Core	Field	Ginnery
7.3.1	Where protected areas and HCV areas are identified, the Managing Entity complies with existing official management and monitoring plans in order to maintain those values.	✓	
7.3.2	No cotton ginning occurs within two kilometres of protected areas unless it is allowed under an official management plan for the area. The official management plan is implemented.	✓	
No.	Improvement	Field	Ginnery
7.3.3(a)	Threatened and endangered species in the production area of CmiA-contracted farmers are identified and respected.	✓	
7.3.3(b)	Threatened and endangered species on the premises of the ginneries are identified and protected.		✓
7.3.4	The Managing Entity assists communities of CmiA-contracted farmers in managing natural resources and lead conservation initiatives of their own, e.g. through capacity building.	✓	

¹ <https://www.biodiversitya-z.org/content/high-conservation-value-areas-hcva>



Guidance for Implementation

The six categories for HCVs are defined by the HCV Resource Network as follows:

- **HCV 1: Species diversity:** Concentrations of biological diversity including species and rare, threatened, or endangered species that are significant at global, regional, or national levels. *For example, this can include the presence of globally threatened bird species. Managing Entities can use the IUCN Red List website to identify threatened or endangered species recorded in the cotton growing regions of CmiA-contracted farmers or on the premises of the gineries: <https://www.iucnredlist.org/search>*
- **HCV 2: Landscape-level ecosystems and mosaics:** Large, landscape-level ecosystems and ecosystem mosaics that are significant at global, regional, or national levels and that contain viable populations of a great majority of the naturally occurring species in natural patterns of distribution and abundance. *One example is a large tract of grassland with large mammals as well as smaller species.*
- **HCV 3: Ecosystems and habitats:** Rare, threatened, or endangered ecosystems, habitats or refuges. *Examples include a rare forest type and a rare freshwater swamp.*
- **HCV 4: Ecosystem services:** Basic ecosystem services in critical situations, including the protection of water catchment areas and the management of erosion of vulnerable soils and slopes. *One example is a forest that is located on a steep slope and poses a landslide risk for the village below.*
- **HCV 5: Community needs:** Sites and resources fundamental for satisfying the basic needs of local communities or indigenous peoples (including livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples. *This might include a site that is an important source of medicinal or edible wild plants for communities who depend on these resources as part of their basic household economy.*
- **HCV 6: Cultural values:** Sites, resources, habitats, and landscapes of global or national cultural, archaeological, or historical significance and/or of critical cultural, ecological, economic, or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples. *For example, this can include sacred burial grounds.*



CRITERION 7.4

→ The Managing Entity has a biodiversity management plan and promotes ecological diversity.

Intent

Biodiversity is vital for human health and livelihoods. Living organisms—plants, animals, and microorganisms—interact to form complex, interconnected webs of habitats and ecosystems, which, in turn, support people and all life on earth in a wide variety of ways.

In an agricultural context, on-farm biodiversity is what constitutes agro-ecosystems, i.e. the variety and variability of microorganisms, plants, and animals at the genetic, species, and ecosystem levels that are necessary to maintain the composition of an agro-ecosystem as well as its essential and underlying functions.

To reduce their impact on biodiversity, Managing Entities assist CmiA-contracted farmers in conserving or enhancing natural habitats on their land and in adopting practices to protect habitats surrounding their farm. Restoring degraded areas or establishing riparian buffers and other appropriate management practices can enhance the presence of living organisms, both on the farm and in areas adjacent to the cotton fields or even somewhat farther away. Conserving and ultimately enhancing natural habitats, and therefore biodiversity, helps sustain the breeding, foraging, and migratory activities of many species.

INDICATORS

No.	Core	Field	Ginnery
7.4.1	The Managing Entity has a progressive plan to manage biodiversity that addresses the following components: (1) Identifying and restoring degraded areas (2) Enhancing populations of beneficial insects as per the integrated production and pest management (IPPM) plan (cf. criterion 9.1) (3) Enhancing crop rotation (cf. indicators 8.3.6 and 8.3.7) (4) Protecting riparian areas (cf. indicators 7.4.5 and 7.4.6)	✓	
7.4.2	A timeline for implementing the four components of the biodiversity management plan is established. Responsibilities and operating procedures are defined and agreed upon by the executive management.	✓	
7.4.3	The Managing Entity trains CmiA-contracted farmers to identify and restore degraded areas on their farmland.	✓	
7.4.4	The percentage of CmiA-contracted farmers taking measures to restore degraded areas in accordance with the biodiversity management plan.	✓	



No.	Improvement	Field	Ginnery
7.4.5	The Managing Entity regularly trains CmiA-contracted farmers to protect bodies of water, including by maintaining and/or restoring appropriate riparian buffer zones.	✓	
7.4.6	The percentage of CmiA-contracted farmers taking measures to protect bodies of water and wetlands in and adjacent to the farm, including by maintaining and/or restoring appropriate riparian and other buffer zones in accordance with the biodiversity management plan.	✓	
7.4.7	The Managing Entity regularly trains CmiA-contracted farmers to protect any rare, threatened, or endangered species that may be affected in relation to water or water-related habitats.	✓	
7.4.8	<p>The Managing Entity promotes ecological diversity by supporting small-scale farmers to protect and enhance on-farm and/or neighbouring habitats and ecosystems. Examples include:</p> <ul style="list-style-type: none"> • planting trees and/or flowers; • safeguarding biological corridors; and • preserving semi-natural areas (e.g. hedges or meadows). 	✓	

Guidance for Implementation

Managing Entities need to develop biodiversity management plans in order to support farmers with conserving and enhancing biodiversity on and around their farms. The main objectives for a biodiversity management plan are:

- To better understand which animals, plants, and (ideally) microorganisms are present on and around farms in order to create awareness for the interconnection between these resources, the environment, and farming practices and to gain insight into the level of degradation on and around farm
- To define appropriate approaches to managing degraded areas—including soil-compacted, eroded, or nutrient-depleted areas—and to restoring them over time, thereby helping enhance biodiversity while increasing yields in these areas
- To improve knowledge about natural pest control techniques and about balancing pest and beneficiary organisms on a farm, as these are important drivers for biodiversity. To achieve this balance, techniques and tools that minimise harm to pollinators and other beneficial insects—such as traps, lures, repellents, or botanical insecticides— can be incorporated into IPPM strategies (cf. criterion 9.1)
- To improve crop rotation management, as diverse rotational systems raise soil quality by improving soil aeration and drainage and by increasing the range and population size of microorganisms. Crop rotation also increases the range and number of beneficial insects, contributing to improved farm biodiversity
- To protect and actively set riparian buffer strips, as these vegetated areas provide aquatic and wildlife habitat, protect water resources from pollution, and provide bank stabilisation



CRITERION 7.5

→ The Managing Entity assists CmiA-contracted farmers in adapting to climate change and fosters practices that reduce greenhouse-gas emissions.

Intent

Cotton production, particularly in the tropical regions of the world, including Sub-Saharan Africa, is likely to suffer under predicted rising temperatures, decreased soil moisture, and more extreme weather events (like flooding and droughts). The cotton value chain both contributes to climate change and is at risk from its impacts. CmiA aims to enhance cotton farmers' resilience to climate change and to actively promote the transformation and reorientation of agricultural systems in a changing climate while developing more sustainable production activities and reducing the environmental footprint of cotton cultivation and ginning.

By far the greatest technological potential for reducing emissions from agricultural production lies in carbon sequestration in the soil, which is mainly achieved through changes to good agricultural practices, such as minimising the use of synthetic fertilisers or recycling cotton crop residues for soil fertility management instead of burning them. Further reductions in emissions can be achieved through increasing efficiency in agricultural inputs (e.g. fertilisers, pesticides, or fuel for tractors or other heavy equipment). At ginneries, the electricity supply could be shifted towards renewable energy, e.g. solar power.

As climate change alters the economics of production, cotton farming communities need to be aware of different adaptation strategies, including planting different crops and seeking additional, non-farm income streams. Training must consider which agronomic practices are most important for increasing the resilience of the cotton cultivation system itself.

Higher temperatures will eventually reduce yields and increase the prevalence of pests and diseases, even though cotton has a certain resilience to high temperatures and drought due to its vertical tap root. Weed control will become more critical to achieving optimal cotton plant development and yields as higher atmospheric CO₂ levels lead to weeds growing more vigorously, especially at the seedling stage.

Reforestation projects can capture carbon by planting trees. This can be combined with agricultural production to create sustainable landscapes and can also provide plant material that is useful for pest or disease management.



INDICATORS

No.	Core	Field	Ginnery
7.5.1	The Managing Entity regularly collects data on precipitation patterns (e.g. volume and inter- and intra-annual variations and trends) for its areas of operation, using this information to increase farmers' resilience to climate change, e.g. by adapting recommendations for the scheduling of agricultural practices (cf. indicator 11.1.1 on good agricultural practices).	✓	
7.5.2	The Managing Entity trains CmiA-contracted farmers in farming methods and best practices that help them adapt to the impact of climate change, including but not limited to good agricultural practices (cf. indicator 11.1.1), crop diversification, and soil management (cf. criteria 12.1 and 8.3).	✓	
No.	Improvement	Field	Ginnery
7.5.3	The use of fire for preparing land, replanting, or destroying crop residues is avoided, except in situations where national law requires otherwise.	✓	
7.5.4	The Managing Entity seeks opportunities for investments in projects to reduce greenhouse-gas emissions or to adapt to climate change at the farmer level. Such opportunities include: a) reforestation/tree planting projects; and/or b) the installation of water-harvesting systems for precipitation.	✓	

Guidance for Implementation

The following measures can help farmers adapt to climate change:

- Adjusting sowing dates to offset moisture stress during the warm period, to prevent pest outbreaks, and to make the best use of the length of the growing season
- Preventing soil erosion and completely abandoning the practice of burning cotton crop residue
- Favouring a cropland design that promotes plant diversity and soil fertility management, e.g. by including cover crops
- Minimising soil tillage and fallow periods in order to prevent soil erosion, specifically the loss of organic matter and humidity in the soil



PRINCIPLE 8:

CmiA Managing Entities provide GMO-free cotton seeds and care for water and soil.

Introduction to the Principle

In line with the precautionary principle¹, CmiA requires Managing Entities to provide GMO-free cotton seeds to farmers. So far, there is no robust research into the long-term effects on farmer livelihoods and the environment. Evidence from countries where small-scale farmers use or have used genetically modified crops points to higher economic, social, and financial risks; to the increased use of pesticides, brought about by resistance to commonly used pesticides; and to outbreaks of secondary pests. In addition, there are concerns over seed sovereignty, biodiversity, and uncontrolled contamination of non-GM crops. CmiA considers the introduction of GMOs in a small-scale farming context not to be conducive to improving livelihoods or to protecting the environment and excludes the use of GMOs in its standard, not only to minimise the risks for small-scale farmers but also in view of the widespread consumer rejection of GMOs in agriculture.

Soil and water are essential natural resources for agricultural production. From a sustainability perspective, the responsible use of these resources is crucial. A rising world population leads to continuously growing competition for natural resources such as land and water, which are becoming increasingly scarce. The depletion of clean water reserves and fertile soil has become a risk factor for agriculture worldwide.

Three-quarters of the world's harvested cotton is cultivated under irrigation. CmiA cotton production prohibits the withdrawal of ground or surface water, called "blue water", for the irrigation of cotton. Instead, CmiA relies exclusively on rain-fed production methods. This gives CmiA cotton a competitive advantage over average global cotton production.

Ruling out irrigation, however, makes it even more important to manage water effectively and efficiently in the context of growing water scarcity and changing or erratic rainfall patterns, both connected to climate change. Measures to optimise and improve the use of water are vital for the sustainability of cotton farming. Relevant measures in this context aim at increasing the infiltration rates of rainwater and improving humidity retention in soil.

The expansion and intensification of cotton cultivation might lead to soil degradation. Agricultural strategies for sustainable cotton production need to focus on the protection, conservation, improvement, and restoration of soil fertility. Through the application of sustainable soil and water conservation practices and through the provision of organic fertiliser, cotton cultivation can significantly contribute to soil fertility, and lessons learnt can be transferred to other cultivated crops.

¹ The Cartagena Protocol on Biosafety reflects a fundamental concept known as the precautionary approach. In the case of the Biosafety Protocol, this concept means that a government may decide on the basis of precaution not to permit a particular GMO to be imported across its borders. This is the case even if there is insufficient scientific evidence about the GMO's potential adverse effects. The Protocol applies precaution not just to biodiversity but to potential risks to human health as well. It also gives importing countries the right to take into account socioeconomic concerns. Further details are available at: <https://wedocs.unep.org/bitstream/handle/20.500.11822/9993/cpbs-unep-cbd-en.pdf?sequence=1&%3BisAllowed=>



CRITERION 8.1

→ CmiA cotton is not genetically modified and no irrigation from surface or groundwater sources is used for its cultivation.

Intent

No GMOs

Following the precautionary principle, CmiA cotton is not genetically modified. There are increasing concerns over insect and weed resistance to Bt¹ toxins and herbicides. Widespread use of Bt cotton in some regions of the world has already created resistance among bollworms, and the emergence of secondary pests, such as whitefly, has been observed². Secondary pest attacks can result in supplementary pesticide applications being needed, which comes with extra costs for farmers. In addition, the growing resistance of bollworms to Bt also raises concerns over food security, as these bollworms also attack food crops like chickpeas, pigeon peas, or okra.

CmiA prohibits the use of genetically modified seed for cotton cultivation, meaning that GMO-free cotton seeds must be provided to CmiA-contracted farmers. Availability and accessibility of GM crop seeds, seed dissemination and price, and the lack of adequate information are challenges faced by small-scale farmers. Uncertainty about the financial benefits of GM adoption is a significant risk to farmers who also experience rising production costs (related to inputs and equipment, for example). Due to higher seed costs for GMO seeds, crop failure can pose significant risk of debt and even bankruptcy.

Furthermore, biosafety regulations would also require limiting the risk of contamination and therefore putting preventive measures in place, for example by creating buffer zones around fields or through record-keeping, GM testing, segregation, maintenance, and cleaning at all steps of the supply chain. This does not seem feasible in a small-scale farming context.

