



**COTTON
MADE IN
AFRICA**



Assurance Manual

**for Cotton made in Africa (CmiA)
and Other Cotton Standards of the
Aid by Trade Foundation**

Version 1.1 (December 2022)



Contact

Aid by Trade Foundation
Gurlittstraße 14
20099 Hamburg
Germany

Tel. +49 40 - 25 76 755 0

Email: info@abt-foundation.org

Contact for comments: standards@abt-foundation.org

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Document History

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List of Acronyms

AbTF	Aid by Trade Foundation
CmiA	Cotton made in Africa
CoC	Chain of Custody
CAP	CmiA Assurance Platform
CIP	Continuous-Improvement Plan
SCS	Sustainable Cotton Standard
MB	Mass Balance
HIP	Hard Identity Preserved
USP	Unique Selling Proposition
S&O Unit	Standard & Outreach Unit of AbTF
NGO	Non-governmental organisation





1 INTRODUCTION

1.1. Purpose and Scope of the Assurance Manual

1. The Assurance Manual is a critical component of the Aid by Trade Foundation's (AbTF) cotton standards system, which aims to improve livelihoods, promote sustainable development, protect the environment, and secure a better future for coming generations.
2. The standards system is comprised of AbTF's cotton standards family (CmiA, CmiA Organic, SCS); an assurance system; a monitoring, evaluation, and learning mechanism; training and capacity building of those involved in standards implementation; the CmiA Claims Framework; and Chain of Custody Guidelines.
3. The Assurance Manual document defines the main roles and responsibilities of the different organisational entities involved in the verification process of AbTF's cotton standards family. It describes the policies and procedures for an objective, independent, and credible verification system.
4. The Assurance Manual applies to and is to be followed when verifying the following standards of the Aid by Trade Foundation:
 - I The Cotton made in Africa (CmiA) standard
 - II The Cotton made in Africa Organic (CmiA Organic) standard
 - III The Sustainable Cotton Standard¹ (SCS)
5. For ease of reading, this manual generally refers to CmiA only; however, unless otherwise stated, all requirements outlined in this document also apply in full to CmiA Organic and SCS.

1.2. Associated Documents

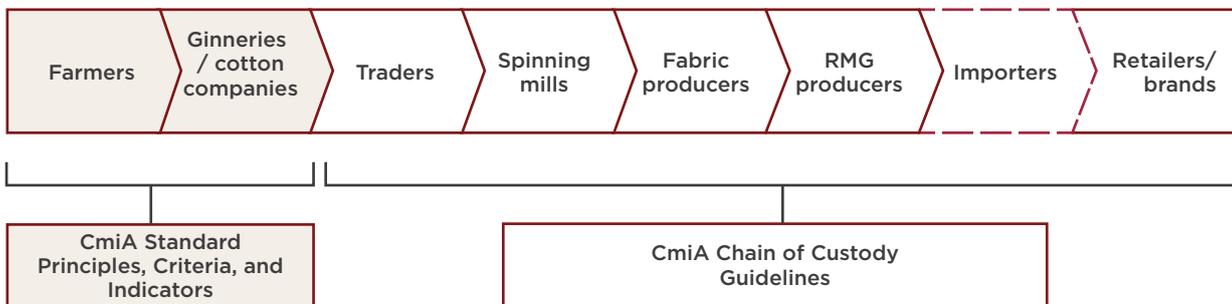
6. Documents associated with AbTF's standards system, including the CmiA Standard (Vol. 4), the Theory of Change, the Chain of Custody Guidelines, the Claims Framework, the CmiA Appeals Procedure, and more are available on the CmiA website at www.cottonmadeinafrica.org.

1 Currently not in use

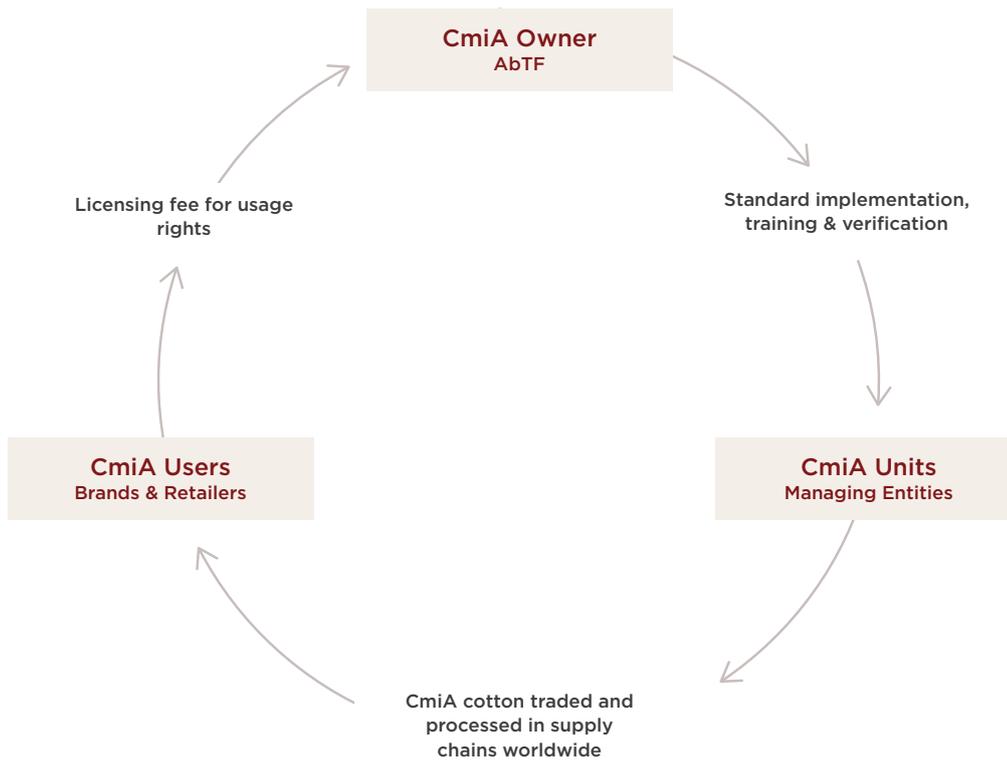
2. BACKGROUND

2.1. What is Cotton made in Africa (CmiA)?

7. Cotton made in Africa is an initiative of the Aid by Trade Foundation (AbTF) that was established in 2005. It comprises a family of three cotton standards, namely Cotton made in Africa (CmiA), Cotton made in Africa Organic (CmiA Organic), and the Sustainable Cotton Standard (SCS).
8. The trademark “Cotton made in Africa” (CmiA) is sold to buyers and consumers as a sustainability concept that aims to improve the livelihoods of African cotton farmers and to work towards more sustainable cotton production in African countries. The CmiA sustainability claim focusses on the supply and value chains in the participating African countries, i.e. on the growing and ginning of cotton; to this end, the standard provides the basis for uninterrupted traceability from farm to ginnery.
9. CmiA lint cotton is sold further downstream, with the Chain of Custody (CoC) Guidelines ensuring further uninterrupted traceability to spinning mills. Depending on the choice of brands or retailers, cotton verified under AbTF standards can be processed into garments in a Mass Balance (MB) or a Hard Identity Preserved (HIP) system.
10. The scope of the CmiA sustainability claim throughout the supply chain is illustrated here:



11. The CmiA claim is more thoroughly defined in the Principles, Criteria, and Indicators section of the CmiA standard, which covers the four pillars of cotton cultivation and ginning: Management, People, Planet, and Prosperity.
12. In general, the CmiA business model is based on the following three main work streams:
 - I Third-party verification of the CmiA standard, confirming the product’s sustainability claim and creating its unique selling proposition (USP).
 - II Marketing and sales: Brands and retailers pay a licensing fee and sell the product by marketing it through its USP.
 - III Targeted investments for continuous improvement, e.g. in agricultural qualification schemes or by improving the product, its USP, and the livelihoods of the cotton farmers, ginnery workers, their families, and their rural communities.



2.2. What is the scope of the CmiA standard?

13. The principles, criteria, and indicators outlined in the CmiA Standard focus on all main stakeholders in the CmiA cotton supply chain who are in direct contact with cotton seed, seed cotton, or lint cotton, e.g. farmers, ginneries, and cotton companies.
14. Other actors in the textile value chain, such as traders, spinners, and garment producers, are not part of CmiA's scope but are nevertheless subject to the Chain of Custody (CoC) Guidelines to be found at [CmiA-Chain-of-Custody-Guidelines.pdf](#) (cottonmadeinafrica.org).
15. The same is applicable for the CmiA Organic and SCS standards.

2.2.1. Scope of the CmiA Principles, Criteria, and Indicators

16. The CmiA standard comprises twelve principles, i.e. the overarching sustainability requirements, which are sorted along the four pillars of Management, People, Planet, and Prosperity. They represent AbTF's aspirational goals and expectations for Managing Entities and farmers:
 - I Management: These criteria and indicators are relevant for the internal management system.
 - II People: This pillar covers decent work and other social aspects relevant in cotton cultivation and ginning.
 - III Planet: This pillar covers environmental aspects such as protecting soil, water, biodiversity, the climate, and the environment.
 - IV Prosperity: These criteria and indicators are related to requirements that help improve productivity, fibre quality, and the overall living conditions of small-scale farmers and ginnery workers as well as of their families and local communities.
17. The principles are further elaborated on by criteria and associated Core or Improvement



Indicators. Criteria and indicators are formulated positively and describe the ideal state to strive for in order to give clear orientation to all parties involved.

- I Criteria provide a greater level of detail on the specific areas to be addressed within each principle.
 - II Indicators are measurable states that allow the assessment of whether or not associated criteria are met. These may change in tandem with society, technology, or cultivation and/or manufacturing practices.
 - III Core Indicators cover critical objectives for sustainable cotton cultivation and ginning which need to be met. All Core Indicators share equal status, validity, and authority.
 - IV Improvement indicators describe longer-term improvement goals.
18. Verification checks the degree to which the ideal state has already been achieved and, in the case of Core Indicators, whether no systemic non-conformities are observed.
 19. The CmiA Standard document is available at CmiA's website at www.cottonmadeinafrica.org. It is the foundation of all AbTF cotton standards, and specific requirements for CmiA Organic and for SCS are defined by additions or explanations regarding the non-applicability of criteria and indicators of the CmiA standard (see also chapter 8 on standard-specific additional clauses).





3. INTRODUCTION TO THE ASSURANCE SYSTEM

3.1. Why does CmiA need the assurance system?

20. The marketing objective of AbTF is to build credible trademarks such as “Cotton made in Africa” and “Cotton made in Africa Organic”. Verification represents an important means of gaining confidence on the expected credibility, which is needed to communicate the sustainability standards’ unique selling propositions (USP).
21. For verification to be credible, an assurance system is required to guarantee comparability and consistency as key elements of credibility and to identify a status quo as well as needs of improvement regarding the implementation of the standards’ principles and criteria.

3.2. Scope of the Assurance System

22. The main objectives of the Assurance System are to:
 - I verify that Managing Entities have met the Core Indicators of the CmiA standard before they receive a sales certificate to sell CmiA cotton;
 - II provide a framework to ensure that Managing Entities, once verified against the CmiA standards, continue to make progress towards fulfilling their Continuous-Improvement Plans;
 - III measure the sustainability performance of Managing Entities and overall impacts through the regular collection of data for both the field and ginnery levels; and
 - IV analyse verification results and identified improvement needs to provide adequate training and capacity building support by AbTF.
23. The CmiA standards are both performance-based (minimum level of fulfilment observed) and practice-based (continuous improvement of practices).
24. The Assurance System includes:
 - I Annual self-assessments for field-level activities and ginnery operations by the Managing Entity
 - II Regular external verifications of field and ginnery operations of the Managing Entity by independent third-party verifiers as external assurance providers²
 - III Random inspections of field and gin operations, either by the Assurance System owner (AbTF), external consultants, or independent third-party verifiers
25. Independent third-party verification at the field and ginnery levels is required to guarantee comparability and consistency as key elements of credibility and to identify a status quo as well as needs of improvement with regard to the requirements of the standards.
26. While verification is in the hands of verifiers from accredited external assurance providers, decision on the issuing of a sales certificate to a verified Managing Entity (CmiA Unit) is taken by AbTF, based on successful verifications at both the field and ginnery levels and provided that a mutually agreed Continuous-Improvement Plan (CIP) is put in place.
27. In addition, AbTF provides a complaints procedure to enable any party concerned, not just the verifiers, to report non-compliance with criteria and indicators or related dissatisfaction, thus contributing to compliance with each standard and ensuring credibility.

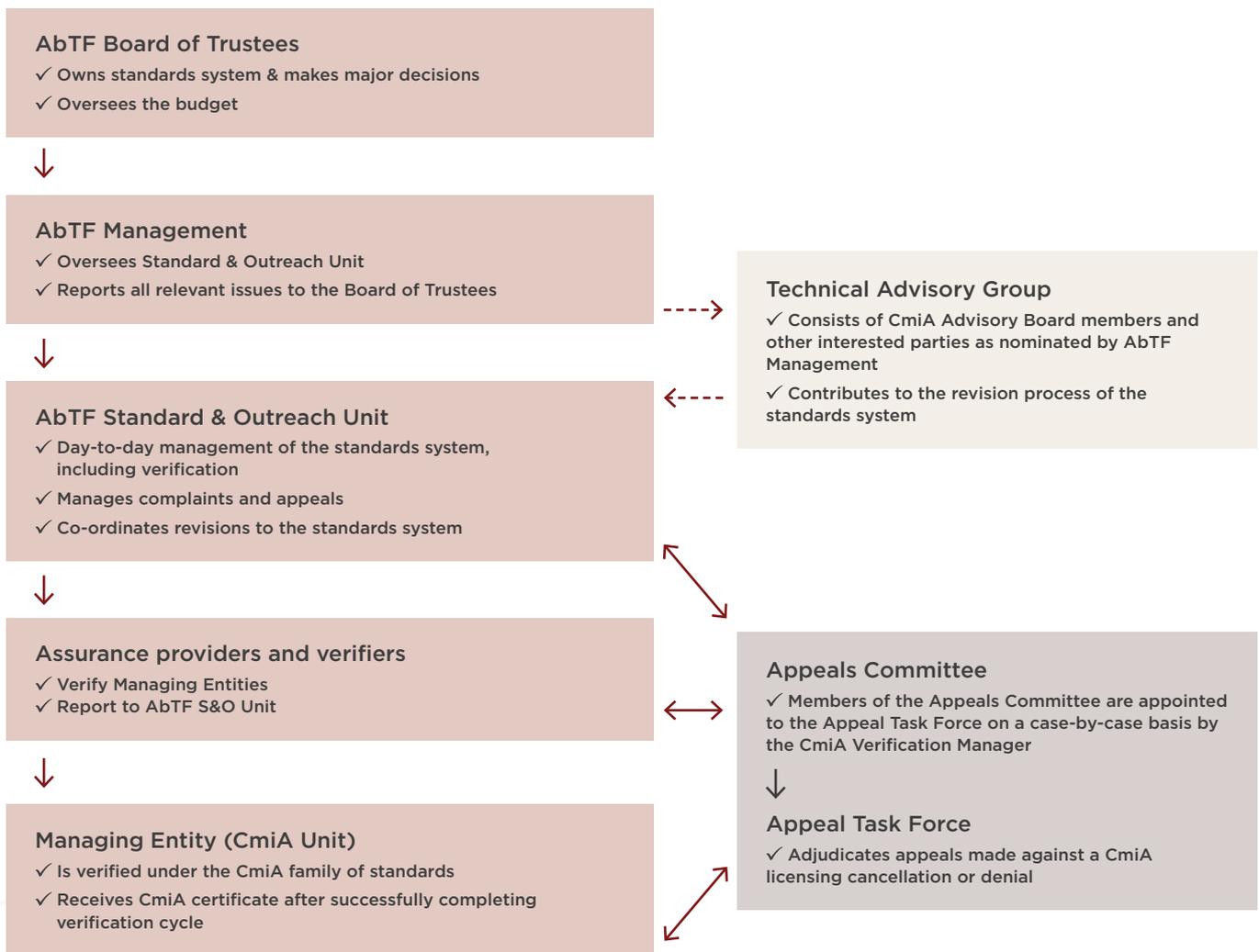
2 The term *assurance provider* is used in reference to ISEAL terminology.