No Irrigation

Rainfed agriculture depends on infiltrated rainfall, called “green water”, which is stored in the upper layers of the soil and is available to plant roots. Though rainfed agriculture is a given—95 percent of farmed land in Sub-Saharan Africa is rainfed—the exclusion of irrigation under the CmiA standard is a conscious decision. With water becoming an increasingly scarce resource and cotton being a drought-tolerant crop, CmiA relies exclusively on rainfed production methods. A holistic approach that includes proper management of natural resources is needed for the agricultural system's productivity to be enhanced and for poverty to be reduced without causing further degradation of the natural resource base. There is a significant opportunity to maximise the capture, storage, and use of green water and to unlock the potential of enhanced rainfed agriculture. This builds up climate resilience and moves farmers towards sustainable livelihoods, development, and growth.

¹ Bt stands for *Bacillus thuringiensis*, a natural bacterium that produces over 200 different Bt toxins, each harmful to different insects. A transgene coding for Bt toxin has been inserted into cotton, causing it to produce this insecticide in its tissues.

² For further details, see: Kranthi, K. R. & Stone, G. D. Long-term impacts of Bt cotton in India. *Nat. Plants* 6, 188–196 (2020). Available at: <https://doi.org/10.1038/s41477-020-0615-5>. Vonzun, S.; Messmer, M.M.; Boller, T.; Shrivastava, Y.; Patil, S.S.; Riar, A. Extent of Bollworm and Sucking Pest Damage on Modern and Traditional Cotton Species and Potential for Breeding in Organic Cotton. *Sustainability* 2019, 11, 6353. Available at: <https://doi.org/10.3390/su11226353>



INDICATORS

No.	Core	Field	Ginnery
8.1.1	The Managing Entity must provide GMO-free cotton seeds. In countries where national legislation allows the cultivation of genetically modified cotton, the Managing Entity can guarantee that CmiA-contracted farmers do not receive any GMO seeds and that clear segregation between GMO and non-GMO cotton is maintained, e.g. in the case of toll ginning.	✓	
8.1.2	No irrigation from surface or groundwater sources is used for cotton cultivation.	✓	

Guidance for Implementation

Managing Entities are operating in countries where no GM cotton is currently authorised for commercial use. If countries move forward in adopting GMOs, Managing Entities must provide GMO-free seeds and insist that governments and distributors adopt and strictly observe biosafety regulations.

Managing Entities also need to ensure that non-GMO cotton cultivation can coexist with GMOs. Defined measures with the objective of avoiding the unintended presence of GMOs need to be put in place for cultivation, harvest, transport, storage, and ginning.

Since no irrigation from surface or groundwater sources is allowed, managing rainwater and soil moisture is essential. More implementation guidance on this aspect is presented under criterion 8.2.

Rainwater harvesting is permitted. To improve climate resilience, the establishment of water storage systems that collect and store rainwater can provide supplies during periods of scarcity. To further reduce the impact on water resources, these supplies should be primarily used for the preparation of natural liquid fertiliser or for (bio-)pesticide application.



CRITERION 8.2

→ The Managing Entity sustainably manages water resources and helps CmiA-contracted farmers adapt to changing rainfall patterns.

Intent

CmiA aims to integrate water stewardship into the processes of Managing Entities to the extent permitted by each Managing Entity's available capacities and sphere of influence.

Water stewardship is defined as using water in a way that is socially and culturally equitable, environmentally sustainable, and economically beneficial, achieved through a stakeholder-inclusive process that includes both site- and catchment-based actions. According to the Alliance for Water Stewardship¹, good water stewards understand their own water use, the catchment context, and how risks are shared in terms of water governance, water balance, water quality, and key water-related issues. They also engage in meaningful individual and collective actions that benefit people and nature.

Managing Entities can benefit from understanding water risks when developing climate change adaptation strategies. Since CmiA rules out irrigation, it is even more important to manage water effectively and efficiently in the context of growing water scarcity and changing or erratic rainfall patterns, both connected to climate change.

¹ More about the Alliance for Water Stewardship can be found here: <https://a4ws.org/>



It is important for Managing Entities to monitor and understand the water context of production areas. Mapping and understanding water availability and quality will help Managing Entities and associated farmers better manage water resources.

Measures to optimise and improve the use of water are vital for the sustainability of cotton farming. Relevant on-farm measures in this context aim at increasing the infiltration rates of rainwater and improving humidity retention in the soil, thereby managing soil moisture. In addition, the application of appropriate management practices ensures that water is not polluted. Water stewardship planning is therefore directly linked to the IPPM plan (by avoiding water pollution through pesticide application) and to soil management (by avoiding pollution through fertilisers).

Where possible, Managing Entities are encouraged to participate in collective action that promotes sustainable water use at the local or regional level. Areas suffering from water scarcity or high water pollution levels need attention and action from all water users in a given catchment area. Collective action will help Managing Entities and farmers avert or better manage water-related risks.

Managing Entities can play an important role in not only managing the water-related risks of cotton cultivation but also raising awareness amongst farmers and staff regarding water, sanitation, and hygiene (WASH). In addition to preventing water-borne illnesses like diarrhoea, WASH contributes to livelihoods, school attendance, and dignity, helping create resilient communities in healthy environments. Apart from conducting WASH training, Managing Entities can engage in projects that provide access to safe water or that improve school sanitation facilities in the communities of their associated farmers (cf. criterion 12.2).

INDICATORS

No.	Core	Field	Ginnery
8.2.1	The Managing Entity has adopted a time-bound water stewardship plan that addresses each of the following components: (1) Assessment of rainfall patterns and amounts (2) Effective soil-moisture management (3) Mapping and understanding of water resources (4) Water-quality management	✓	
8.2.2	The Managing Entity has established a timeline for implementing the components of the water stewardship plan. Responsibilities and operating procedures are defined and agreed upon by the executive management.	✓	
8.2.3	The Managing Entity regularly trains CmiA-contracted farmers to consider risks to water quality when managing and applying (<i>organic</i>) pesticides and nutrients (cf. criteria 9.8 and 8.3).	✓	
8.2.4	The percentage of CmiA-contracted farmers taking risks to water quality into account when managing and applying (<i>organic</i>) pesticides and nutrients.	✓	
No.	Improvement	Field	Ginnery
8.2.5	The Managing Entity has identified, mapped, and understood surface and underground water resources in the relevant catchment areas within the cotton-production areas cultivated by CmiA-contracted farmers (cf. indicator 7.2.1).	✓	
8.2.6	The Managing Entity regularly trains CmiA-contracted farmers in soil moisture-management practices with the intent of reducing water evaporation from the soil.	✓	
8.2.7	The percentage of CmiA-contracted farmers applying soil moisture-management practices.	✓	
8.2.8(a)	The Managing Entity regularly trains CmiA-contracted farmers in water, sanitation, and hygiene (WASH).	✓	
8.2.8(b)	The Managing Entity regularly trains its employees and workers in water, sanitation, and hygiene (WASH).		✓



Guidance for Implementation

Assessment of Rainfall Patterns and Amounts

Precipitation patterns—including volume as well as inter- and intra-annual variations and trends—are important for both short-term interventions (e.g. timely sowing) and long-term strategic decisions (e.g. adapting seed varieties or assessing the economic viability of cotton cultivation in certain areas).

- Data on precipitation, surface water flows, and the groundwater level can be collected by (lead) farmers
- Data may be available from local or national authorities (monitoring programmes, surveys, etc.)
- Data may be available online through tools like the World Resource Institute's Aqueduct Water Risk Atlas at: <https://www.wri.org/applications/aqueduct/water-risk-atlas>

Soil-Moisture Management

In rainfed regions, timely sowing is important in order to capture the maximum quantity of rainwater during the fruiting phase. Rainfall predictions need to be taken into consideration for all farm operations that are affected by rain.

Water conservation methods (like water harvesting, ridge planting, mulching, conservation tillage, cover crops, and draining excess water) are key to providing adequate soil moisture.

- Exploring the potential of rainwater harvesting during the rainy season in order to use the harvested water during the dry season decreases pressure on scarce surface and groundwater resources.
- Cotton is extremely sensitive to excess moisture, and water stagnation can reduce yields. Draining excess water is therefore crucial for a good crop. Ridges and furrows enable effective drainage and moisture management.
- Seeds should be sown when the topsoil (the upper ten centimetres) is wet and rains are predicted for the one to three weeks after sowing.

- Soil must be well drained because cotton plants are sensitive to root aeration. Cotton does not grow well in poorly drained soil, and when it rains excessively, water-logging in ill-drained soil causes damage to seedlings, which they rarely recover from properly.
- Cover crops and mulching help conserve soil moisture. A variety of cover crops can be used, but legume crops are preferred because they fix nitrogen, grow vigorously, and degrade rapidly to enrich the soil. Cover crops can either be grown prior to the cultivation of cotton or along with it. The cover crop is slashed 40 to 60 days after sowing, following which it is layered over the soil as mulch or incorporated into the soil for faster degradation, making its nutrients available to the cotton more quickly.

Water Quality Management

The management of water quality is directly linked to proper pesticide and fertiliser management. Ways to minimise the adverse effects of crop protection practices are covered in detail under principle 9 of this standard, and similar requirements for fertiliser management are described under criterion 8.3. In terms of water quality, the following measures are particularly noteworthy:

- CmiA cuts off the use of high-toxicity pesticides and encourages holistic IPPM approaches to reduce pesticide use to a minimum, preferably with low-toxicity substances (chemical or organic)
- Ensuring that pesticides are stored properly and that areas used for mixing and filling pesticides and for cleaning sprayers do not contaminate bodies of water
- Applying nutrients as needed, i.e. taking the requirements of the cotton crop as well as the nutrient state of the soil into account



CRITERION 8.3

→ The Managing Entity and CmiA-contracted farmers nurture soil health and apply techniques for soil conservation.

Intent

Soil supports microorganisms, plants, animals, and humans. It is composed of a symbiotic ecosystem that consists of organic matter, bacteria, fungi, insects, earthworms, and more. Soil also degrades harmful pollutants.

Farmers need to understand how agricultural practices can either complement and build or undermine and destroy the biological processes and ecosystem services on which their production systems are built. CmiA aims to maintain and improve soil fertility, to minimise and avoid soil erosion, and to increase humidity retention in soil. It is important to replenish soil with organic biomass and manure, especially to improve organic carbon content in the surface layers.

Given the very low fertiliser application rates across sub-Saharan Africa, CmiA does not generally limit the amount of fertiliser used. Instead, the focus is on reconciling the Managing Entity's policies on fertiliser utilisation with regional soil conditions, national scientific recommendations, and economic thresholds. This also includes training in the use of locally available, natural fertilisers such as compost or manure. Since shallow or highly weathered soils and ineffective or absent soil conservation techniques are major risk factors for net losses of nitrogen, techniques to maintain and improve soil structures contribute greatly to improved nitrogen fixation.

One of CmiA's priorities is to spread the practice of crop rotation with at least three crops, including one legume, to maintain or improve soil fertility and organic matter content. As this saves fertiliser and generally improves the small-scale farmers' capital basis (land), this practice is also essential from an economic point of view. Crop rotation also serves to break weed, pest, and disease cycles. Furthermore, it promotes crop diversification and increases food security.

INDICATORS

No.	Core	Field	Ginnery
8.3.1	The Managing Entity has a soil management plan that addresses each of the following components: (1) Identification of main soil types and conditions in the cotton-growing areas (2) Assessment of main measures for maintenance and enhancement of soil structure and fertility (3) Assessment of main measures for the continuous improvement of nutrient cycling (4) Identification of main training needs (5) Assessment of adoption rates of soil-fertility measures by CmiA-contracted farmers and, if necessary, analysis of main bottleneck obstructing adoption	✓	
8.3.2	The Managing Entity has established a timeline for implementing all components of the soil management plan.	✓	



No.	Core	Field	Ginnery
8.3.3	The Managing Entity regularly consults accessible soil maps and collects publicly available soil-testing data for the areas CmiA-contracted farmers are producing in (e.g. from government bodies or universities).	✓	
8.3.4	The Managing Entity regularly trains CmiA-contracted farmers to monitor soil fertility and nutrient status.	✓	
8.3.5	CmiA-contracted farmers receive regular training in techniques for soil conservation, such as: <ul style="list-style-type: none"> • Soil regeneration through crop diversity or crop rotation with leguminous crops • Prevention of erosion • The effective use of fertilisers • The monitoring of soil structure, soil fertility, and nutrient status • Tillage methods for reducing negative effects on soil structure/compaction • The use of cover crops / intercropping • The use of organic matter / animal manure • The application of residue management / mulching 	✓	
8.3.6	The percentage of CmiA-contracted farmers using crop rotation (i.e. the practice of alternating the crops grown in a specific field in a regular sequence). Cotton is not grown in the same field several years in a row.	✓	
8.3.7	The percentage of CmiA-contracted farmers who include a leguminous crop in their crop rotation or who let the field in question lie fallow for one year.	✓	
8.3.8	The percentage of CmiA-contracted farmers who control soil erosion, including through special mitigation measures on slopes.	✓	
No.	Improvement	Field	Ginnery
8.3.9	The Managing Entity validates publicly available data through its own soil health analysis.	✓	
8.3.10	The Managing Entity offers soil testing kits, at minimum with NPK and pH tests, to interested CmiA-contracted farmers at a fair price.	✓	
8.3.11	Percentage of CmiA-contracted farmers who apply more soil conservation techniques (in addition to those mentioned in indicators 8.3.8, 8.3.9, and 8.3.10) and were trained by the Managing Entity. Such techniques include: <ul style="list-style-type: none"> • The correct and effective use of fertilisers (taking into consideration intervals of application, release properties, risks to water quality, and the prescribed dosage, period, and timing) • The monitoring of soil structure, soil fertility, and nutrient status • Tillage methods to reduce negative effects on soil structure/compaction (such as zero tillage, conservation tillage, or minimum tillage) • The use of cover crops / intercropping • The use of organic matter / animal manure • The application of residue management / mulching 	✓	



Guidance for Implementation

Methods of soil conservation include but are not limited to:

- Preventing erosion through physical barriers like stone walls and terraces or through the application of contour ploughing to slow the speed at which water flows on slopes
- Using cover crops to prevent soil erosion by covering the soil with living vegetation and roots that hold the soil together; this also maintains organic matter in the soil, increases nitrogen availability, and retains excess nutrients
- Producing compost and/or organic fertiliser (e.g. manure, cow urine, or compost tea) to increase soil quality and to improve soil structure
- Minimising soil disturbance/tillage, e.g. by ripping instead of ploughing

There should be no clearing of land by burning because this method releases emissions, including of methane. Instead, cut biomass should be left in the fields or gathered for compost pits/heaps.