4. KEY ROLES AND RESPONSIBILITIES

4.1. Overview of Key Roles and Responsibilities

28. The chart below shows the different actors in the standards system and specifically in the assurance process. A detailed description of their roles is given in the following paragraphs.





4.2. Aid by Trade Foundation Board of Trustees

29. The Aid by Trade Foundation Board of Trustees – in the following referred to as “AbTF Board” – consists of leading personalities from key non-governmental, governmental, and academic institutions as well as the private sector.
30. The AbTF Board:
- I is the highest decision-making body of the Aid by Trade Foundation;
 - II has ownership of the standards system;
 - III advises and oversees the AbTF Management; and
 - IV approves annual budgets for the implementation of the standards system.

4.3. Aid by Trade Foundation Management

31. The Aid by Trade Foundation Management team:
- I proposes amendments to the standards system and the benchmarking results to the AbTF Board of Trustees; and
 - II prepares the annual budget necessary to ensure an efficient and effective implementation of the standards system.

4.4. AbTF Standards & Outreach Unit / Verification Management

32. The Aid by Trade Standard & Outreach (S&O) Unit is responsible for the Verification Management team. It provides sufficient information to the Managing Entity to understand the requirements for obtaining and maintaining verified-partner status in the standards system, e.g. completing the self-assessment and fulfilling requirements pertaining to verification missions and continuous improvement, and makes obligations and potential benefits transparent to all interested parties.
33. The Verification Management team oversees the verification process for all verified Managing Entities as well as candidates, including triggering the completion and validation of the self-assessment.
34. The Verification Management team is responsible for identifying, contacting, and contracting the assurance provider and for assigning verifiers to schedule and undertake the verification within the required time.
35. The AbTF S&O Unit safeguards and controls the quality of verifiers by means of theoretical and practical training, validation of CAP³ Assurances, and random inspections of field-level and ginnery verifications (called “witness verifications”).
36. The Verification Management team ensures that verifiers are up to date with verification requirements, e.g. modifications on the content of the standard.

³ The CmiA Assurance Platform (CAP) is an online tool specifically designed by AbTF to capture the CmiA assurance process. It comprises all steps of an assurance, including the annual self-assessments of the Managing Entities and the verification findings of the verifiers. Access to the platform is provided by the Verification Management to both Managing Entities and assigned verifiers as needed.



37. The Verification Management team takes decisions on issuing, refusing, or cancelling a CmiA certificate (i.e. the licensing decision) after validation of self-assessments, CAP Assurances, and Continuous-Improvement Plans.
38. In addition, the Verification Management team manages appeals to licensing decisions as outlined in the CmiA Appeals Procedure and associated documents.
39. The AbTF S&O Unit aggregates information collected from CAP Assurances. Summary results and analyses are subsequently reported to the AbTF Management team and the Board of Trustees. An annual aggregated verification report is published after approval by the AbTF Management team.
40. The Verification Management team proposes improvements to the standards system, including the assurance scheme, considering analyses from verifications, recommendations of the Technical Advisory Group, and public consultations. These are presented to the AbTF Management and, in the event of significant changes, to the AbTF Board of Trustees.

4.5. Technical Advisory Group

41. Members of the CmiA Advisory Board are automatically members of the Technical Advisory Group. The CmiA Advisory Board consists of experts of all main stakeholder groups: NGOs, cotton companies, traders, retailers, and public organisations. The AbTF Management can nominate additional interested parties to join the Technical Advisory Group, for example experienced verifiers or consultants with relevant cotton expertise.
42. The main task of the Technical Advisory Group is to contribute to the regular revisions of the CmiA standard.
43. Changes and amendments to the CmiA standard recommended by the Technical Advisory Group will be taken into account in the revision process and, together with the results of a public consultation, will be incorporated into an updated version of the standard, which will then be submitted to the AbTF Management and Board of Trustees for approval.

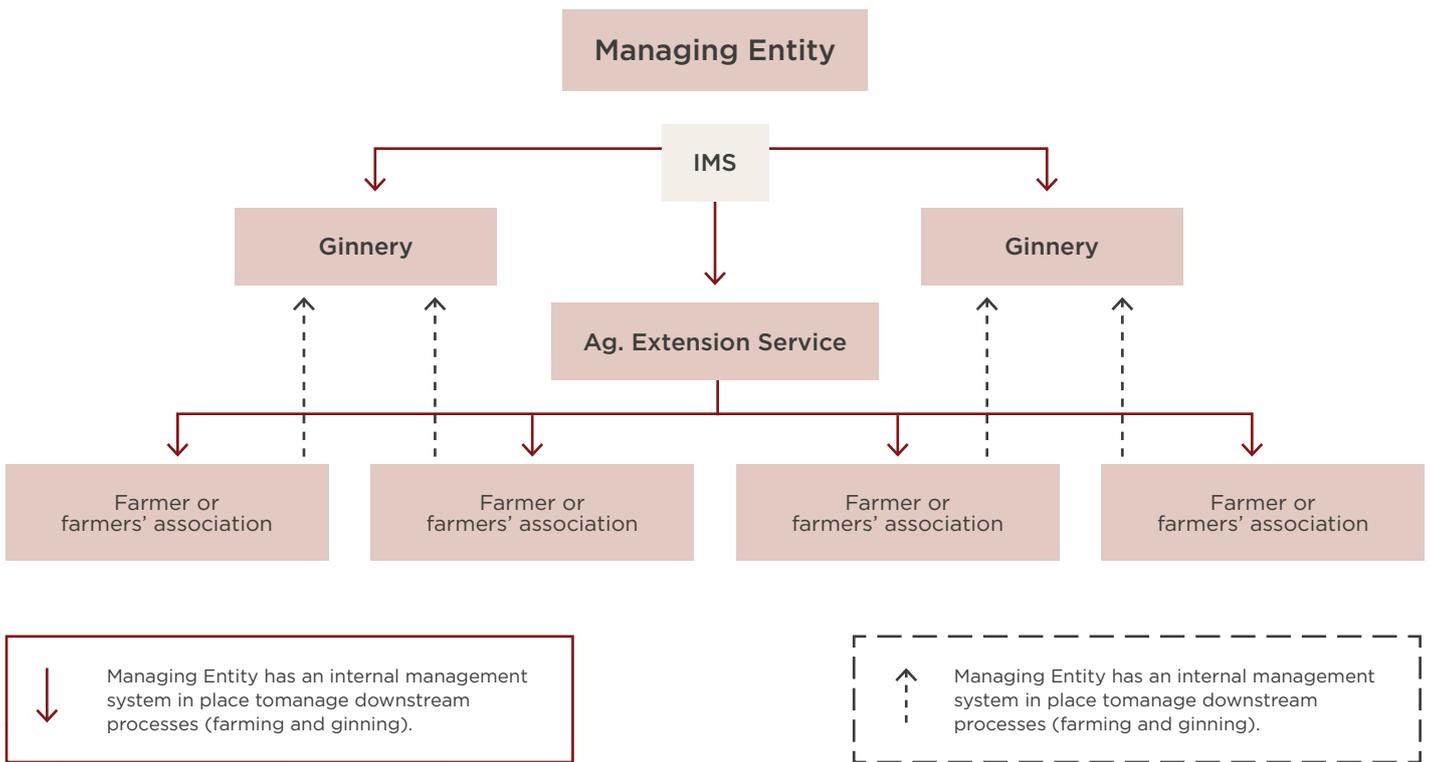
4.6. Assurance Provider and Verifiers

44. An independent third-party control body is commissioned to conduct the verification as the external assurance provider. This allows an independent review process with independent decisions and results.
45. The assurance provider assigns two qualified verifiers for each verification mission (see chapter 7 for qualification requirements).
46. The verifiers are responsible for verifying the overall results of the self-assessment of the Managing Entity (CmiA Unit), including on-site checks of the Managing Entity and CmiA-contracted farmers. Verification also involves collecting evidence on the number of farmers contracted by the Managing Entity, the hectares of CmiA cotton cultivated, the yields and the volume of seed and lint cotton, and other data presented via the CmiA Assurance Platform (CAP).

- 47. The verifiers are co-ordinated by the assurance provider contracted by AbTF, specifically the Verification Management.
- 48. The verifiers use a risk-based approach to decide on the sample selection for verification and submit their assessment through the CmiA Assurance Platform (CAP) to the Verification Management as well as to the Managing Entity. The verifiers are encouraged to contact local institutions for relevant information prior to or during a verification mission.
- 49. Verifiers are required to keep up to date with verification requirements through the mechanisms offered by the S&O Unit.

4.7. CmiA Unit and Managing Entity

- 50. Members of a CmiA Unit are all important participants relevant to the CmiA claim, thus implementing cotton cultivation and ginning in accordance with the principles, criteria, and indicators outlined in the CmiA standard. Usually, farmers, ginneries, and cotton companies are members of a CmiA Unit.





51. Compliance of a CmiA Unit is managed by the Managing Entity, which may be, inter alia, a cotton company, a ginnery or an institution within the cotton sector that has ability to exercise downstream management control. The Managing Entity is the first point of contact for the AbTF S&O Unit and for assigned verifiers.
52. The Managing Entity takes the ultimate decision on who will be a CmiA-contracted farmer. CmiA farmers can either be all individually contracted farmers or all from farmers' associations⁴ contracted by a ginnery or a cotton company. Alternatively, CmiA-contracted farmers can be farmers who have been specifically selected for participation in CmiA. All ginneries processing CmiA seed cotton, whether owned or sub-contracted, are automatically part of the CmiA Unit.
53. An up-to-date list of CmiA-contracted farmers needs to be made available to the verifiers.
54. The Managing Entity bears the responsibility for compliance with the CmiA standard. The Managing Entity commits to having management systems in place to ensure the compliance of members of the CmiA Unit.
55. The Managing Entity is responsible for the timely submission of the initial and subsequent self-assessments and for the completeness of all data points required by the CmiA Assurance Platform.
56. The Managing Entity ensures that required information and evidence are available to the verifiers. The Managing Entity also provides sufficient and appropriate assistance to the verifiers in order to ensure an efficient and effective verification. This includes in-kind contributions such as the provision of staff with local geographical knowledge and with transportation.
57. The Managing Entity develops and implements a Continuous-Improvement Plan (CIP) based on the results of each verification. The CIP is validated by AbTF's S&O Unit.
58. As the certificate holder, the Managing Entity receives a CmiA certificate after successfully completing a verification cycle (having successfully passed field-level and ginnery-level verifications).
59. The Managing Entity may appeal against a certificate issuing decision by the Verification Management following the CmiA Appeals Procedure, outlined in separate documents available on the [CmiA website](#).

4 Depending on how the cotton sector is structured in a given country, Managing Entities establish contracts with either individuals or farmers' groups.



5. ASSURANCE PROCEDURES

5.1. General Approach of Verification

60. The Assurance System covers the verification of cotton production at the field level (seed cotton) and at the level of cotton ginning (lint cotton). It enables AbTF to issue Managing Entities with CmiA certificates for selling lint cotton, which provides customers along the textile value chain—such as traders, spinning mills, garment manufacturers, importers, and brands or retailers—with the choice of following either the Mass Balance (MB) or the Hard Identity Preserved (HIP) system.
61. The Assurance System builds on three central elements:
- I **Self-assessment by the Managing Entity:** The Managing Entity has the obligation of providing an annual self-assessment of their operations, including data and information on associated farmers and on their performance regarding the CmiA criteria and indicators; this is submitted through the CmiA Assurance Platform.
 - II **Regular third-party verifications:** Self-assessments by the Managing Entity are verified by independent third-party verifiers every year, alternating annually between the field level and the ginnery level. It is obligatory for the verifiers to check compliance with the criteria and indicators relevant to the field level during the course of the growing season, i.e. between sowing and harvesting. Likewise, compliance with the criteria and indicators relevant to the ginnery level is checked during the ginning process, preferably when the ginneries are at full capacity, but in any case when the operation has at least been running long enough to have up-to-date documents for the verification of working conditions.
 - III **Continuous-Improvement Plan (CIP):** A main element of the standards is to stimulate and measure continuous improvements at the field and ginnery levels. To this end, the CIP lays out improvement objectives for the Managing Entity. The Continuous-Improvement Plan is developed by the Managing Entity to pursue improvement opportunities identified during third-party verification missions.

5.2. Verification Objectives and Methods

62. The general objectives of the verifications are to independently verify:
- I The accuracy of information provided in the self-assessment completed by the Managing Entity
 - II The degree to which the ideal state as formulated for each indicator has already been achieved, and in the case of Core Indicators, whether no systemic non-conformities are observed
 - III The effectiveness of the internal management and monitoring system of the Managing Entity
63. The verification requires the validation of the overall results reflected in the self-assessment by means of sufficient and appropriate corroborative evidence. This may or may not cause a change in the qualitative assessment of indicators. Any change in the rating will be based on the professional judgment of the verifiers.
64. The verifier should record the evidence used to verify compliance and use professional judgment for evaluation.