Crop rotation should comprise a minimum of three crops, including either one leguminous (i.e. nitrogen-fixing) crop or one year of fallow farming. The cycle of soil depletion can be halted, or at least slowed down, by integrating leguminous crops in the cultivation sequence. Examples of leguminous crops that work as nitrogen-fixing plants are soy, mung beans, all sorts of beans and green grams, and *Faidherbia alibia*.

Managing Entities are expected to:

- Know the soil conditions for cotton cultivation in their different regions of operation. This includes any necessary soil analysis or soil testing
- Know and take into consideration the scientific recommendations from national research institutes regarding fertiliser application and recommended dosages. If fertilisers are given out on credit, the amounts of fertiliser given out should also be subject to economic considerations, e.g. minimising excessive debt risk to farmers
- Train farmers in the best use of fertilisers, if fertilisers are given out on credit
- Train farmers in the use of locally available natural fertilisers, such as cow urine, manure, or compost





PRINCIPLE 9:

CmiA Managing Entities minimise the adverse effects of crop-protection practices.

Introduction to the Principle

CmiA strives to keep the use of pesticides as a last resort and to minimise risks to human health and the environment. Principle 9 further defines the complete set of CmiA strategies to continuously reduce the use of highly hazardous pesticides and to fully integrate production and pest management.

Wherever pesticides are applied, CmiA intends to ensure that farmers, their families, and communities are protected from pesticide exposure during storage, handling, application, and disposal. It is equally important to protect the environment, especially avoiding adverse effects for bodies of water.

Cotton is subject to attacks from a wide range of pests as well as diseases and weed infestations. Although a wide range of methods are available to manage and control them, chemical treatments are often the most commonly used pest management tool despite the many hazards associated with their use, especially in connection with poverty and a hot climate. One of CmiA's main objectives is to continuously reduce cotton's toxic load, i.e. to maximise the effectiveness of pesticides while protecting human and animal health and the environment from their harmful effects. The promotion and implementation of integrated production and pest management (IPPM) broadens the scope of crop protection methods available to small-scale farmers.

To minimise risks to people and the environment, the CmiA standard combines different requirements:

- Exclusion of highly hazardous pesticides
- Exclusive use of approved pesticides that are registered for cotton cultivation and that are correctly labelled in the national language(s)
- Adoption of integrated production and pest management (IPPM), including and emphasising pest control techniques other than pesticide application, thereby leading to a reduction in the quantity of pesticide used
- Occupational health and safety criteria regarding the application and handling of pesticides, thereby promoting practices that minimise the harmful effects of pesticides on both the users and the environment





CRITERION 9.1

→ The Managing Entity adopts an integrated production and pest management (IPPM) plan.

Intent

Integrated production and pest management (IPPM) is an ecological, fundamental guiding approach to how farmers should protect their cotton crop from the pests it attracts. As such, the aim of IPPM is to grow a healthy crop with the least possible disruption to agro-ecosystems and to reduce the need for chemicals. To achieve this, IPPM uses a variety of complementary strategies, including mechanical and physical devices as well as genetic, biological, cultural, and chemical management. These methods are implemented in three stages: prevention, observation, and intervention.

According to the FAO definition, integrated production and pest management means:

- a. growing a healthy crop;
- b. preventing the build-up of pest populations;
- c. preserving and enhancing populations of beneficial insects;
- d. making regular field observations of the crop's health and of key pest and beneficial insects; and
- e. managing pesticide resistance.

Regarding pest control, the IPPM approach builds on several strategies, with synthetic broad-spectrum pesticides being the last resort.

The following steps can be considered typical for the IPPM approach on the FAO escalation ladder:

Prevention and/or suppression of harmful organisms:

This is often best achieved by a combination of the following options:

- Crop rotation, inter-cropping
- Suitable cultivation techniques, e.g. seed sanitation, sowing times and densities, under-sowing, conservation tillage, or direct sowing
- Using pest-resistant varieties and standard/certified seed material, as applicable
- Balancing soil fertility and water management to make optimum use of organic matter
- Preventing the spread of harmful organisms through field sanitation and hygiene measures, e.g. by removing affected plants or plant parts
- Protecting and enhancing important beneficial organisms, e.g. by utilising ecological infrastructure inside and outside production sites

Harmful organisms must be monitored with suitable methods and tools, where available. Such suitable tools should include observations in the field and, where feasible, warnings, forecasting, and early diagnosis systems like traps.

Based on the results of the monitoring, it is decided whether and when to use which pest management inputs. Sustainable biological, physical, and other non-chemical methods must be given priority over chemical methods if they provide satisfactory pest control.

Pesticides should only be applied as a last resort when there are no adequate non-chemical alternatives and the use of pesticides is economically justified.

The pesticides applied shall be as specific as possible to the target and shall have the least side effects on human health, non-target organisms, and the environment, and their use should be kept at minimum levels, e.g. through partial applications.

Monitor the success of the applied pest management measures.

This makes it clear that integrated production and pest management (IPPM) is closely related to best practices for soil and water conservation and to good agricultural practices (GAP). For example, crop rotation in combination with suitable cultivation techniques will contribute greatly to suppressing harmful organisms in the field.



INDICATORS

No.	Core	Field	Ginnery
9.1.1	The Managing Entity has established a locally adapted and time-bound integrated production and pest management (IPPM) plan that identifies the appropriate specific practices for implementing the five IPPM components: (1) Growing healthy crops (2) Preventing the build-up of pest populations and the spread of disease (3) Preserving and enhancing populations of beneficial insects (4) Conducting regular field observations of crop health and of key pest and beneficial insects (5) Managing resistance	✓	
9.1.2	The Managing Entity implements its IPPM plan in accordance with the established timeline. Responsibilities and operating procedures are defined and agreed upon by senior management.	✓	
9.1.3	The Managing Entity trains CmiA-contracted farmers in threshold spraying and in scouting for key pest and beneficiary insects.	✓	
9.1.4	The Managing Entity actively discourages CmiA-contracted farmers from calendar or random spraying.	✓	
No.	Improvement	Field	Ginnery
9.1.5	The percentage of CmiA-contracted farmers adopting the five components of integrated production and pest management in accordance with the list of practices defined in the locally adapted and time-bound plan.	✓	
9.1.6	CmiA-contracted farmers are trained in the handling and application of non-chemical methods of pest control.	✓	
9.1.7	A timeline is in place for the complete implementation of the five IPPM components.	✓	
9.1.8	The Managing Entity regularly changes active ingredients used for pest control to avoid building up resistance. In the event that other bodies are responsible for pesticide procurement and distribution, the Managing Entity advocates for regular changes of active ingredients.	✓	

Guidance for Implementation

The principle of scouting and threshold spraying (i.e. the use of pesticides only when deemed necessary based on field observations) is an integral part of IPPM. Farmers should have the capacity—individually, within their farmers' group, or through the support of experts—to make their pest management decisions based on a minimum level of field observations and analysis and on concepts such as economic thresholds for pests or predator-to-pest ratios. All decisions to spray chemical pesticides should be effectively based on field observation and be in accordance with the Managing Entity's IPPM plan or programme.

Availability of training material and knowledge of best practices used for scouting and counting pests (to decide when to spray) can give an excellent indication of how well this method is being implemented and accepted.

CmiA-contracted farmers should be able to demonstrate and explain the practices of threshold spraying, including the functioning of pegboards (used in eastern and southern Africa) or ardoises/planchettes (used in western and central Africa) and the respective threshold levels of identified pests that need to be observed in order to trigger a spraying decision.



In exceptional cases, official recommendations from credible research bodies that build on reliable, recent, and locally relevant research may call on farmers to spray pesticides on a specific date relative to the crop cycle. This may happen in response to risks of pest or disease infections, which can be difficult to address in a timely manner after scouting and threshold assessment, and in the absence of any other effective prevention methods. Managing Entities should also be able to demonstrate that alternative control methods are being investigated, either by the research body putting out the recommendation or by themselves.

The use of additional non-chemical methods of pest control can further reduce the need for chemical pesticides. If effective non-chemical methods are applied, it is expected that costs for pest control can be significantly reduced without endangering yields.

Possible non-chemical methods of pest control include but are not limited to:

- bio-pesticides like soap, animal urine, or botanicals;
- molasses traps; and
- support for beneficial insects, e.g. by breeding them or dispensing food spray.



CRITERION 9.2

→ The Managing Entity only uses pesticides that are:

- (1) nationally registered and approved for use in cotton cultivation; and
- (2) labelled according to national standards in at least one of the national languages or an applicable official regional language.

Intent

Registration and approval by national pesticide regulation authorities indicate that the relevant regulatory authority has assessed the specific risks associated with the use of each particular type of pesticide on the crop it is registered for. The registration also shows that appropriate precautions and directions for use have been developed and approved.

Labels on pesticide containers as well as material safety data sheets (MSDS), which have to be provided for each legally registered pesticide product, contain important information regarding the properties of the product being used, directions for use, and precautions and measures that must be adopted when using it, all of which need to be followed by the Managing Entity and CmiA-contracted farmers.

INDICATORS

No.	Core	Field	Ginnery
9.2.1	All pesticides used are registered nationally and approved for use in cotton cultivation.	✓	
9.2.2	All pesticides used are correctly labelled in accordance with national standards in at least one de facto or de jure official national or applicable regional language.	✓	



Guidance for Implementation

The label should contain information on the appropriate rate and volume of water to be used; any restrictions on use; first aid information; the crop(s) the product is registered for; product compatibility; and container disposal requirements. Especially the application rate of a pesticide (i.e. the volume per unit area) and any

withholding period (i.e. the minimum period that must elapse between the last pesticide application and harvesting) must be observed.

Additional stakeholders to be consulted include any relevant pesticide regulatory authorities.



CRITERION 9.3

→ Highly hazardous pesticides are excluded from use in CmiA cotton cultivation.

Substances falling under the following categories are banned under CmiA:

- Stockholm Convention, Annexes A and B
- Rotterdam Convention, Annex III
- Montreal Protocol, Annexes
- Active ingredients categorised as WHO Class Ia (extremely hazardous) or Class Ib (highly hazardous), respectively listed in categories 1 and 2 of GHS

Intent

The conventions, protocols, and classifications listed above cover substances that pose an unacceptable hazard to human health and the environment and that must therefore be eliminated from use in agriculture.

The **Stockholm Convention** lists persistent organic pollutants (POPs) that remain intact in the environment for long periods, become widely distributed geographically, accumulate in the fatty tissues of humans and wildlife, and have harmful impacts on human health or on the environment.

The **Rotterdam Convention** covers pesticides that have been banned or severely restricted for health and environmental reasons.

The **Montreal Protocol** was designed to reduce the production and consumption of ozone-depleting substances in order to reduce their abundance in the atmosphere and thereby protect the Earth's fragile ozone layer.

The **WHO Recommended Classification of Pesticides by Hazard** is a classification system for distinguishing between the more- and less-hazardous forms of selected pesticides based on acute risk to human health, with classes 1a and 1b being defined as "extremely hazardous" and "highly hazardous".



The United Nations' **Globally Harmonised System of Classification and Labelling of Chemicals (GHS)** provides a harmonised basis for globally uniform physical, environmental, and health and safety information on hazardous chemical substances and mixtures. GHS uses hazard class (e.g. flammability, acute toxicity, skin corrosion/irritation, serious eye damage/irritation, skin/dermal sensitisation, or acute and chronic aquatic hazards) and hazard category to describe the nature and severity of chemical hazards. Category 1 represents the most severe hazard.

At Cotton made in Africa, the use of the listed substances and chemicals is banned, as we believe that cotton production is possible without them. Managing Entities and CmiA-contracted farmers must not use substances that fall within the parameters of these conventions and protocols or are listed in the respective annexes or under the categories of the aforementioned WHO and GHS classifications.

INDICATORS

No.	Core	Field	Ginnery
9.3.1	<p>The Managing Entity only purchases, distributes, and uses pesticides that are not banned from use for the cultivation of CmiA cotton.</p> <p>Substances falling under the following categories are banned under CmiA:</p> <ul style="list-style-type: none"> • Stockholm Convention, Annexes A and B • Rotterdam Convention, Annex III • Montreal Protocol, Annexes • Active ingredients categorised as WHO Class Ia (extremely hazardous) or Class Ib (highly hazardous), respectively listed in categories 1 and 2 of GHS <p><i>For organic production, the regulations relevant for the obtained organic certificate apply.</i></p>	✓	
9.3.2	<p>An up-to-date and complete list of (<i>organic</i>) pesticides distributed to CmiA-contracted farmers is available. The list of (<i>organic</i>) pesticides includes:</p> <ul style="list-style-type: none"> • brand names, active ingredients, and their concentrations; and • the specific protective equipment and training needed to apply the products. 	✓	

Guidance for Implementation

For the easier identification of active ingredients, CmiA provides a list of prohibited pesticide active ingredients under the CmiA verification system. In case of discrepancy between the CmiA list and the referenced conventions, protocols, and WHO/GHS lists, the latter will prevail.

Managing Entities should regularly check both CmiA's Prohibited Pesticide Active Ingredients List and national registration lists, at the latest before placing purchase orders for pesticides, in order to avoid non-compliance with this criterion.



CRITERION 9.4

→ By 2024, the Managing Entity must phase out the use of pesticides with active ingredients that are defined as carcinogenic, mutagenic, or reprotoxic (CMR) substances according to categories 1A and 1B of GHS.

Intent

CmiA aims to reduce the overall toxicity of pesticides applied to cotton. To this end, CmiA requirements include pesticide risk reduction, with a longer-term goal of progressively banning highly hazardous pesticides (HHPs).

The FAO and WHO Code of Conduct on Pesticide Management defines highly hazardous pesticides as pesticides that are acknowledged to present particularly high levels of acute or chronic hazard to health or the environment according to internationally accepted classification systems such as WHO or GHS or their listing in relevant binding international agreements or conventions. In addition, pesticides that appear to cause severe or irreversible harm to health or the environment under conditions of use in a given country may be considered to be and treated as highly hazardous.

Chronic human toxicity refers to properties that may cause any adverse effect as a result of repeated or long-term exposure. Such adverse effects could include cancer or developmental disorders, for instance.

With its requirement to phase out active ingredients that are classified as carcinogenic, mutagenic, or reprotoxic (CMR) substances, CmiA takes the next step in further reducing pesticide application risks for small-scale cotton farmers. Future standard revisions are likely to expand the hazard categories to include environmental aspects beyond those already covered under the international conventions mentioned in criterion 9.3.