65. Compliance with CmiA, CmiA Organic, or SCS is verified at three levels:
- I Strategic level (management interview, document check at management level)
 - II Operational level (interviews with staff at ginneries, extension staff, and individual farmers or farmers' groups, document check at local level, on-site observations)
 - III Stakeholder level (interviews with concerned third parties)
66. Objective evidence of compliance stems from results of interviews with the Managing Entity's management and staff members as well as CmiA-contracted farmers and other stakeholders; from the review of written documents such as manuals, procedures, plans, or maps; from the physical inspection or testing of a piece of equipment or of a sample; from the assessment of an example of a particular operation, such as spraying or harvesting; and from the review of records such as written contracts, invoices, payslips, or bank statements.
67. AbTF seeks to promote systemic compliance with its sustainability standards rather than a checklist or inspection-day approach. For this reason, the standards' management system requirements are highly relevant. The Managing Entity needs to integrate the management requirements into its processes in order to achieve systemic compliance and continuous improvements. This approach implies that the burden of proof rests with the Managing Entity. Continuous improvement is measured over time via a qualitative assessment at the performance level for the indicators; this replaces the traffic light system found in earlier versions of the AbTF cotton standards.

5.3. The Verification Process

68. A CmiA verification cycle lasts two years. Within this verification cycle, two separate verification missions are conducted by independent third-party verifiers. Alternating from one year to the other, one verification mission takes place at the ginneries (ginnery level), and the other at the level of agricultural production (field level). Both verification missions focus on verifying the overall results of the annual self-assessment provided by the Managing Entity via CAP and the verification of the activities outlined in the Continuous-Improvement Plan.
69. **Phase 0: Candidatship for a CmiA Certificate.** If an actor in the cotton sector is interested in obtaining a CmiA certificate and becoming subject to cyclic CmiA verifications at the field and ginnery levels, the AbTF S&O Unit (Verification Management) provides information on the basic requirements, rights, and duties applicable to CmiA Managing Entities. To kick-start a verification cycle, the candidate must submit a completed self-assessment via the web-based CmiA Assurance Platform (CAP).
70. The AbTF S&O Unit (Verification Management) formally validates the self-assessment and registers the Managing Entity as a CmiA candidate. If the validation at AbTF indicates that an initial CmiA verification has good prospects for success, third-party verification missions are arranged. The Managing Entity receives the formal licence to sell CmiA cotton after having successfully completed third-party verifications at both the field and ginnery levels.
71. **Phase 1: Engagement of Verifiers.** The Verification Management establishes an annual verification plan and co-ordinates the specifics of verification missions with the respective Managing Entity and an accredited assurance provider, who then nominates qualified verifiers for the agreed verification mission.⁵
72. Verifications will be carried out by a team of two: one lead verifier and one assistant verifier. Some of the selection criteria for lead and assistant verifiers are their track records, their qualifications, including language skills, and their availability during the period required for the verification.

⁵ For the accreditation process and for qualification requirements for verifiers, please see section 7.



73. AbTF selects and contracts the accredited assurance provider for each verification mission. Payment rules for the missions are set out under the section entitled "Verification Fees".
74. The verifiers will inform the Managing Entity of the date and duration of the verification mission at least two weeks in advance. The Managing Entity has to ensure that key staff members are available for the entire verification mission.
75. In addition, the lead verifier sends a document request list to the Managing Entity, listing potential documents that should be available on-site. The Managing Entity is encouraged to upload relevant documents into the web-based CmiA Assurance Platform in order to allow the verifiers to prepare in advance and to get an overview of relevant management plans, procedures, training documentation, maps, etc.
76. **Phase 2: Preparation of the Verification Mission.** The Verification Management supports the verifiers in the preparation of the verification. At least two weeks prior to the verification mission, the verifiers get access to the completed annual self-assessment of the Managing Entity to be verified and, if applicable, the previous CAP Assurance as well as the previous Continuous-Improvement Plan (CIP) for the level to be verified (i.e. for the field or ginnery level).
77. The verifiers prepare the verification based on the formal review of the documents available beforehand, analysing the self-assessment, the previous CAP Assurance, and the previous CIP in order to identify open questions and possible hot spots and to get an overview of the structure, regions of operation, policies, procedures, and defined measures for the improvement of the Managing Entity.
78. If a self-assessment is not presented two weeks prior to the verification, or if the Managing Entity was not informed by the verifiers in time, the Verification Management may cancel the planned verification.
79. **Phase 3: On-Site Verification.** The verification mission consists of the following steps:
 - I Opening meeting and management interviews
 - II Document check
 - III Sampling
 - IV On-site checks
 - IIV Closing meeting, with discussion of findings
80. Once on site, the verifiers conduct the **opening meeting** with the management and the CmiA focal person of the Managing Entity and, if required, with other relevant stakeholders. The goal of the opening meeting is to inform about the objectives of the verification and to clarify open questions on the verification's proceedings. The opening meeting includes a clarification of roles and responsibilities (logistics), an overview of the proceedings and an agreement on the planned schedule (time and content), and an update on recent events, issues, and incidents related to or affecting the criteria and indicators of the CmiA standard.
81. At this point, the verifiers will have sufficient information to undertake the subsequent **management interview** with the Managing Entity. The interview may be opened with a brief description of the CmiA Unit and an overview of the underlying business model of the cotton sector at the local and national levels. The management interview also serves to gain a good understanding of the overall management of the CmiA requirements by the Managing Entity. The duration of the management interview depends on the size of the CmiA Unit as well as the level of complexity (e.g. regarding the number of farmers or the business model). During the management interview, the verifiers will become more comfortable with the management capacities and control mechanisms of the Managing Entity.
82. The management interview is followed by an on-site **document check**. In addition to records already presented via CAP, the verifiers examine documents to collect supporting evidence for



the interview results and to build a first opinion. This opinion should reflect the verifiers' level of comfort and helps the verifiers to structure subsequent verification work. If documents are not available, the Managing Entity should provide an appropriate explanation.

83. Normally, all the above-mentioned activities take place on day one of the site visit.
84. The goal of the **sampling** exercise is to gain the insight needed to achieve the verification objectives. In order to reach a sufficient level of comfort, a qualitative approach is applied to obtain samples suitable for gathering sufficient corroborative evidence. A representative sample is not gained through size but through a qualitative, top-down approach guided by interviews, document checks, and business model assessments. Sampling is therefore based on the degree of risk, on geographic criteria, or on samples for impact assessment, or it is simply done randomly. Finally, sampling is subject to the professional judgement of the assigned verifiers.
85. Recommended risk parameters include the number of farmers or farmers' groups contracted, the volume of cotton produced, and the evaluation results of the Managing Entity's internal management and monitoring systems and capacities. Other parameters are stakeholder information, current events, and recent incidents. By including field-level and ginnery-level checks in the verification, it becomes easier to assess the effectiveness of the Managing Entity's internal management and monitoring system.
86. When CmiA Organic is included, the verifiers have to consider sampling the Organic Unit (if the CmiA Unit has non-Organic components) in order for the CmiA Organic certification to be credible.
87. The Managing Entity is not entitled to determine which samples are taken or which sites are visited. Verifiers found to be taking instructions from the Managing Entity regarding the verification samples will be reprimanded and risk losing their right to verify.
88. **On-site checks:** From day two onwards, the field or ginnery checks are to be performed. The verifiers should obtain sufficient supporting evidence to confirm, amend, or change the Managing Entity's CAP Assurance.
89. The verifiers must continuously check whether reasonable comfort with the verification results has been achieved. Field and ginnery verifications are to be continued until the verifiers, in their professional judgement, have reached a sufficient level of comfort. For field-level verification, a minimum of five working days and a maximum of ten working days (including the opening and closing meetings) can be used as a guideline. For each ginnery, two working days (including the opening and closing meetings) may be assumed as a sufficient verification period.
90. On the closing of the last on-site day, a final meeting with the Managing Entity will take place to present and discuss the verification results—specifically the findings, observations, and risks as well as potential improvement opportunities—in order to arrive at a mutual understanding of the results. The results of the closing meeting are to be documented and form part of the CAP Assurance.
91. **Phase 4: Reporting.** Having concluded the verification of the management system and operational implementation of strategies and processes, the verifiers document the verification results. Reporting verification results requires an assessment of performance-level indicators as defined by the standards (including evidence, e.g. photos, of potential cases of non-compliance), as well as a summary overview of critical findings, risks identified, potential improvement opportunities, and progress made with regard to the Continuous-Improvement Plan.
92. The verifiers use the web-based CmiA Assurance Platform to document the verification results. The draft CAP Assurance is submitted to the Verification Management and the Managing Entity for comments and clarification.