INDICATORS

No.	Core	Field	Ginnery
9.4.1	The Managing Entity has a plan to phase out by 2024 pesticides with active ingredients defined as carcinogenic, mutagenic, or reprotoxic (CMR) substances listed in categories 1A and 1B of the Globally Harmonised System of Classification and Labelling of Chemicals (GHS).	✓	

Guidance for Implementation

Phase-out deadlines for CMR substances are set and CmiA provides a list of pesticide active ingredients that are prohibited under the CmiA verification system. In case of discrepancy between the CmiA list and the referenced conventions, protocols, and WHO/GHS lists, the latter will prevail.

Managing Entities should regularly check both the Prohibited Pesticide Active Ingredients List and national registration lists, at the latest before placing purchase orders for pesticides, in order to avoid non-compliance with this criterion.



CRITERION 9.5

→ The Managing Entity ensures that pesticides are only prepared and applied by persons who are:

- (a) healthy;
- (b) skilled and trained in the application of pesticides;
- (c) 18 years of age or older; and
- (d) not pregnant or nursing.

Intent

Considering the hazards presented by pesticides, it is obviously important that people who prepare or apply them are both healthy and well-trained. Someone in poor physical condition is more likely to have an accident, and people with a chronic illness (e.g. of the lungs, liver, kidney, or the immune system) might be at a greater risk of health damage. In addition, anyone with an acute dermal injury is at a higher risk of active ingredients entering the body through the damaged skin.

Pesticide application is, by nature, likely to harm children's health and is therefore deemed to constitute hazardous child labour (ILO Convention 182). In consequence, as defined in criterion 6.1, children should not apply pesticides. Reasons for restricting the handling and application of pesticides to people aged 18 and older include the physical aspect of application as well as the increased risk of fatigue, injury, and poisoning for young people whose bodies are still developing.

Pregnant and nursing women should not be involved in pesticide application due to the risk associated with exposing their developing foetus or nursing child to pesticides. Given that unborn and young children are especially sensitive to pesticides and that women may not be aware of their pregnancy in its early stages, the ideal situation would be for women of child-bearing age not to apply pesticides at all.

INDICATORS

No.	Core	Field	Ginnery
9.5.1	The Managing Entity regularly trains CmiA-contracted farmers on the health risks associated with the exposure to (<i>organic</i>) pesticides. Special attention is given to the groups of people who must not be involved in the preparation or application of (<i>organic</i>) pesticides (i.e. people who are pregnant, nursing, under 18 years of age, not healthy, or not skilled and trained in application).	✓	
9.5.2	Field evidence shows that persons preparing and applying (<i>organic</i>) pesticides are: <ul style="list-style-type: none"> (a) 18 years of age or older; (b) healthy; (c) skilled and trained in pesticide application; and (d) not pregnant or nursing. 	✓	

Guidance for Implementation

In countries with many female- or children-headed households, e.g. due to high HIV prevalence rates, Managing Entities can play an important role by working with farmers' groups to find and train service providers to

help find alternatives for children, teenagers, and women spraying pesticides. One solution would be for a farmers' group to hire a dedicated treatment team to apply the pesticide.



CRITERION 9.6

→ The Managing Entity ensures that any person who prepares and applies pesticides correctly uses appropriate personal protective equipment (PPE).

Intent

Whenever pesticides are prepared or applied, the use of appropriate personal protective equipment is essential for minimising health risks for the people handling or applying pesticides.

Pesticides can enter a person's body through various ways, including orally, dermally, or by inhalation. Risk factors include the handling of a pesticide and its form, e.g. liquid or dust. Dermal exposure is the most common and can occur during the handling, mixing, or loading of pesticides as well as during application, for example as a result of a leaking backpack applicator. Even though hands and forearms are more exposed, other parts of the body (e.g. eyes, abdomen, or groin) absorb pesticides more quickly. The eyes and skin can also be badly damaged by the corrosive effects of many pesticides. The greatest risk occurs when handling concentrated pesticides, i.e. when mixing.

Inhaling a pesticide is less common but still a potential hazard. It is therefore important to take weather conditions, especially the wind, into account (cf. criterion 9.7).

Although ingestion is the least frequent form of exposure, it can occur when users eat, smoke, or drink near pesticides or forget to wash their hands after handling pesticides. In addition, accidents can happen, with people mistakenly consuming a pesticide stored in a food or drink container or (mis-)using a pesticide container for household purposes (cf. criterion 9.10).

Exposure can be reduced significantly through good work practices, including by wearing appropriate personal protective equipment (PPE). At minimum, gloves, long-sleeved shirts, long trousers, rubber boots, and splash-proof goggles should be worn when mixing and applying pesticides.

INDICATORS

No.	Core	Field	Ginnery
9.6.1	The Managing Entity regularly (at least annually) checks (<i>organic</i>) pesticide labels and ensures that farmers have access to adequate PPE recommended for the distributed pesticides.	✓	
9.6.2	The Managing Entity regularly trains CmiA-contracted farmers in the use of minimum protective clothing. Protective clothing for the occupational health and safety of farmers' needs to be adequate relative to the applied (<i>organic</i>) pesticide and to the application device used (as prescribed in the material safety data sheet or on the pesticide label).	✓	
9.6.3	Field evidence shows that CmiA-contracted farmers wear minimum personal protective equipment while preparing and applying (<i>organic</i>) pesticides. The person preparing or applying (<i>organic</i>) pesticides needs to be protected from inhalation, ingestion, and eye or skin contact. Protective clothing for the occupational health and safety of farmers' needs to be adequate relative to the applied (<i>organic</i>) pesticide and the application device used (as prescribed in the material safety data sheet or on the pesticide label). In all cases, minimum PPE includes a shirt with long sleeves, long trousers, closed shoes, and a mask where applicable.	✓	



Guidance for Implementation

Labels and material safety data sheets (MSDS) of pesticides contain information about the appropriate protective equipment (PPE) to be used, based on the risks posed by the pesticide. Where PPE is used to control risks associated with pesticides, it is essential that certain conditions be met for it to be effective. PPE should correctly fit each wearer, and users need to understand how and why to use it. All PPE should be functional and correctly maintained and cleaned.

Depending on the risk posed by the pesticides, minimum PPE can include overalls or a shirt with long sleeves and trousers along with rubber boots or closed shoes. In addition, masks, gloves, and safety goggles can be required when mixing pesticides. In case of doubt, always check the MSDS or label for PPE requirements.

In cases where appropriate personal protective equipment is not available to the farmers, the Managing Entity may support farmers, for example by providing PPE on a credit basis or by promoting the use of at least minimum PPE and providing usage instructions (e.g. on proper washing and storage procedures).



CRITERION 9.7

→ The Managing Entity ensures that CmiA-contracted farmers apply pesticides in appropriate weather conditions, according to the label and/or the manufacturer's instructions, and with appropriate and well-maintained equipment.

Intent

For each pesticide and each crop, pesticide producers formulate a recommended dosage to ensure the safe use of pesticides. Listed on the corresponding MSDS, these application procedures must be followed closely, as too-high dosages may cause damage to the crop and lead to unacceptable residue levels and too-low dosages may be ineffective and lead to the development of pesticide resistance.

Some weather conditions can negate the effect of certain pesticides, making it important to consider both current weather conditions and the forecast before application.

- Wind is one of the most common contributors to pesticide droplet drift, which can harm both the person applying the pesticide (who might inhale the pesticide dust or spray droplets) and the environment (when carried by the wind into sensitive areas).
- Strong sunshine and heat can cause the pesticide to evaporate from the leaves before it has taken effect.
- On the other hand, wet conditions do not allow the pesticide to stick to the leaves, and heavy rain within a few hours of spraying can wash the pesticide off of the leaves before it has sufficiently affected the targeted pest (e.g. insect or weed).

Understanding proper equipment maintenance and safety is vital to preventing chemical spills, over-application, or pesticide drift.



INDICATORS

No.	Core	Field	Ginnery
9.7.1	The Managing Entity regularly trains CmiA-contracted farmers in: (a) the proper preparation of spray formulations for effective use; (b) safe spraying techniques; (c) maintaining appropriate equipment for (<i>organic</i>) pesticide application; and (d) considering weather conditions when scheduling spraying.	✓	
No.	Improvement	Field	Ginnery
9.7.2	The percentage of CmiA-contracted farmers applying (<i>organic</i>) pesticides in appropriate weather conditions.	✓	
9.7.3	The percentage of CmiA-contracted farmers applying (<i>organic</i>) pesticides with appropriate and well-maintained equipment.	✓	
9.7.4	The Managing Entity offers a service for CmiA-contracted farmers to maintain their (<i>organic</i>) pesticide-application equipment.	✓	

Guidance for Implementation

Pesticide safety training for farmers must include not only the proper preparation of spraying formulations, as indicated on the MSDS, but also cover the importance of considering weather conditions when scheduling spraying. This means frequently monitoring the wind speed and direction, taking appropriate steps to manage drift, and stopping the application if wind conditions become unfavourable. Scheduling can also be affected by the evaporation of pesticides at high heat (often around mid-day) and the fact that many insects are most active early in the morning and around dusk, making the early

morning and early evening the most effective times for applying insecticides. Application should be avoided when rainfall is imminent since the application will not be effective and risks for off-site contamination rise significantly.

Farmers also need to be aware of the importance of cleaning equipment directly after application in order to keep it in mint condition and must know how to examine their spraying equipment for leaks, worn hoses or nozzles, and similar maintenance issues.



CRITERION 9.8

→ The Managing Entity ensures that CmiA-contracted farmers apply pesticides without contaminating bodies of water.

Intent

Run-off and/or leaching can occur when pesticides are carried off the application site into groundwater or bodies of water such as rivers, lakes, streams, or wells. It can occur when too much pesticide is applied or is spilled on the ground, too much rain falls in a short period of time, or highly water-soluble pesticides are used. In fact, several factors determine whether a pesticide will reach groundwater, including its chemical properties, the soil type, site conditions, the depth to groundwater, pesticide management practices, and more.

Managing Entities must be aware of the potential risks of pesticide leaching and run-off into groundwater or bodies of water and can adapt pesticide management through the choice and promotion of sprayer types that do not use large amounts of water for one single spray mix. Risks to water and the environment can be significantly reduced by properly timing application, handling sprayers, assessing site susceptibility, and respecting and protecting bodies of water, e.g. through buffer zones.

INDICATORS

No.	Core	Field	Ginnery
9.8.1	The Managing Entity regularly trains CmiA-contracted farmers in: (a) preventing water contamination when using (<i>organic</i>) pesticides; and (b) maintaining buffer zones around seasonal and permanent bodies of water.	✓	
9.8.2	The percentage of CmiA-contracted farmers who apply (<i>organic</i>) pesticides in a way that minimises the risk of negatively influencing water quality (cf. criterion 8.2).	✓	

Guidance for Implementation

The following measures can minimise run-off and leaching:

- Using vegetative buffers to help prevent any pesticides from moving off-site
- Applying pesticides specifically to the target site while avoiding wells and surface water like ponds and streams
- Following the storage, use, and disposal directions on the pesticide label

- Avoiding pesticide spills and preventing the back-siphoning of pesticide-contaminated water into the water source
- Properly disposing of any leftover pesticides, tank mixes, and rinse water in accordance with label instructions
- Storing pesticides safely, in the original labelled container, and in a location away from water sources



CRITERION 9.9

→ The Managing Entity stores pesticides safely.

Intent

Because Managing Entities provide CmiA-contracted farmers with agricultural inputs (cf. principle 10), they usually purchase pesticides in bulk and therefore store pesticides on their own premises. Poorly stored pesticides or improper loading practices can present a potential risk to the health of the Managing Entity's employees or to the integrity of the environment. The quality of surface water, groundwater, and soil can be degraded in areas where pesticides are stored under inappropriate conditions. Accidents involving spills or leaks may have serious health and environmental consequences.

Managing Entities need to manage their storage areas in ways that will help minimise exposure to pesticides, reduce the risks to staff and to public health and the environment, and prevent unauthorised access to hazardous chemicals. Proper pesticide and inventory practices will prolong the shelf-life of pesticides and make it easier to track pesticide usage so that the Managing Entity can plan purchases for future years. The MSDS provide information on storage requirements as well as additional information such as fire control recommendations. Finally, reducing the amount of pesticides to be stored lowers the risk of chemical fires, explosions, or spills that contaminate the soil or bodies of water.

Note: In some countries, Managing Entities are not allowed to purchase agricultural inputs directly because purchases must be made through central bodies, often public authorities. In such cases, this criterion is not applicable.

INDICATORS

No.	Core	Field	Ginnery
9.9.1	Dedicated (<i>organic</i>) pesticide storage areas of the Managing Entity must fully comply with relevant legislation.	✓	
No.	Improvement	Field	Ginnery
9.9.2	Central (<i>organic</i>) pesticides storage facilities have: a sound roof and impermeable floors; shelves with non-absorbent and fire-resistant material; a system to retain spillage; clear, permanent warning signs close to access doors; visible safety warnings, explanations of pictograms, symptoms of intoxication, and first-aid information for each product stored; a visible emergency procedure; and an eye-washing area.	✓	
9.9.3	All facilities belonging to the Managing Entity and used for storing (<i>organic</i>) pesticides must be dry and clean, well ventilated, sufficiently lit, structurally secure, and equipped with non-absorbent material.	✓	



Guidance for Implementation

Managing Entities can use the following points for guidance on the safe storage of pesticides:

- Pesticides should not be stored outdoors.
- Storage sites should not be located in areas prone to flooding.
- Pesticide storage areas should be located away from direct sunlight and extreme heat.
- To avoid contamination, pesticides should be stored away from fertiliser, food, feed, potable water supplies, seeds, and personal protective equipment.
- Pesticides should be stored in accordance with their label requirements, in their original container, and with the label clearly visible.
- Separation of pesticides by hazard and function is essential. Flammable pesticides should be stored separately from non-flammable pesticides, for example in a fire-proof cabinet.



CRITERION 9.10

→ The Managing Entity ensures that CmiA-contracted farmers store, handle, clean, and transport pesticide-application equipment and containers safely in order to minimise risks of environmental harm and human exposure.

Intent

In line with the FAO Code of Conduct on Pesticide Management, CmiA aims to promote practices that reduce risks throughout the lifecycle of pesticides, with the objective of minimising adverse effects on humans, animals, and the environment and preventing accidental poisoning resulting from handling, storage, transport, use, or disposal and from the presence of pesticide residues in food and feed.

During transport and storage, pesticides should not pass through the hands of untrained or non-protected people. It is therefore essential to take all necessary precautions to prevent, for example, children from being able to access toxic products.