93. The Managing Entity and the Verification Management have ten working days to comment on the draft CAP Assurance, including the qualitative assessment of the indicators. If the comments are submitted within these ten working days, the verifiers integrate any corrections, additional information, or constructive comments into the CAP Assurance. The final version is resubmitted, via CAP, to the Managing Entity and to the Verification Management. The Managing Entity has five working days to validate the final results through formal acceptance. If no response is made within five working days, the results are accepted by default. After finalisation, the verifiers confirm via the CAP Assurance the completion of the process.

5.4. Types of Verification

94. **Initial verification:** The initial verification is the first visit of verifiers to the Managing Entity. After the self-assessment is submitted via CAP and validated by the Verification Management, the first verification mission takes place as soon as possible. The initial verification consists of two separate missions at different periods of the cultivation cycle in order to ensure that verifiable activities are taking place; one verification mission is conducted at the field level, and another mission is conducted to verify ginnery-level criteria and indicators. The CmiA licence is granted after the successful completion of these two verification missions. The Managing Entity is responsible for all expenses for the initial verification.
95. **Regular verification:** After the initial verification, regular third-party verification missions take place. Regular verifications consist of two separate verification missions of equal weight. To ensure that the Managing Entity and the verifiers interact on an annual basis, AbTF alternates verifications at the field level (e.g. in even years) and the ginnery level (e.g. in odd years). The Aid by Trade Foundation will meet all expenses for regular verifications.
96. A **follow-up verification** may be necessary if the Managing Entity does not meet minimum requirements, e.g. systemic non-conformities for Core Indicators have been observed. A follow-up verification takes place after a gap-based action plan is developed and implemented by the Managing Entity to close the identified gaps. A follow-up verification exclusively focusses on systemic non-conformities with specific indicators. The Managing Entity will meet all expenses for the follow-up verification.
97. **Addendum verification:** The CmiA licence is valid until the end of the next regular verification cycle (2nd, 3rd, 4th, etc.) if there is no significant change with the Managing Entity with regard to its farmer base or to the number of ginneries in operation or in commission. If there are significant changes, the Verification Management can call for an addendum verification.
98. A relevant change occurs if the number of CmiA-contracted farmers increases by at least 25 percent compared to the previous season, or if there is a new ginnery to be integrated. The Aid by Trade Foundation will meet the expenses of the addendum verification.
99. **Random verification:** AbTF reserves the right to perform additional random verifications at its discretion. Random verifications are announced with a minimum notification time of 72 hours before the verification begins. Results of such random verifications will carry the same weight as an initial, regular, or follow-up verification. AbTF will meet the expenses for random verifications.
100. Failure to comply with a request for a random verification, for example by refusing verifiers access to information or contact with staff or with CmiA-contracted farmers of the Managing Entity, can lead to the cancellation of a CmiA certificate.



5.5. Verification Fees

101. Independent verifications are key to the reputation of the AbTF standards, the Aid by Trade Foundation as the owner of the standards system, and participating Managing Entities. Consequently, verifiers are not contracted by the individual Managing Entity but, directly and centrally, by the Verification Management. Hence, AbTF is in the position to adequately train and select assurance providers and (lead) verifiers from the respective assurance provider's pool of verifiers, ensure the rotation of the verifiers, allow verifiers to exercise their professional judgement, and ensure the quality of the verifications.
102. Consequently, verification fees, including travel and accommodation expenses, will be paid by the Aid by Trade Foundation after completion of the verification. Payment to the assurance provider is facilitated after the validation of the CAP Assurance by the Verification Management.
103. However, while AbTF co-ordinates initial verifications and any necessary follow-up verifications with the assurance providers, the costs for these verifications have to be covered by the Managing Entity.
104. For CmiA Organic, an authorised organic certification (e.g. EU, NOP, GOTS) must be organised and paid for independently by the Managing Entity. If the Managing Entity provides evidence of having sold CmiA Organic cotton to CmiA licensing partners, AbTF will partly reimburse costs for the organic certification costs. The exact reimbursement is individually agreed between AbTF and the Managing Entity and depends on the volume of CmiA Organic cotton sold.
105. Costs for the verification of CmiA Organic criteria will be fully covered by the Aid by Trade Foundation if the conditions of the relevant CmiA verification rules are met.





6. OBTAINING AND MAINTAINING A CmiA CERTIFICATE

6.1. Required Verification Outcomes

106. The Managing Entity needs to be in conformity the Core Indicators outlined in the CmiA standard, CmiA Organic standard, or SCS, as applicable.
107. Non-conformity with Core Indicators may be categorised into two different types (I) **incidental non-conformity** and (II) **systemic non-conformity**.
108. **Incidental non-conformities** with Core Indicators are present when:
- I the observed event is unintended, isolated, and limited in temporal and spatial scale; and
 - II the Managing Entity provides sufficient evidence that existing internal controls and mechanisms should prevent such practices.
109. If there is an incidental non-conformity with one or more Core Indicators, the Managing Entity has to implement immediate mechanisms in order to prevent the identified non-conformities from reoccurring.
110. A follow-up verification will be undertaken as soon as feasible in order to verify whether the measures taken by the Managing Entity sufficiently mitigate the risk of non-conformity with the identified Core Indicators.
111. The follow-up verification must take place within a period of twelve months after the regular verification. This period starts with the last day (closing meeting) of the regular verification during which the incidental non-conformity was discovered. The follow-up verification will focus on cases of identified non-conformities with Core Indicators.
112. If the follow-up verification confirms continued non-conformity with the Core Indicators under investigation, the non-conformity will be escalated to a systemic non-conformity, and the Managing Entity instantly loses its CmiA licence.
113. The Managing Entity can ask for further follow-up verifications. The second follow-up verification must take place within a period of twelve months. The CmiA licence can be reactivated in the event that this second follow-up verification provides sufficient evidence that all Core Indicators have been met and that sufficient controls are in place for the verifiers to be reasonably certain that the practices leading to non-conformity will be prevented in the future.
114. **Systemic non-conformities** with Core Indicators are present when:
- I corroborative evidence demonstrates that one or more Core Indicators are not met for certain practices; and
 - II the Managing Entity cannot provide sufficient evidence that internal controls and mechanisms are in place to prevent such practices.
115. If a systemic non-conformity is identified, the Managing Entity instantly loses its licence to sell CmiA cotton.
116. The Managing Entity can ask for a follow-up verification. If it provides sufficient evidence that all Core Indicators under investigation are met and that sufficient controls are in place so that



the verifiers are reasonably certain that practices leading to systemic non-conformities will be prevented in the future, the CmiA licence can be reinstated.

6.2. Continuous Improvement Mechanism to Maintain a CmiA Certificate

117. The concept of continuous improvement is reflected in the differentiation of Core and Improvement Indicators, and AbTF also provides a framework to ensure that Managing Entities, once verified, continue to make progress and receive adequate support in doing so. The verifiers are required to conduct a qualitative assessment of the performance of all Core and Improvement Indicators with the aim of identifying areas where further action is needed.
118. Having well-defined minimum requirements for the Core Indicators ensures that a consistent baseline for sustainable cotton production is achieved across all verified Managing Entities. Regardless of the initial level of a Managing Entity, the focus on continuous improvement ensures that every CmiA Unit adopts more sustainable practices over time.
119. While Managing Entities do not need to prove conformity with Improvement Indicators in order to receive their first CmiA certificate, their performance levels are assessed in each verification cycle. Managing Entities are required to improve their overall performance level with every re-verification.
120. Based on the assessment results of the verification, the Managing Entity is required to improve its sustainability performance over time in order to maintain its CmiA certificate. Set targets, including timelines, and assigned responsibilities within a Managing Entity are documented in the Continuous-Improvement Plan (CIP). A check on the implementation status of the defined activities of the CIP is subject to regular verifications.
121. If there is no improvement, or if there is a change for the worse, the CmiA certificate may not be issued, and the Managing Entity is to consult with the S&O Unit of the Aid by Trade Foundation.
122. If all Core and Improvement Indicators are performed at a very good or even ideal level, this level of performance should be maintained by the Managing Entity.

6.3. Issuing of a CmiA Certificate

123. A certificate attesting to conformity with the CmiA standard is issued by the Aid by Trade Foundation. It allows the Managing Entity to sell CmiA cotton under the “CmiA” label and is valid for two years. The same procedure also applies to the other AbTF cotton standards. The CmiA website provides an up-to-date list of all Managing Entities that currently hold certificates: <https://cottonmadeinafrica.org/en/for-cotton-traders/>
124. AbTF will issue the certificate once the verifiers have confirmed the successful completion of the two verification missions at both the field and ginnery levels, and the final CAP assessments, including the Managing Entity’s Continuous-Improvement Plans for the field and ginnery levels, are available to and accepted by AbTF and the Managing Entity.



6.4. Cancellation of a CmiA Certificate

125. AbTF can revoke CmiA certificates due to administrative reasons or in the event that the Managing Entity does not comply with one or more of the following requirements:
- I Submitting a complete and correct self-assessment on an annual basis and in a timely manner
 - II Ensuring an effective verification process (e.g. the Managing Entity does not refuse access)
 - III Creating a Continuous-Improvement Plan after each verification mission
 - IV Ensuring that no systemic non-conformities with CmiA Core Indicators are found during verification
126. A Managing Entity with a cancelled CmiA certificate is not permitted to sell cotton as CmiA cotton during the cancellation period. However, the Managing Entity can continue participating in the CmiA initiative, with farmers receiving training and support from the Managing Entity.
127. A Managing Entity with a cancelled CmiA certificate can apply for a new verification cycle, which will follow the verification procedures outlined under chapter 5 of this document. AbTF reserves the right to deny such an application for good cause, e.g. if false information has been intentionally submitted in the self-assessment.
128. Certificates can also be cancelled if there is a change in the status of a Managing Entity, e.g. if the Managing Entity stops growing or ginning cotton.





7. ACCREDITATION AND QUALIFICATION OF ASSURANCE PROVIDERS AND VERIFIERS

7.1. Accreditation of Assurance Providers

129. As the standards system owner, AbTF is the sole body entitled to accredit assurance providers and individual verifiers. Through accreditation, AbTF ensures the competence of **assurance providers** as external control bodies regarding AbTF's cotton standards and their ability to verify Managing Entities for compliance with these standards.
130. An assurance provider conducting verifications for AbTF's cotton standards is required to have an active registration under ISO 17065 or ISO 19011.
131. An assurance provider needs to have at least three years of experience in verifying/auditing/certifying social and/or environmental sustainability standards.
132. An assurance provider needs to have conducted a minimum of ten social and/or environmental verifications/audits/certifications during the past three years.
133. AbTF provides transparent access to the pool of accredited assurance providers and keeps records of each verifier's CmiA verification missions.
134. Assurance providers and verifiers are required to participate, at their own expense, in regular and extraordinary qualification measures conducted by AbTF or by organisations/persons expressly authorised by AbTF, including regular refresher training programmes. The objective of the training is to ensure a full understanding of the cotton standards' requirements and to integrate lessons learnt by verifiers into AbTF's assurance system.
135. Assurance providers are required to disclose to AbTF any material change since accreditation that may affect their independence or the qualifications required by AbTF.

7.2. Required Qualifications and Competencies of Verifiers

136. To a large degree, social and environmental verifications rely on the capacities of assurance providers and the competence and skills of their individual verifiers. Prerequisites for individual **verifiers** to participate in qualification measures and CmiA verifications are:
 - I Employment with an ISO-accredited assurance provider
 - II Documented experience in verifying social and/or environmental standards
 - III Documented technical know-how
 - IV Documented formal higher education
 - V Relevant language skills
137. To safeguard and maintain the high quality of the CmiA assurance system, verifiers are required to participate in regular and, if applicable, extraordinary training exercises implemented by the Verification Management and/or delegated trainers.
138. After successfully participating in AbTF's verifier training, approved verifiers should preferably work in mixed teams (female/male).



139. Previous documented and satisfactory CmiA verifications may qualify as proof of the qualifications of individual verifiers.
140. If a combined organic certification and CmiA Organic verification is planned, the lead verifier is required to hold, at minimum, a valid qualification/accreditation from the respective organic scheme.
141. To be approved for CmiA verification, the verifier needs to demonstrate the following qualifications and competencies:
- I University degree in agriculture, natural resources, environmental management, or another relevant subject; this is encouraged but not required, as experience may be substituted for education
 - II Training in auditing principles, procedures, techniques, and behaviours
 - III Auditing or other work experience in (cotton) farming, pedology, ecology, natural resources, or environmental management
 - IV Knowledge of the relevant national and local laws and regulations governing areas such as the environment, labour, health, and safety in the country where the verification mission takes place
 - V The application of appropriate verification principles, procedures, and techniques to the planning and execution of the third-party verification so that the missions are conducted in a consistent, systematic, impartial, and objective manner
 - VI Visual observations and inspections of cotton farms, cotton fields, and ginneries to detect non-conformities with the CmiA standard
 - VII Quality control of collected information by verifying its accuracy, providing significant and appropriate evidence to support the findings and conclusions of the third-party verification, and submitting well-documented CAP Assurances
 - VIII Oral and written language skills in English or French (depending on the country of verification)
 - IX Computer knowledge
 - X Documentation of successful participation in theory-based verifier training regarding the CmiA standards system, including regular refresher training
 - XI Documentation of successful participation in practical auditor training and/or co-auditing of the CmiA standard
142. In addition to the above mentioned, lead verifiers need to successfully complete a minimum of two verification missions acting as a co-verifier under the direction and guidance of a recognised lead verifier and successfully complete one verification mission as lead verifier under the direction and guidance of a recognised lead verifier.

7.3. Continuous Quality Control

143. Verifiers need to disclose any potential conflict of interest to the Verification Management prior to their assignment.
144. Periodic reviews of verifiers' performance will be undertaken by AbTF, covering feedback on the quality of both the CAP Assurances submitted and the verification missions carried out on site.
145. Unannounced or announced witness verifications are a means for the Verification Management to assess the quality of verifications and to support the learning process of the assurance system. A witness verification is a visit by AbTF or by designated external consultants. These visits are conducted during a verification mission with the aim of observing how the verifiers perform the different verification procedures (e.g. through document review, visual inspections of fields or ginneries, or interviews with management, staff, and farmers).