INDICATORS

No.	Core	Field	Ginnery
9.10.1	The Managing Entity regularly trains CmiA-contracted farmers in: (a) the safe storage of (<i>organic</i>) pesticides; (b) safe handling; (c) safe transport; and (d) the cleaning of equipment and containers.	✓	
No.	Improvement	Field	Ginnery
9.10.2	The percentage of farms with separate and safe (<i>organic</i>) pesticide storage facilities and cleaning sites.	✓	



Guidance for Implementation

- Pesticides should be kept out of the reach of children, unauthorised persons, and animals and stored in a locked, well-ventilated room out of the sunlight.
- Due to the risk of contamination, pesticides should not be kept in the kitchen, under beds in bedrooms, or in any storage area where food, animal feed, human medicine, veterinary supplies, seeds, fertiliser, or other stored products are kept.
- To prevent accidents, pesticides should be kept in their original containers and should never be stored in food or drink containers.

- Powdered formulations should be stored separately from—and preferably above—liquid ones.
- Ideally, pesticides should only be purchased in the amount required for immediate use and be used as soon as they are purchased in order to minimise the need for storage.

Although it is not their direct responsibility, Managing Entities can play an important role in making sure that sufficient storage facilities exist in the villages, e.g. by coordinating with farmers' groups and by providing guidance on how to establish adequate storage facilities.



CRITERION 9.11

→ The Managing Entity ensures that CmiA-contracted farmers dispose of empty pesticide containers safely.

Intent

Unless empty pesticide containers are managed correctly, they are hazardous to both humans and the environment. Thus, the intent of this criterion is to prevent the re-use of containers for any other purpose. Intentional or unintentional use can lead to accidental poisoning if the container in question is contaminated, and containers abandoned in the environment can result in pesticides polluting the soil and groundwater.

The FAO Code of Conduct recommends establishing container management schemes, which should ensure that:

- the containers are decontaminated directly following the use of their contents;
- the inappropriate use of the empty containers is prevented; and
- farmers can easily return their empty containers through the scheme.

Unfortunately, the last option is not available to most African farmers, as waste treatment cycles are not well established. In some regions, empty containers also have a value for the storage of water and food or for recycling into cookware and tools. Without adequate control, the risk is that pesticide containers will be used for the mentioned purposes. Pesticide containers, however well cleaned, are not appropriate for the storage of water and foodstuffs. CmiA's immediate priority is to ensure that children and (farm) animals are prevented from accessing empty pesticide containers and that there is no danger of people re-using empty pesticide containers.



INDICATORS

No.	Core	Field	Ginnery
9.11.1	The Managing Entity regularly trains CmiA-contracted farmers regarding the dangers of re-using empty (<i>organic</i>) pesticide containers and how to dispose of them in a safe manner.	✓	
No.	Improvement	Field	Ginnery
9.11.2	The percentage of CmiA-contracted farmers who dispose of empty (<i>organic</i>) pesticide containers safely.	✓	
9.11.3	The Managing Entity has a collection, return, and/or disposal system (organised by the Managing Entity, the government, a supplier, or a designated service provider) for empty (<i>organic</i>) pesticide containers.	✓	

Guidance for Implementation

Managing Entities need to train farmers to ensure the safe disposal of empty pesticide containers. This should include instructions to immediately clean the container of its contents following their use and then physically damage it to render it unusable.

- Instructions for cleaning containers should be included in the product label and product safety data sheets. In this context, the most common and widely applicable cleaning method is to triple-rinse the empty container, with the rinsate added to the spray tank or disposed of safely.
- Puncturing or cutting are appropriate means of preventing containers from being re-used.

In the absence of container management schemes that include an easy return option for farmers, they will have to dispose of pesticide containers at the place of use. Unfortunately, all options come with downsides.

While burning was listed as a disposal option in the past, it has been found that burning plastics and pesticides

in an uncontrolled fire will not completely destroy the hazardous components and may generate environmentally persistent toxic emissions. Empty containers should not be burnt at farms.

Burying rinsed pesticide containers at the place of use is not an ideal solution either. To avoid leakage, empty pesticide containers should never be disposed of close to bodies of water. Plastic containers are highly stable and do not biodegrade, meaning that they will remain intact indefinitely if buried. Burying containers is not easy because the hollow space inside them and their low density will cause them to gradually rise to the surface of the soil. As such, burying at the place of use is not a viable solution. Disposal in a pit latrine seems the best of these bad options.

CmiA strives to work towards the implementation of comprehensive container management systems and encourages Managing Entities to implement return systems, e.g. requiring farmers to return empty bottles to the Managing Entity before a new container/bottle is given out.



PILLAR 4: Prosperity

Introduction to the Prosperity Pillar

→ The main objective of the Aid by Trade Foundation is to improve the living conditions of small-scale cotton farmers in Africa and, in line with the United Nations Agenda for Sustainable Development, to ensure that they can enjoy prosperous and fulfilling lives. Economic principles are therefore as important to the CmiA standard as are social and environmental ones.

Although Sub-Saharan Africa is among the biggest cotton exporters worldwide, African small-scale farmers have so far not fully been able to use this potential to improve their living conditions. There are still systemic inequities that limit prosperity, and farmers face challenges including low productivity, poor infrastructure, and fluctuating world market prices.

Improving the productivity of small-scale farmers key to combatting poverty. Higher productivity generates more income and reduces poverty for farmers and non-farmers. Increased purchasing power promotes the diversification of local economies and creates jobs in commerce, small business, and the trades.

The challenge of providing millions of small-scale farmers

with advisory services, high-quality seeds, and other agricultural inputs while organising their market access is immense. One way to tackle this challenge is to create a link between small-scale farmers and the market through contracts with agro-industrial buyers. This system, which is known as contract farming, is well established for a number of products in several Sub-Saharan African countries and is often the only opportunity for small-scale farmers to access advisory services and external inputs for agricultural production. Since its inception, CmiA has chosen to use these established contract farming systems in order to achieve a broad impact.

CmiA's commitment is not based on donations but rather on the principle of activating trade and market forces. With regard to cotton production, this translates to a focus on the creation and maintenance of long-term, fair, and trustworthy trade relations between farmers and ginners.¹ CmiA therefore identifies and partners with like-minded Managing Entities that are committed to the sustainable production of cotton for the benefit of all stakeholders while protecting the environment.

The CmiA standard builds on fair relations between

¹ To ensure that the sustainably produced cotton finds demand and uptake on international markets, CmiA is simultaneously establishing an international demand alliance of brands and retailers that purchase CmiA raw material and aiding members of the cotton and textile supply chains in integrating CmiA cotton into the value chain.



CmiA Managing Entities and farmers and between CmiA Managing Entities and ginnery workers and employees. In line with the CmiA philosophy of self-empowerment, relations between Managing Entities and CmiA-contracted farmers are based on agricultural and other training that can be provided by external experts or the Managing Entities' own extension services.

Managing Entities often serve as a de-facto development organisation, not only by purchasing agricultural produce and offering jobs in rural areas but also by providing services beyond the core business operations, e.g. by building infrastructure like schools, wells, or health stations. These efforts help improve resilience and living conditions in rural communities.

As African nations are experiencing increasing climate variability, especially in the form of extreme weather events like floods and droughts, farming communities need to become more resilient². Together with Managing Entities, CmiA strives to develop and implement adaptation strategies that improve the productivity, efficiency, profitability, and fairness of agricultural production and marketing systems.

PRINCIPLE 10:

CmiA Managing Entities provide CmiA-contracted farmers with access to high-quality inputs and input pre-financing.

Introduction to the Principle

In cotton growing areas, which are often remote, Managing Entities are frequently the farmers' only source of affordable agricultural inputs (e.g. seeds, fertiliser, and pesticides). By providing inputs on a credit basis, Managing Entities enable a large number of farmers to grow their crops and earn essential cash income. These larger-scale actors have easier access to credit and production techniques, often at favourable terms due to bulk purchasing. Purchasing seed cotton from farmers allows them to provide farmers with credit and inputs and to recuperate these loans at the time of harvest.

As cotton is an annual crop, farmers can and have to decide every year whether they will grow cotton at all, and on what land. For many small-scale farmers, cotton plays

an important role as a cash crop within their diversified farming system, which combines food and cash crops.

Managing Entities and farmers' groups, by which the farmers are contracted or under which they are organised, ensure access to the necessary inputs and facilitate the marketing of cotton. Core aspects for establishing and maintaining trust between farmers and Managing Entities are: clear contractual provisions, access to pre-financed inputs, transparent communication on prices of inputs and seed cotton, the transparent grading of seed cotton, and timely payment for cotton to farmers.

² The role of CmiA in reducing cotton cultivation's contribution to climate change is outlined under the Planet pillar of this standard.



CRITERION 10.1

→ Inputs provided to CmiA-contracted farmers by the Managing Entity are of high quality and delivered on time.

Intent

Agriculture is influenced by many factors out of the farmers' control. It is therefore all the more important that the manageable aspects are treated with the utmost care. Inputs provided by Managing Entities to CmiA-contracted farmers need to be of high quality and delivered on time. Both quality and timing have a significant influence on achievable yields:

- The choice of suitable seed varieties that are fit for rainfed conditions in a small-scale farming context is important. The breeding of new varieties that are particularly well adapted to local conditions is unfortunately not satisfactory across Sub-Saharan Africa. Nonetheless, Managing Entities should look for varieties with a high genetic potential for fruit formation and boll retention and with good fibre quality and high ginning outturn.
- Seeds need to be provided to farmers on time so that they can start planting when the soil is wet enough and rains are predicted for the one to three weeks after sowing (cf. criterion 8.2).
- Pesticides delivered to farmers are chosen according to recommendations from national cotton research while taking CmiA-specific requirements on excluded active ingredients into account. Since the trade of fraudulent pesticides has increased in scope and magnitude in recent years, including the repackaging of obsolete or illegal material, and since the contents of containers do not necessarily correspond to what is stated on the label, Managing Entities should take special care in the selection of pesticide suppliers and, at minimum, spot-check the quality of the pesticides procured.
- Pesticides need to be delivered on time and in line with good farming practices. Farmers need to be able to take action once the economic threshold is exceeded.
- If the Managing Entity provides fertilisers to CmiA-contracted farmers, it needs to consider the requirements of the cotton crop as well as the nutrient status of the soil. Publicly available data and soil tests for the Managing Entity's areas of operations are to be taken into account when procuring and distributing fertilisers.
- Just as with seeds and pesticides, fertilisers must be applied at the right time of the growing season, meaning that Managing Entities need to ensure that the farmers receive the fertilisers on time.



INDICATORS

No.	Core	Field	Ginnery
10.1.1	Cotton seeds distributed to CmiA-contracted farmers are nationally registered and have at least the minimum germination rate stipulated by seed legislation. The Managing Entity selects seed varieties that are fit for use in a rain-fed, small-scale farming context and deliver good quality fibres. Seeds should be treated unless intended for organic production.	✓	
10.1.2	Agro-chemicals and fertilisers (organic and chemical) are chosen according to recommendations from national cotton-research or other relevant cotton-sector organisations. All inputs are distributed before their use-by date.	✓	
10.1.3	The Managing Entity ensures that CmiA-contracted farmers receive the inputs provided by the Managing Entity on time, i.e. in line with good farming practices.	✓	
No.	Improvement	Field	Ginnery
10.1.4	The Managing Entity determines the germination rate of seeds before distribution. Germination rates below 85 percent, or lower as stipulated by law, are not acceptable and require action by the Managing Entity. The Managing Entity strives to reach a minimum germination rate of 85 percent, even if legal requirements are lower.	✓	
10.1.5	Prior to distribution, the Managing Entity checks that the concentration stated on the pesticide's product label corresponds to the actual concentration of the active ingredients contained in the product.	✓	
10.1.6	CmiA-contracted farmers have access to inputs provided by the Managing Entity, and have the freedom to purchase the same, either at the beginning of the season or on demand during the season (cf. criterion 10.2).	✓	
10.1.7	If so requested by CmiA-contracted farmers, non-utilised inputs provided by the Managing Entity can be given back to the Managing Entity by the farmers no later than one month before harvesting. The value of returned inputs is communicated at the moment the input is sold.	✓	

Guidance for Implementation

Seeds

A good crop requires good seeds. Seed quality is determined by a seed's genetics, health, vigour, and germination. Germination tests help determine seed viability, minimise the risk of germination failure, and ensure the establishment of seedlings in the field under ideal conditions.

Fuzzy seeds¹ should be avoided. Fuzzy seeds should be delinted to get rid of surface-borne pathogens and insects that are present on the linter. In addition, fuzzy seeds cannot be graded for vigour or treated for seedling protection against pest and diseases.

Delinted *Gossypium hirsutum* seeds can easily be graded for vigour using the floating test with room-temperature water. Seeds that sink in water have higher vigour and germination rates than those that float.

¹ Fuzzy seeds are seeds obtained directly after ginning, i.e. by separating fibres from the seed.



CRITERION 10.2

→ Prices for seeds, pesticides, and any other inputs are transparent to and known by CmiA-contracted farmers.

Intent

In combination with knowledge or good estimates regarding the buying price for seed cotton, transparent information about the prices for inputs and about other costs connected to the cultivation of cotton (such as soil preparation services) allows farmers to make informed production decisions at the beginning of the cultivation cycle. This includes decisions concerning the distribution of their available land for each crop cultivated and the proportions of land foreseen for cotton, other cash crops, and food crops.

INDICATORS

No.	Core	Field	Ginnery
10.2.1	The Managing Entity provides evidence that CmiA-contracted farmers were informed about prices for inputs—such as cotton seeds, pesticides, or fertilisers—provided by the Managing Entity on credit at the beginning of the production cycle, i.e. before the contracts are signed.	✓	
10.2.2	The Managing Entity offers inputs at fair prices. Input prices are considered to be fair if they are at or below market prices.	✓	
No.	Improvement	Field	Ginnery
10.2.3	The percentage of CmiA-contracted farmers who know the prices for cotton seed, pesticides, and other inputs.	✓	

Guidance for Implementation

Managing Entities can use various ways to inform farmers about input prices, including through contract terms and via extension staff, ITC¹, or radio messages.

To make sure that farmers are capable of making informed production decisions, the farmers need to have a good understanding of the costs that are connected with cultivating cotton before committing to sign a contract with the Managing Entity, i.e. at the beginning of the production cycle.

Strengthening farmers' entrepreneurial skills will further increase their understanding of input costs in relation to expected income (cf. indicator 12.1.1 on basic farm-business training).

¹ Information and communications technology, e.g. mobile text or audio messages



CRITERION 10.3

→ The Managing Entity offers pre-financing possibilities for inputs to interested CmiA-contracted farmers.

Intent

Access to finance and inputs is a problem, particularly in rural areas. In many cases, especially where a hungry season still exists, the hungry months correspond to the dry season. Relating to the crop cycle, the cash needs of farmers are most pressing at the beginning of the season, which is why pre-financing possibilities for the necessary inputs are often vital for farmers to get a good start on a successful crop season.

In some countries, there are government regulations that stipulate input distribution to farmers through central agencies, e.g. in Uganda by the Cotton Development Organisation. In these cases, this criterion is not applicable to Managing Entities operating under such framework conditions.

INDICATORS

No.	Core	Field	Ginnery
10.3.1	The Managing Entity can document that CmiA-contracted farmers have access to an input pre-financing scheme for cotton inputs. The use of the pre-financing scheme is voluntary.	✓	
No.	Improvement	Field	Ginnery
10.3.2	Any existing input pre-financing scheme offered by the Managing Entity is clear, transparent, and documented in a way that is easily understandable by CmiA-contracted farmers. The Managing Entity actively informs CmiA-contracted farmers about the input pre-financing terms and conditions.	✓	
10.3.3	If providing input pre-financing, the Managing Entity has a system in place to avoid excessive indebtedness by CmiA-contracted farmers and has suitable ways of debt recovery. Interest rates (if applied) are outlined and favourable compared to market rates.	✓	
10.3.4	The percentage of CmiA-contracted farmers who actually use the input pre-financing scheme offered by the Managing Entity and understand its terms and conditions.	✓	

Guidance for Implementation

Managing Entities can offer input pre-financing to farmers for agricultural inputs (e.g. cotton seed, fertilisers, or pesticides) and for mechanisation (e.g. oxen or rippers) or for other equipment. However, to prevent farmers from becoming overly indebted, the maximum amount of credits granted should be connected to a realistic estimation of the expected yields, including the area cultivated with cotton.

Where pre-financing possibilities exist for inputs, contracts between the Managing Entity and the farmers should state how credit recovery will take place, e.g. through sale of the totality of the farmers' cotton or only of the amount corresponding to the credit.



PRINCIPLE 11:

CmiA Managing Entities assist CmiA-contracted farmers in sustainably increasing cotton productivity and fibre quality.

Introduction to the Principle

While African cotton farmers are at a considerable competitive disadvantage due to difficult political framework conditions and while they cannot influence fluctuating world market prices, it is in their power to increase productivity and fibre quality—two parameters that can greatly affect a cotton-growing household's income.

The quality of the fibre produced is essential for its value. In addition, trash, contamination, and damage levels in seed cotton directly affect the efficiency of the ginning process and, in consequence, the quality of the lint cotton delivered to the international markets.

The inherent characteristics of the seed variety, the level of trash, and the level of contamination are three important

factors for fibre quality. By choosing the seed variety, the Managing Entity determines certain fibre characteristics. Although the options can be very limited, it is important to select seed varieties that suit the local geographic and seasonal conditions and the available/feasible management practices. It is equally important that the seeds delivered to farmers be of high quality, i.e. having high germination rates, varietal purity, and vigour. Farmers then need to apply crop management practices that positively affect both yields and fibre quality, such as timely planting, correct plant density, or disease, weed, and insect management. Finally, harvesting and post-harvest handling influence the quality of the seed cotton delivered to the ginnery; it should contain as little trash and contaminants as possible and be neither too wet nor too dry.





CRITERION 11.1

→ CmiA-contracted farmers adopt planting and management practices that maximise cotton productivity and fibre quality.

Intent

Despite having limited influence on genetic and seasonal quality characteristics, farmers can make the most of a given cotton variety's volume and fibre attributes by implementing a range of good agricultural management practices.

INDICATORS

No.	Core	Field	Ginnery
11.1.1	The Managing Entity regularly trains CmiA-contracted farmers in the most promising good agricultural practices (GAP) to maximise cotton productivity and fibre quality. At minimum, the training content includes: <ul style="list-style-type: none"> • timely and appropriate land preparation; • timely and correct planting; • correct plant population and density; and • timely and regular weeding to minimise competition with the crop. 	✓	
No.	Improvement	Field	Ginnery
11.1.2	In its training for CmiA-contracted farmers, the Managing Entity includes locally validated best practices for nutrient, pest, and disease management in order to maximise cotton productivity and fibre quality (cf. criteria 8.3 and 9.1).	✓	
11.1.3	The percentage of CmiA-contracted farmers who adopt recommended GAP and other practices for maximising fibre quality.	✓	

Guidance for Implementation

Good agricultural practices that can significantly affect the productivity and quality of seed cotton produced include but are not limited to:

- Timely land preparation
- Timely planting of locally adapted seed variety
- Planting seeds with proper spacing between plants and rows
- Timely and regular weed management
- Continuous pest scouting and management to avoid losses, boll damage, and sticky lint

- Crop rotation as a means of pest management
- Nutrient management to avoid both malnourished plants, which are prone to pest attacks and diseases, and over-fertilisation, which leads to excessive vegetative growth, thereby shifting energy away from boll formation and potentially reducing yields and increasing trash levels



CRITERION 11.2

→ CmiA-contracted farmers and Managing Entities harvest, manage, and store seed cotton in such a way as to minimise trash, contamination, and damage.

Intent

Improved harvest and post-harvest techniques are crucial for ensuring the best possible lint quality and better seed cotton prices for farmers. Harvest timing and management affect the level of trash¹ and risks of contamination². The Managing Entity can help reduce contamination risks, e.g. by providing appropriate, plastic-free materials for cotton picking. Furthermore, seed cotton needs to be protected from damage³ through informed decisions regarding how and where to store seed cotton and how to transport it to the point of purchase.

At the ginnery, similar attention needs to be paid to hygiene rules when storing and handling seed cotton and when wrapping and storing lint cotton bales. Appropriate storage facilities and moisture monitoring during storage play a critical role in minimising the risk of fire and mould damage.

INDICATORS

No.	Core	Field	Ginnery
11.2.1	The Managing Entity regularly trains CmiA-contracted farmers in good management practices for the harvest and storage of seed cotton.	✓	
11.2.2	The percentage of CmiA-contracted farmers who apply good management practices for the harvest and storage of seed cotton.	✓	
11.2.3	The Managing Entity's storage facilities, such as collection points and warehouses, are clean and well maintained to prevent contamination.	✓	
11.2.4	The Managing Entity's ginning facilities—including any equipment and areas for storage, handling, and processing—are clean and well maintained to prevent contamination.		✓
No.	Improvement	Field	Ginnery
11.2.5	Field evidence shows that no polypropylene, polyethylene, or any other synthetic materials are used during the harvesting, storage, or transportation of seed cotton.	✓	
11.2.6	The lint fibre is packaged in clean material that is sufficiently strong and properly sewn or sealed. Packaging material, including the coat of paint for bale identification, is non-toxic. The specifications of the packaging material are available.		✓

¹ Trash refers to cotton leaf remaining in the lint cotton after it has been ginned.

² Contamination refers to anything else found in the lint cotton that is not cotton fibre or cotton leaf, such as other plant material, human hair, or polypropylene threads.

³ Damage refers to degradation of the fibre, e.g. from fire caused by self-ignition or from mould.



Guidance for Implementation

Good practices for harvesting include:

- Picking only in dry conditions and avoiding harvesting when there is morning dew or after rainfall
- Harvesting in turns, i.e. picking only mature cotton
- Sorting out leaves and other contaminants
- Pre-sorting according to quality
- Using no plastic bags but rather wool packs, tissues, baskets, cotton bags, etc.

Good practices post-harvest include:

- Storing cotton in well-aired locations (to prevent fires)
- Preventing cotton from being contaminated with chemicals, sand, dust, metal, wire, or other inorganic contaminants
- Protecting cotton from rain
- Preventing access by livestock (e.g. chickens) and children (e.g. while playing)





PRINCIPLE 12:

CmiA Managing Entities enable CmiA-contracted farmers to improve their living conditions and resilience.

Introduction to the Principle

Managing Entities depend on continuous, high-quantity, and high-quality cotton production. They recognise that their business success is directly linked to the economic success of the cotton-growing farmers. To make cotton and other crops successful in the long term, cotton producers need to see farming as a business and, in consequence, think and act entrepreneurially. However, economic success alone will not be enough in the long run: To keep agriculture attractive to young people, rural areas need to continuously develop. Here, too, Managing Entities can play an important role through strategic community investments.

CmiA operates in a context where people often lack formal education and where improvements to farmers' skills and farm management practices are essential for bettering their living conditions. Climate change is changing the economics of production, and farmers need to consider multiple livelihood strategies, including planting different crops and seeking alternative, non-farm income streams.

Managing Entities implement training and education programmes for all farmers to support compliance with and development in accordance with the CmiA standard. The outcome is better management and decision making by better-skilled and more knowledgeable farmers. However, technical know-how in agriculture alone is not enough. In order to be competitive and take advantage of new opportunities, farmers have to increasingly adapt their farm business to improve efficiency, profitability, and income. It has also been shown that improved entrepreneurial skills lead to better application of agricultural training.

There are different approaches to teaching the basics of farm business management, including the farmer business school (FBS) approach of GIZ¹. While farmers participating in FBS (or other fundamental business training) need to have basic literacy and numeracy skills, they are not required to have any significant formal education.

Managing Entities usually run ginning factories in remote rural areas that are often disconnected from infrastructural developments in cities. To avoid rural flight and to keep agriculture attractive to young people, investments are needed to improve the living conditions of rural communities. Managing Entities often engage in community investment efforts as a way to promote local development and benefit stakeholders in their areas of operations. They are committed to supporting smallholder communities in areas such as education, health, gender equality, and environmental protection.

In order to implement successful projects, Managing Entities' strategies must be aligned with the development priorities of local communities, governments, and civil society to create shared value. Managing Entities can assist communities and local governments in defining and meeting their own development goals and aspirations through participatory planning and decision making.

1 Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH



CRITERION 12.1

→ CmiA-contracted farmers optimise their farm business to achieve a decent standard of living and to be resilient against changes in the market or the climate.

Intent

Most small-scale farmers can look back on several generations of family experience in agricultural production on their farms, on which they cultivate various food and cash crops. However, a lack of formal education and skills makes it difficult for them to run their farm as a profitable business, e.g. as they do not keep track of their costs and lack the tools to make effective business decisions. By gaining more business knowledge and skills, farmers become better decision makers.

Training in basic entrepreneurial skills strengthens the farmers' capacities, e.g. enabling them to calculate the return of their own labour (through input-output calculations). With training in gross margin calculations and accounting practices, farmers can develop the skills needed to run successful and profitable businesses, thereby increasing their income and improving the quality of life for their entire family.

In the long term, small-scale farmers should be enabled not to rely exclusively on pre-financing facilities. While the tendency and ability to save is still largely limited among cotton farmers, the undercapitalisation of small-scale farmers should also be addressed through improved financial management and dedicated savings schemes.

INDICATORS

No.	Core	Field	Ginnery
12.1.1	The Managing Entity provides basic farm-business training to CmiA-contracted farmers. This training includes: <ul style="list-style-type: none"> • Profitability calculations for cotton and other crops included in the regular rotation cycle (input-output calculations) • Planning agricultural production to meet family needs for food and to provide the income needed for a decent standard of living • The importance of diversification • The importance of record keeping 	✓	
12.1.2	The Managing Entity assists CmiA-contracted lead farmers in keeping farm-level records for their own farm. At minimum, these records encompass essential production data for inputs and outputs, including hired labour if applicable.	✓	
No.	Improvement	Field	Ginnery
12.1.3	The Managing Entity assists CmiA lead farmers in collecting core data from farm-level records of inputs and outputs for CmiA-contracted farmers within their purview.	✓	
12.1.4	The Managing Entity calculates gross margins from cotton earned by an average CmiA lead farmer and an average CmiA-contracted follower farmer.	✓	
12.1.5	The percentage of CmiA-contracted farmers who have diversified their agricultural production or other sources of income to ensure their family's food and nutrition security and to adapt to changes in the market or the climate (cf. criterion 7.5).	✓	



Guidance for Implementation

Farmers' basic entrepreneurial skills can be increased through different approaches, including the farmer business schools (FBS), a concept developed by GIZ. Many farmers do not write down how much money comes in and how much money goes out of their business. Record-keeping means that farmers know how much they spend and how much they earn from their farm business, whether or not they are generating a profit, and what the problem areas are. To be useful, records need to be accurate, neat, complete, clearly written, and be regularly analysed.

- Financial records document all financial transactions (income and expenditure)
- Sales records list the volume, value, and name of buyer for each transaction

Other types of documentation kept by farmers (e.g. in field books) include:

- Planting records summarising data regarding planting dates, inputs used (quantity and type), and labour requirements

- Land-use records listing types of use like land preparation and conservation
- Weather records logging rainfall, temperature, humidity, etc.
- Maintenance records documenting operations like planting, weeding, and pesticide or fertiliser application

Family farm businesses should keep records. This responsibility should be shared by all family members, and responsibility for any type of record should be allocated to the most capable family member, regardless of their sex.

Where records are not kept in writing, oral evidence given by farmers can be included as evidence that they have understood the concept and apply it for their farms.





CRITERION 12.2

→ The Managing Entity identifies opportunities to support livelihood improvements for CmiA-contracted farmers, their ginnery workers, and associated communities.

Intent

While a Managing Entity's biggest contribution normally lies in the positive impact of the business itself—through employment, contracts, and tax payments—voluntary community investments offer an important additional way to enhance positive impacts and socioeconomic benefits.

CmiA expects Managing Entities to show an awareness of social and environmental issues within their farmer and worker bases and encourages Managing Entities to actively implement projects that sustainably improve the livelihoods of associated rural communities. To this end, they engage in activities in the areas of education, health, gender, and the environment, including nature conservation, wildlife protection, and renewable energy.

To achieve the greatest impact, it is important for Managing Entities to focus selectively on a few key areas. Every Managing Entity should identify where it can most effectively leverage its unique role and competencies to address and align with community priorities. All activities should support communities and local governments in defining and meeting their own development goals and aspirations through participatory planning and decision making.

Managing Entities avoid dependency, encourage self-reliance, and create long-term benefits that outlast their direct support. They also only commence activities with a viable exit or handover strategy, focussing on capacity building, participatory processes, and organisational development to enable local communities, institutions, and partners to take progressively greater roles and responsibilities.