146. Written feedback will be provided to the verifiers by AbTF after each witness verification visit and may include the instruction to solve specific issues that have been identified. AbTF may observe a verifier as often as necessary to ensure that identified issues are solved and may request documentation from the verifier proving that an identified issue has been resolved.

7.4. Assignment of Assurance Providers and Verifiers

147. AbTF decides on the assurance provider to be assigned for the verification of each Managing Entity and approves the lead verifier assigned by the assurance provider for each individual verification mission.
148. Criteria taken into account include a rotation of assurance providers and verifiers, the efficient planning of verification missions, and cost effectiveness. Ideally, the same verifier does not conduct two successive verification cycles with the same Managing Entity. Regarding efficiency and effectiveness, several missions in the same country or region are combined whenever possible.

7.5. Complaints, Sanctions, and Withdrawal of Accreditation

149. In case of complaints regarding the conduct or the performance of the third-party verifiers, Managing Entities have the option of initiating the appeals procedure if they believe a sales certificate has been incorrectly refused due to a failed verification. There is also the AbTF complaints procedure, which can be activated by other AbTF partners and stakeholders formally involved in CmiA to address concerns about verifiers.
150. AbTF reserves the right to place assurance providers and individual verifiers on probation or to terminate accreditation based on one or more of the following criteria:
- I Persistent poor quality of CAP Assurances
 - II Persistent delays in submitting CAP Assurances to AbTF
 - III Poor quality of on-site verifications or unprofessional or inappropriate conduct, as assessed by AbTF or by designated external consultants during witness verifications or based on feedback from Managing Entities
 - IV Negative status of business or contractual relationship with AbTF
151. Whenever AbTF decides to place an assurance provider on probation or to terminate the relationship, a formal communication will be sent by AbTF to the assurance provider, informing the provider of the decision and the reason in order to allow for an opportunity to respond within a defined timeline. For an assurance provider placed on probation, the organisation will need to provide a corrective action plan with details of the actions to be taken and a schedule for each action. AbTF will decide whether the plan is approved or not. In the event that the plan is not approved or that the implementation of an approved plan fails to meet targets or schedules, AbTF reserves the right to terminate the relationship with the assurance provider. No further verification missions will be assigned to assurance providers on probation until the corrective action plan has been successfully implemented.
152. If AbTF terminates its relationship with an assurance provider, the assurance provider's name will be removed from the CmiA website.



8. STANDARD-SPECIFIC ADDITIONAL CLAUSES

8.1. CmiA Organic

153. In essence, CmiA Organic is a dual certification that combines the CmiA standard with a recognised organic certification. A few individual indicators of the CmiA standard are not applicable in the case of organic cultivation. These do not have to be checked in the CmiA verification. More detailed information is presented in a separate document (CmiA Organic - Complementary Requirements to CmiA Vol. 4).
154. At the field level, the Managing Entity has to undergo an organic certification under the IFOAM Family of Standards (such as EC 834/2007, NOP). It is also advisable, but not mandatory, to have the ginneries additionally certified according to the Global Organic Textile Standard (GOTS).
155. A Managing Entity can produce either only CmiA Organic cotton or both CmiA Organic and other CmiA cotton.
156. The geographical and organisational scopes need to be clearly defined and sufficiently well documented for the verifiers to be able to verify the CmiA Organic Unit.
157. There is no limitation with regard to the number of farmers who convert to organic production. However, the Managing Entity needs to define its conversion strategy and how to structure the CmiA Organic Unit (e.g. organic farmers' groups or organic regions).
158. Failing the CmiA verification will result in the loss of the CmiA Organic licence. However, the validity of the organic certificate itself will remain unaffected.
159. Failing the organic certification will cause the loss of the licence to sell CmiA Organic lint. However, the standard CmiA certificate will not be affected.
160. CmiA Organic verifications are managed the same way as standard CmiA verifications. AbTF pays for the verification.
161. All policies and procedures in this document are also applicable to and binding on a CmiA Organic Managing Entity.

8.2. Sustainable Cotton Standard (SCS)

162. The Sustainable Cotton Standard (SCS) has been developed as a GMO-neutral standard that is marketed at the business-to-business (B2B) level.
163. All formal and procedural rules and regulations that are detailed in the CmiA Assurance Manual and that apply to the CmiA verification will, with the above-mentioned limitations (B2B only) and the exemption of the CmiA Core Indicator 8.1.1., apply in full to the Sustainable Cotton Standard (SCS). When verifying SCS, the verifiers will follow information presented in a separate document (SCS - Complementary Requirements to CmiA Vol. 4⁶).

6 SCS is not currently in use; this document will only be created and published if required.



GLOSSARY

Appeal	Request by the Managing Entity to AbTF for reconsideration of its assessment decision
Assessment	The combined processes of third-party verification, review, and decision regarding a Managing Entity's conformance with the requirements of a cotton standard of the Aid by Trade Foundation
Assurance	Demonstrable evidence that specified requirements relating to an AbTF cotton standard are fulfilled (adapted from ISO 17000)
Assurance provider	Body responsible for performing the assessment of Managing Entities (synonymous to control body or third-party verifying company)
CAP Assurance	The completed process that verifiers conduct and document in the CmiA Assurance Platform (CAP): Check of the general information provided by the Managing Entity (ME), assessment of the ME's performance levels for the criteria and indicators during a verification, verification report writing, and upload of proof of findings (e.g. photos)
Certificate	A statement that fulfilment of specified requirements for a cotton standard of the Aid by Trade Foundation has been demonstrated, thereby issuing a licence to sell lint cotton as verified (CmiA, CmiA Organic, or SCS)
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 Managing Entity does not meet this indicator at a satisfactory level, i.e. a systemic non-conformity is observed, it cannot receive a CmiA certificate
Improvement Indicator	A CmiA indicator that indicates Managing Entities' performance with regard to sustainability beyond the level of the Core Indicators
Managing Entity	The entity that is seeking assurance of its conformance with the requirements of an AbTF cotton standard. A Managing Entity may, inter alia, be a cotton company, a ginnery, or an institution within the cotton sector that has the ability to exercise downstream management control and transparency regarding inputs and outputs of cotton production
Self-assessment	A 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 numbers of farmers, crop yields, or completed training) and a detailed self-evaluation regarding the criteria and indicators of the CmiA standard



Standards system	Collectively, the organisations responsible for the activities involved in the implementation of a standard, including standard setting, capacity building, assurance, labelling, and monitoring (adapted from ISEAL)
Standards system owner	The organisation, in this case AbTF, that is responsible for the standards system and accountable for the performance of its assurance system. The standards system owner determines the objectives and scope of the standards system as well as the rules for how the scheme will operate and the standards against which conformance will be assessed
Verification / Third-party verification	Confirmation, through the provision of objective evidence, that specific requirements have been fulfilled (adapted from ISO 9000)
Verification mission	Verification assignment including preparation, on-site collection of evidence (verification visit) and reporting
Verification visit	On-site presence of verifiers to collect evidence on conformity with the standards, including the opening meeting, interviews with the management and other relevant stakeholders, document checks, an on-site crosscheck at the field and ginnery levels, a summary of the verification results, and the close-out meeting
Verifier	The person who performs the verification
Verifying company	An independent, ISO-accredited, third-party company conducting verifications against AbTF cotton standards (synonymous to assurance provider)



AID BY TRADE FOUNDATION

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

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

Aid by Trade Foundation

Gurlittstraße 14 · 20099 Hamburg

Telefon: +49 40 25 76 75 50

E-Mail: info@abt-foundation.org

www.cottonmadeinafrica.org