Managing Entities also establish outcome and impact indicators to measure the quantity and quality of change, using participatory methods of monitoring and evaluation to build trust and local ownership of outcomes.

INDICATORS

No.	Improvement	Field	Ginnery
12.2.1(a)	The Managing Entity is aware of social and environmental hot spots among its CmiA-contracted farmers and identifies opportunities to support livelihood improvements.	✓	
12.2.1(b)	The Managing Entity is aware of social and environmental hot spots within the community where the CmiA ginneries are located and identifies opportunities to support livelihood improvements.		✓
12.2.2(a)	The Managing Entity has a systematic approach to addressing identified needs and actively supports activities for CmiA-contracted farmers in the areas of education, health, gender equality, and the environment. Indicators for measuring the success of implemented activities are put into place and applied.	✓	
12.2.2(b)	The Managing Entity has a systematic approach to addressing identified needs and actively supports activities for the community in which the CmiA ginneries are located in the areas of education, health, gender equality, and the environment. Indicators for measuring the success of implemented activities are put into place and applied.		✓



Guidance for Implementation

CmiA encourages Managing Entities to develop a strategic approach to analysing needs and implementing projects to the benefit of the rural communities that are cultivating and ginning cotton. The CmiA Community Cooperation Programme (CCCP) represents an instrument for Managing Entities to increase the financial resources available for such investments. CmiA also encourages Managing Entities to seek additional support from donors or the government.

Projects to be realised can include but are not limited to: building or restoring school infrastructure; organising literacy courses for illiterate community members; projects in water, sanitation, and hygiene (WASH); providing access to water; HIV/AIDS awareness raising; support for local health stations; kick-starting additional income-generating activities for female farmer groups; planting trees or hedges; waste collection and recycling; or habitat management to avoid human-wildlife conflict.

The Managing Entity follows best practices by coordinating its activities with relevant local authorities and ensuring the involvement of local communities/beneficiaries in project decisions. For communities, shared decision making

is about respect and ownership. Services and goods should not be provided for free, as this creates dependency, and experience shows that handouts and free services earn only temporary goodwill from communities. Requiring community contributions, in cash or in kind, will reveal what communities and government value most.

A simple monitoring and evaluation process should be established, and projects should be planned in a way that sustains intended impacts beyond the conclusion of the specific project. Systematically tracking and measuring outputs is essential. This requires collecting baseline data and setting indicators that not only measure the volume of money spent or the total number of outputs but include the quality of outcome as well.

Activities and programmes can be supported by donors and/or the government.



ANNEX A: Acronyms

AbTF	Aid by Trade Foundation
CA	Conservation Agriculture
CBA	Collective Bargaining Agreement
CIP	Continuous-improvement plan
CmiA	Cotton made in Africa
CoC	Chain of Custody
FAO	Food and Agriculture Organization of the United Nations
FBS	Farmer Business School
GAP	Good Agricultural Practices
GHS	Globally Harmonised System of Classification and Labelling of Chemicals
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH = German Society for International Cooperation
GMO	Genetically Modified Organisms
HIP	Hard Identity Preserved
IBA	Important Bird Areas
ILO	International Labour Organisation of the United Nations
IPPM	Integrated Production and Pest Management
ITC	Information and Communications Technology
IUCN	International Union for Conservation of Nature
MB	Mass Balance
MSDS	Material Safety Data Sheets
OECD	Organisation for Economic Co-operation and Development
PIC	Rotterdam Convention: Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade
PPE	Personal protective equipment
POPs	Stockholm Convention on Persistent Organic Pollutants
SCS	Sustainable Cotton Standard
ToC	Theory of Change
ToT	Training of Trainers
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organisation
WHO	World Health Organisation of the United Nations

ANNEX B: Glossary

Adult	A person who is 18 years of age or older.
Bonded labour	A specific type of forced labour that extracts work or service from a person through the imposition of a bond, often in the form of a debt (e.g. through large pay advances for food, equipment, or transportation fees) that cannot be repaid by the worker on the basis of his or her low wages (cf. ILO Conventions 29 and 135).
Collective bargaining	Collective bargaining means carrying on negotiations through an appropriate bargaining unit for the purpose of concluding a collective agreement (cf. ILO Conventions 87 and 98).
Collective bargaining agreement	A collective bargaining agreement (CBA) is an agreement that is negotiated by an appropriate bargaining unit and that lays down the terms and conditions affecting the employment and remuneration of employees.
Conservation agriculture	Conservation agriculture (CA) is an approach to managing agro-ecosystems for sustainably improved productivity, profits, and food security while preserving and enhancing the resource base and the environment. The three key principles are minimal soil disturbance, permanent soil cover, and crop rotation (cf. FAO).
Contamination	Any foreign matter, i.e. any material other than cotton or trash (cotton leaf), either in seed cotton or lint cotton. It may be natural (e.g. bark, other plant materials, bird feathers, animal or human hair, sand, or dust) or man-made (e.g. pieces of polyethylene string or other plastics, paper, cloth, jute, grease, or machinery parts). Contamination can occur during picking, transport, or ginning. Contamination continues to be a key parameter for fibre quality in the production pipeline, with cotton that is perceived to be contaminated being heavily discounted.
Continuous-improvement plan (CIP)	Action plan established by the CmiA Managing Entity after each verification mission. Based on verifiers' findings and shared experiences, it defines actions to be taken in the following years and specifies the associated goals, timeline, and persons in charge. The continuous-improvement plan (CIP) is submitted to AbTF within a set timeframe after each verification mission.
Core indicator	A CmiA indicator that must be met by all CmiA-verified Managing Entities. If a certain entity does not meet this indicator at a satisfactory level, it cannot receive a CmiA certificate.
Cotton club	Learning groups created for the purpose of knowledge transmission concerning agricultural practices and skills, either by farmers themselves or with Managing Entity support. Synonyms include "field clubs" and "(cotton) field school".
Cotton seed	Seeds used for planting cotton. Depending on the type of treatment used, cotton seeds can be used as fuzzy seeds, (acid) delinted seeds, or coated seeds.
Crop rotation	Crop rotation refers to the alternating cultivation of different types of crops in the same field in consecutive seasons. It helps fight erosion, pests, and diseases and is beneficial for soil structure and organic matter, thus maintaining soil fertility. A well-designed crop rotation can reduce the need for external inputs (e.g. pesticides or fertilisers) by making better use of ecosystem services from a diverse set of crops.
Decent work	Decent work sums up the aspirations of people in their working lives. It encompasses productive work opportunities that: deliver a fair income; ensure safe, secure, and healthy working conditions; contribute to social protection and integration for both individuals and families; grant prospects for personal development; ensure freedom of expression and association; and protect the right to collective bargaining and equal treatment and opportunities for all women and men (cf. ILO Decent Work Agenda)

Demo plot / demo farmer	A demo plot is agricultural land used for demonstration purposes within the framework of farmer training conducted by “lead farmers” (or “demo farmers”) who have been appointed to transmit knowledge on agronomic practices (and other CmiA-relevant topics) to cotton farmers. Demo plots include the cultivation of the rotation crop and demonstrations of practices to grow a healthy, safe, and nutritious crop.
Environmental footprint	The environmental footprint is a measure of human impact on the Earth's ecosystems. It includes factors of both resource consumption (e.g. water, land use, crop land, forest, and fishing grounds) and environmental pollution (e.g. production of harmful gases, landfills, and the area required to absorb all emitted waste). This term also encompasses more specific categories, such as carbon footprints and water footprints (cf. WWF, Global Footprint Network).
Environmental management plan	The environmental management plan is set up by the Managing Entity, which therein establishes effective policies, procedures, and guidelines reflecting their environmental responsibility. The environmental management plan includes appropriate measures and practices for mitigating the negative environmental impacts of cotton production (cultivation and ginning).
Field verification	An inspection of small-scale farms—selected through risk-based sampling methods—that are contracted by a Managing Entity. Inspections are conducted by independent third-party verifiers and include a preparatory general meeting with the Managing Entity's management team. In rotation with ginnery verifications, field verifications take place every two years.
Forced labour	The ILO Forced Labour Convention (No. 29) defines forced or compulsory labour as “all work or services which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily”. See also: bonded labour
Fundamental Labour Conventions (of the ILO)	The eight fundamental ILO conventions are: <ol style="list-style-type: none"> 1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) 2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98) 3. Forced Labour Convention. 1930 (No. 29) (and its 2014 Protocol) 4. Abolition of Forced Labour Convention, 1957 (No. 105) 5. Minimum Age Convention, 1973 (No. 138) 6. Worst Forms of Child Labour Convention, 1999 (No. 182) 7. Equal Remuneration Convention, 1951 (No. 100) 8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
Gender equality	Gender equality means that women and men enjoy the same rights, resources, opportunities, and protections, including economic participation and decision making. It also requires different behaviours, aspirations, and needs to be valued equally, regardless of gender.
Genetically modified organisms	Genetically modified organisms (GMO) are organisms (plant, animal, microorganism, or other) whose genetic material (DNA) has been modified in a laboratory using genetic engineering or transgenic technology. This creates combinations of plant, animal, bacterial, and viral genes that do not occur in nature or through traditional crossbreeding methods.
Ginnery	Factory where the first processing stage of cotton is performed, i.e. where the cotton lint (fibre) is removed from the cotton seed.
Ginnery verification	An inspection of a Managing Entity's ginnery plants and working processes that is regularly conducted by independent third-party verifiers in a two-year cycle. Because cotton ginning is a seasonal activity, and to make sure that seasonal and casual workers are also included in the observations and interviews, the ginnery verification must always take place at a time when the ginnery is fully operational.

Good agricultural practices	<p>Good agricultural practices (GAP) are “practices that address environmental, economic, and social sustainability for on-farm processes and result in safe and quality food and non-food agricultural products”. The objectives of these good agricultural practices include:</p> <ul style="list-style-type: none"> • timely and appropriate land preparation; • timely and correct planting; • correct planting densities; • timely and regular weeding to minimise competition with the crop; • continuous pest scouting and management to avoid losses, boll damage, and at sticky lint; • crop rotation as a means of pest management; and • nutrient management.
Grading	Grading of seed cotton is an assessment during which the quality of cotton is determined according to characteristics like colour and visible trash.
Hazard	Hazard refers to the inherent potential of a substance, agent, or situation to cause undesirable consequences, e.g. properties that can cause adverse effects or damage to health, property, or the environment.
Improvement indicator	A CmiA indicator that indicates Managing Entities’ sustainability performance beyond the level of core indicators.
Integrated production and pest management	Integrated production and pest management (IPPM) emphasises growing a healthy crop, combatting pest populations with the least possible disruption to agro-ecosystems, and encouraging natural pest-control mechanisms. All available techniques of pest control (such as biological control via the use of beneficial insects or microbes, the use of crop-resistant varieties, and the use of alternative agricultural practices through spraying, fertilising, or pruning) are carefully considered in order to avoid pest development whilst keeping the use of pesticides and other interventions to economically justifiable levels, thereby ensuring minimal risks to human and environmental health (cf. FAO).
Intercropping	Intercropping is a multiple-cropping practice that involves simultaneously growing two or more different crops in close proximity (e.g. in the same field or plot).
Labour inspection	According to ILO Convention 81, labour inspections are essential to the labour administration system, exercising the fundamental function of labour law enforcement and effective compliance. Labour inspections assess the enforcement of legal provisions, particularly with regard to workers’ rights, while also providing information, advice, and training.
Legumes / leguminous crops	Legumes are plants in the Fabaceae family (or Leguminosae), most of which have symbiotic nitrogen-fixing bacteria in their root nodules. For that reason, legumes play a key role in crop rotation by increasing soil fertility. Common legumes include alfalfa, peanuts, chickpeas, peas, soybeans, and other types of beans.
Lint cotton	A raw material product (fibre) created by the first stage of processing (i.e. ginning). Lint cotton is a result of the process of extracting cotton seed from the harvested crop.
Managing Entity	<p>A Managing Entity is an organisation (such as a cotton company, a ginnery, or an institution in the cotton sector) whose role it is to manage compliance and continuous improvement with regard to CmiA core and improvement indicators.</p> <p>Requirements: The main requirement for a Managing Entity is the ability to exercise downstream management control, as reflected in Pillar 1 (Management) of the CmiA standard.</p> <p>In the CmiA verification process, the CmiA Managing Entity:</p> <ul style="list-style-type: none"> (1) is responsible for submitting annual self-assessments to AbTF; (2) is the first point of contact for the verifiers and plays a key role in regular verification; and (3) is responsible for defining measures and priorities of action in the continuous-improvement plan (CIP).

Manure	Manure is organic matter that is used as organic fertiliser. While most manure consists of animal faeces, other sources include compost and green manure. Manure contributes to the fertility of soil by adding organic matter and nutrients that are utilised by bacteria and other organisms in the soil.
Molasses traps	Molasses traps are an important technique in natural pest control. Traps are filled with a molasses solution to attract many harmful pests (such as the moths of the bollworm <i>Helicoverpa</i>), as the moths follow the scent and will drown in the water-molasses solution. Molasses traps can therefore help reduce pest pressure by preventing the moths from laying their eggs and by allowing pest prevalence in the region to be monitored.
Pegboard	Southern African designation for hand-made cardboard cut-outs used for the scouting and counting of pests as a means of decision making with regard to the application of pesticides.
Personal protective equipment (PPE)	Personal protective equipment, commonly referred to as “PPE”, is equipment worn to minimise exposure to hazards that can cause serious workplace injuries and illnesses. These injuries and illnesses may result from contact with chemical, physical, electrical, mechanical, or other workplace hazards. Personal protective equipment may include items such as gloves, safety glasses and shoes, earplugs or earmuffs, hard hats, or coveralls and vests.
Pesticide	<p>FAO defines a pesticide as any substance or mixture of substances intended to repel, destroy, or control any pest. The term includes substances intended for use as a plant growth regulator, defoliant, desiccant, or agent for thinning fruit or preventing fruit from falling prematurely. It is also used for substances applied to crops either before or after harvest to protect the commodity from deterioration during storage and transport.</p> <p>In general, a pesticide is a chemical or biological agent that deters, incapacitates, kills, or otherwise discourages pests. Sub-categories of the term pesticide include herbicide, insecticide, nematicide, molluscicide, piscicide, avicide, rodenticide, bactericide, insect repellent, animal repellent, antimicrobials, and fungicide. Most pesticides are intended to serve as plant protection products, protecting plants from weeds, fungi, or insects. In general, targets are organisms that destroy property, cause a nuisance, spread disease, or are disease vectors. In addition to their benefits, pesticides have drawbacks like potential toxicity to humans and other species.</p>
Risk	The chance of something happening that will have an impact on objectives. It is measured in terms of a combination of the probability of an event and its consequence.
Scouting	Scouting refers to the technique of assessing the grade of pest infestation in order to make a reasonable decision as to the necessity and extent of pesticide application. During scouting, a fixed number of cotton plants per cotton plot are observed, and pests and beneficial insects on them are counted.
Seed cotton	The raw material product, directly harvested from the cotton plant.
Segregation	Procedures to prevent mixing product coming from CmiA farmers with that of non-CmiA farmers, e.g. by treating cotton from different sources separately.
Self-assessment	A CmiA tool that constitutes the first step in the verification process, in which the Managing Entity to be verified provides the Aid by Trade Foundation as well as the respective independent third-party verifier with a general overview concerning certain requested data (such as farmer numbers, crop yields, or completed training) and a detailed self-evaluation regarding the criteria and indicators of the CmiA standard.
Small-scale farm/farmer or smallholder farm/farmer	A small-scale farm is a farm that primarily relies on family/household labour or reciprocal workforce exchange with other members of the community. Temporary workers can be contracted during limited periods for the harvest season, but permanent labour must not be contracted. The farm size usually does not exceed 20 hectares of cotton.
Third-party verification	Assurance activity performed by a person or body that is independent of the person or organisation providing the claim (in this case, the CmiA standard) and has no user interests in that claim (adapted from ISO 17029).

Trash	Refers to the leaf material found in seed cotton or cotton lint. Trash content is a measure of the amount of leaf material in a bale of cotton. It is affected by the plant variety and by harvesting methods and conditions. Hand-picked cotton—the predominant harvesting method among small-scale farmers—is usually much less contaminated by trash than mechanically harvested cotton.
Threshold spraying	The practice of pesticide application guided by the level of pest infestation as assessed through scouting. Only if a pre-defined threshold level of pest infestation is reached will synthetic pesticides be applied.
Verification	<p>Verification is the confirmation—through objective evidence—that specified requirements have been fulfilled. Verification is applied to claims regarding events that have already occurred or results that have already been obtained (i.e. serving to confirm truthfulness). When determining whether the claim can be confirmed, verifiers need to gather information and develop a complete understanding regarding fulfilment of the specified requirements. This can include evaluating relevant data and plans, reviewing documentation, performing alternative calculations, visiting sites, and interviewing people. The decision as to whether or not the claim conforms with the initially specified requirements is then issued by the verifier in the verification report (adapted from ISO 17029).</p> <p>For the purposes of CmiA, the verification will verify a CmiA Managing Entity's compliance with the CmiA standard and its principles, criteria, and indicators and the corresponding guidelines as well as with the AbTF Assurance Manual document. Verifiers must use the appropriate methodology and verification tools. The term verification includes all appropriate types of verification, regardless of the applied methodology or scope.</p>
Verifier	A person appointed and authorised to deliver a qualified verification judgment on the performance of the CmiA Managing Entity. The verifier shall collect evidence by examining documents, conducting interviews, and performing on-site inspections. The requirements regarding the qualification and accreditation of verifiers can be found in the CmiA Assurance System document.
Witness verification	A witness verification serves to verify the performance of the verification body, including the performance of the verifier team. Typically, these verifications are performed by the standard owner or by consultants hired by the standard owner. They have no impact on verification results.

ANNEX C: From Vol. 3.1 to Vol. 4: Where to Find Retained Criteria

Due to the comprehensive revision of the standard, it is simpler to list where in Volume 4 of the CmiA standard already existing criteria from Vol. 3.1 can be found. The criteria or the description of the assessments according to the traffic light system are only partly reproduced verbatim under the indexed Vol. 4 criteria or their associated indicators. Often, the new indicators go beyond the old formulations. In a few cases, the references correspond to the old contents in spirit but not in word.

All other criteria and indicators set out in Volume 4 are new.

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Criterion	Description	Pillar	Principle	Level	Criterion
Exclusion Criteria					
Excl. 1	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	People	4	Field	4.1
Excl. 2	Cotton production under irrigation.	Planet	8	Field	8.1
Excl. 3	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.	People	6	F/G	6.1
Excl. 4	Trafficking of persons (as defined by UN Palermo Protocols)	People	4	F/G	5.1
Excl. 5	Bonded or forced labour (as defined by ILO Convention 29 and 105)	People	4	F/G	5.1
Excl. 6a	Discouraging foundation and/or membership of/in institutional structures (Discouraging Freedom of Association, as defined by ILO Convention 87)	People	5	Ginnery	5.5
Excl. 6b	Discouraging and/or ignorance of the right to and the outcomes of Collective Bargaining (as defined by ILO Convention 98)	People	5	Ginnery	5.5

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Criterion	Description	Pillar	Principle	Level	Criterion
Exclusion Criteria					
Excl. 7	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.protected-planet.net/ c) Ramsar Convention on Wetlands: http://www.ramsar.org/pdf/sitelist.pdf	Planet	7	Field	7.2
Excl. 8	Non-submission of input and production data in annual self-assessments as prescribed by AbTF.	Management	3	F/G	3.4
Excl. 9	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	Planet	9	Field	9.3
Excl. 10	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	Planet	9	Field	9.5
Excl. 11	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.	Management	3	Field	3.4
Excl. 12	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 languages.	Planet	9	Field	9.2
Excl. 13	The Managing Entity has no time-bound plan regarding the introduction of integrated production and pest management (IPPM), 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	Planet	9	Field	9.1
Excl. 14	Commercial growing of GMO-Cotton.	Planet	8	Field	8.1

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Criterion	Description	Pillar	Principle	Level	Criterion
Exclusion Criteria					
Excl. 15	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)	Management	1	F/G	1.1
Excl. 16	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)	People	5	Ginnery	5.9
Excl. 17	Discrimination in the workplace (as defined in ILO Convention 111)	People	5	Field	5.2

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Criterion	Description	Pillar	Principle	Level	Criterion
Farm Level Criteria					
Farm Sust. 1	Social welfare programs <i>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 more such donor or government supported social welfare programme. Furthermore, indicators are in place to measure its success and success is measured.</i>	Prosperity	12	F/G	12.2
Farm Sust. 2a	Written contracts <i>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.</i>	People	5	Field	5.7
Farm Sust. 2b	Equal rights regarding gender <i>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.</i>	People	6	F/G	6.2
Farm Sust. 3a	Soil and water conservation <i>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.</i>	Planet	8	Field	8.2; 8.3
Farm Sust. 3b	Crop rotation <i>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.</i>	Planet	8	Field	8.3

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Criterion	Description	Pillar	Principle	Level	Criterion
Farm Level Criteria					
Farm Sust. 4a	Pesticide management <i>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.</i>	Planet; Management	9; 3	Field	9.1; 3.2
Farm Sust. 4b	Storage and transport of pesticides <i>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.</i> <i>(More than 80% of the farmers visited store their chemicals correctly and prevent access by children.)</i>	Planet	9	Field	9.10; 9.11
Farm Sust. 4c	Spraying of pesticides and health protection <i>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.</i> <i>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).</i> <i>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).</i> <i>More than 80% of the sampled operators use protective clothing throughout a campaign, that means</i> - 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. <i>Field evidence demonstrates that operators are not pregnant or nursing females or underaged.</i> <i>There are measures in place to promote the use of safer application equipment and success is measured.</i>	Planet	9	Field	9.8; 9.6

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Criterion	Description	Pillar	Principle	Level	Criterion
Farm Level Criteria					
Farm Sust. 4d	<p>Disposal of empty plant protection chemical containers</p> <p><i>The Managing Entity provides sufficient evidence to demonstrate that farmers have been trained regarding the dangers of reusing empty pesticide containers and how to dispose of these in a safe manner such as burning, burring 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.</i></p> <p><i>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, burring or disposal in a pit latrine w/o health and env. risk).</i></p>	Planet	9	Field	9.11
Farm Sust. 4e	<p>Integrated Production and Pest Management (IPPM) /pest thresholds</p> <p><i>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 being applied by at least 80% of sampled farmers.</i></p>	Planet	9	Field	9.1
Farm Sust. 5	<p>Training to improve farmer's skills and capacities</p> <p><i>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.</i></p> <p><i>This does not imply that the Managing Entity has to undertake the training. Training content should include:</i></p> <ul style="list-style-type: none"> <i>• early and appropriate land preparation</i> <i>• timely planting (and seed is available in time)</i> <i>• correct plant population and density</i> <i>• regular weeding to prevent competition with the crop</i> <i>• harvesting techniques, including control of polypropylene contamination.</i> 	Prosperity	11	Field	11.1
Farm Sust. 6a	<p>Pre-financing of inputs</p> <p><i>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.</i></p>	Prosperity	10	Field	10.3

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Criterion	Description	Pillar	Principle	Level	Criterion
Farm Level Criteria					
Farm Sust. 6b	<p>Transparency of input and cotton seed prices for farmers</p> <p><i>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.</i></p> <p><i>The Managing Entity can prove fair pricing methods 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).</i></p> <p><i>Alternatively:</i></p> <p><i>In a competitive market environment, input prices are considered to be fair if they correspond to market prices or are lower.</i></p>	Prosperity	10	Field	10.2
Farm Sust. 6c	<p>A transparent system to grade seed cotton is in place</p> <p><i>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.</i></p>	People	5	Field	5.8; 5.7
Farm Sust. 6d	<p>Maximising fibre and lint quality through improved harvesting and post harvesting techniques</p> <p><i>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 promising harvest and post-harvest techniques in the training and actively discourages farmers to utilize polypropylene bags for harvesting.</i></p>	Prosperity	11	Field	11.2
Farm Sust. 6e	<p>Payment of cotton to farmers</p> <p><i>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.</i></p>	People	5	Field	5.8

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Criterion	Description	Pillar	Principle	Level	Criterion
Ginnery Level Criteria					
Ginnery Sust. 1	Labour contracts in ginneries <i>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.</i>	People	5	Ginnery	5.9
Ginnery Sust. 2	Working hours in ginneries are regulated and overtime work (includes shift and night allowances) is remunerated <i>Working hours comply with national law and overtime working hours are fully remunerated in line with local requirements.</i>	People	5	Ginnery	5.10
Ginnery Sust. 3	Wages in ginneries comply with national law or sector agreements <i>Wages of permanent workers/employees are above existing national minimum wages (including allowances) or sector agreements, whichever 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.)</i>	People	5	Ginnery	5.9
Ginnery Sust. 4	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. <i>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.</i>	People	5	Ginnery	5.14; 5.12
Ginnery Sust. 6	Environmental management plan <i>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 undesirable environmental impacts incl. potential investment requirements. Legal requirements and requirements embedded in the operating licence are observed and adhered to.</i>	Planet	7	Ginnery	7.1

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Criterion	Description	Pillar	Principle	Level	Criterion
Management Criteria					
Mgmt. 1a	Policies <i>Policies are developed by the Managing Entity describing the overall position of the Unit with regard to the CmiA claim.</i>	Management	2	F/G	2.2
Mgmt. 1b	Policies <i>The Managing Entity actively communicates position and policies within the CmiA Unit.</i>	Management	2	F/G	2.2
Mgmt. 2a	Identification of required action and improvement opportunities <i>The Managing Entity has a mechanism to implement and govern the policies.</i>	Management	2	F/G	2.3
Mgmt. 2b	Identification of required action and improvement opportunities <i>The Managing Entity 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.</i>	Management	2	F/G	2.3
Mgmt. 2c	Identification of required action and improvement opportunities <i>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).</i>	Management	2	F/G	2.3
Mgmt. 3a	Management plan <i>The Managing Entity demonstrates the ability to formulate specific objectives to improve on the most important local issues to move towards more sustainable practices.</i>	Management	2	F/G	2.5
Mgmt. 3b	Management plan <i>The Managing Entity has planned specific targets to achieve the objectives and has set target dates for the required action items.</i>	Management	2	F/G	2.5
Mgmt. 3c	Management plan <i>The Managing Entity has secured funding e.g. with donors, AbTF, government or own resources.</i>	Management	2	F/G	2.5
Mgmt. 4a	Implementation capacity <i>The Managing Entity has the ability to implement and pursue required actions with funds and resources.</i>	Management	3	F/G	3.1; 3.2
Mgmt. 4b	Implementation capacity <i>The management plan is also reflected in budgeting/planning for the consecutive years to reflect continuity.</i>	Management	3	F/G	3.1
Mgmt. 4c	Implementation capacity <i>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.</i>	Management	3	F/G	3.2
Mgmt. 5a	Review and monitoring <i>The Managing Entity has formulated performance indicators to monitor the progress of the management plan towards the different targets.</i>	Management	2	F/G	2.5

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Criterion	Description	Pillar	Principle	Level	Criterion
Management Criteria					
Mgmt. 5b	Review and monitoring <i>The Managing Entity has procedures in place to review the progress against the Management Plan on a regular basis to:</i> <i>(i) Confirm Progress</i> <i>(ii) Address issues and risks</i> <i>(iii) Adjust actions and plan to ensure success of the actions.</i>	Management	2	F/G	2.5
Mgmt. 5c	Review and monitoring <i>The Managing Entity has instruments in place to regularly review the CmiA Unit to identify potential noncompliance to own objectives and targets as well as potential breaches of the exclusion criteria.</i>	Management	2	F/G	2.3
Mgmt. 5d	Review and monitoring <i>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.</i>	Management	1	F/G	1.3
Mgmt. 6	Continuity <i>The Managing Entity has measures in place to ensure continuity of the achieved objectives.</i>	Management	2	F/G	2.5
Mgmt. 7	Corrective action <i>The Managing Entity has procedures and instruments in place to implement corrective actions resulting from the review and monitoring activities.</i>	Management	2	F/G	2.3; 2.5
Mgmt. 8	Incidents and emergencies <i>The Managing Entity demonstrates to react appropriately to emergencies and incidents happening in areas under which it has management control (e.g. gins).</i>	People	5	Ginnery	5.13

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.

With the Cotton made in Africa (CmiA) initiative, AbTF is putting its principles into practice. The trade partners of the CmiA Demand Alliance source African cotton produced according to the CmiA standard and pay the foundation a volume-based license fee that is reinvested in the cultivation areas. Consumers recognise products by the CmiA label and make a valuable contribution to protecting the environment and supporting smallholder farmers and their families in Africa.

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