



Assurance Manual

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

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Document History

The Assurance Manual builds on the previous CmiA Verification Governance.

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PwC	Verification of the Governance's consistence	1.12.2008	v4
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PwC	Remarks of the AbTF	25.01.2009	v6
PwC/AbTF	Amendments of consequences regarding incidental non-compliance	01.02.2011	v7
AbTF/SSO	CmiA Organic and SCS governance added	31.08.2013	v8
AbTF	Results of "Technical Advisory Board on Verification" meeting on 23.10.2013 General Review of Verification Documents	05.12.2013	v9



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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 the 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 the standard 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 within the scope of verification 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 text, most times this manual refers to CmiA only, however all requirements outlined in this document also apply in full to CmiA Organic and SCS, unless otherwise stated.

1.2. Associated Documents

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

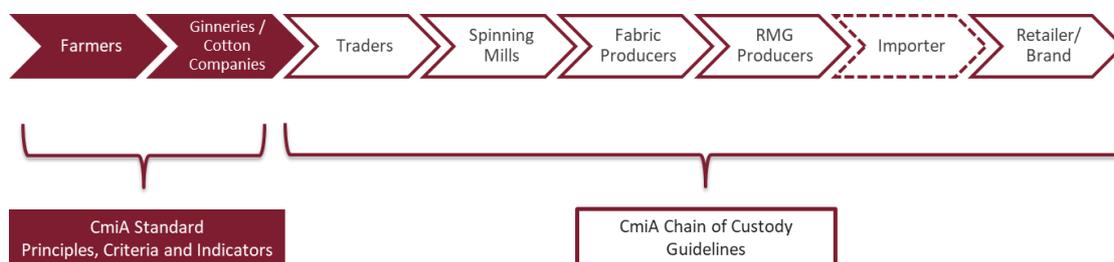
¹ Currently not in use



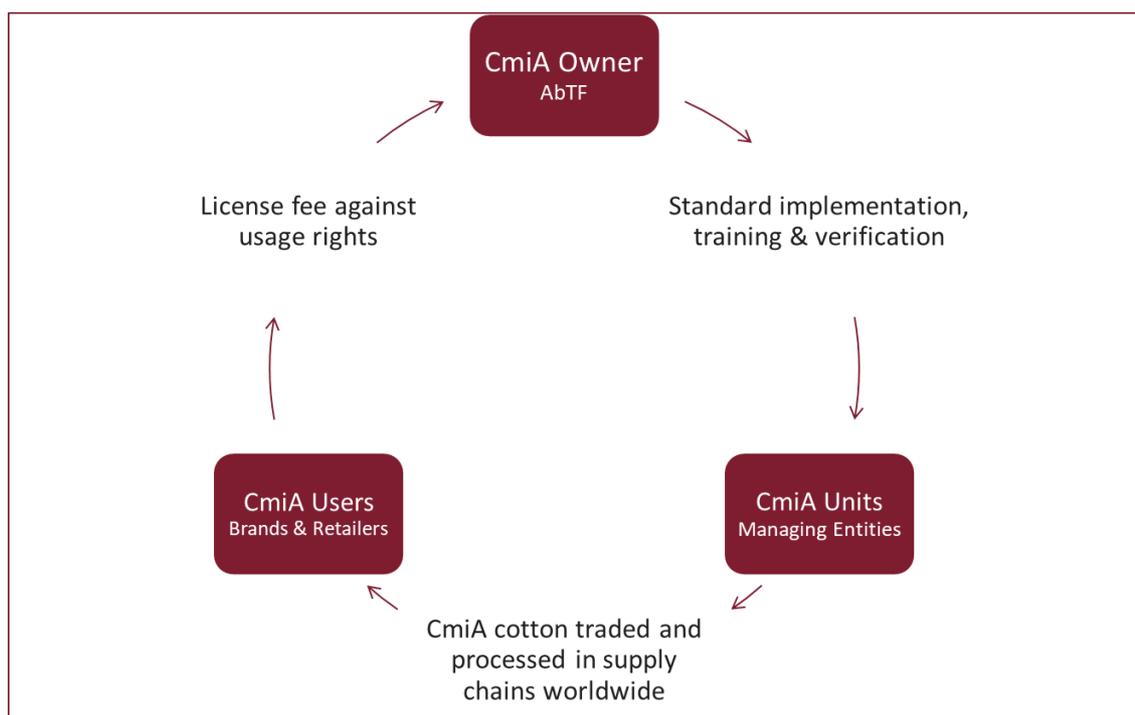
2. Background

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 of 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 with the aim to improve the livelihoods of African cotton farmers and to work for more sustainable cotton production in African countries. The CmiA sustainability claim focuses on the supply and value chain in the participating African countries, i.e., the growing and ginning of cotton, and thus the standard provides the basis for uninterrupted traceability from farm to ginnery.
9. CmiA lint cotton is sold further downstream, with Chain of Custody (CoC) Guidelines ensuring further uninterrupted traceability to spinning mills. Depending on the choice of brands or retailers, cotton verified under the standards of the AbTF can be processed to 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 through Principles, Criteria and Indicators which cover the four pillars Management, People, Planet, and Prosperity for the cultivation of cotton and its ginning.
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 & Sales: Brands and Retailers pay a license fee and sell the product via communication of its USP
 - iii. Targeted investments for continuous improvement, e.g. in agricultural qualification schemes, improving the product, its USP and the livelihood of the cotton farmers, ginnery workers, their families, and their rural communities.



2.2. What is the scope of the CmiA Standard?

11. The Principles, Criteria and Indicators outlined in the CmiA Standard focus on all main actors of the CmiA cotton supply chain who are in direct contact with cotton seed, seed cotton and lint cotton, i.e., farmers, ginneries, and cotton companies.
12. Other actors in the textile value chain, such as traders, spinners, 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 \(cottonmadeinafrica.org\)](https://cottonmadeinafrica.org/CmiA-Chain-of-Custody-Guidelines.pdf).
13. The same is applicable for the CmiA Organic and SCS standards.

2.2.1. Scope of the CmiA Principles, Criteria and Indicators

14. The CmiA Standard comprises 12 principles, i.e. the overarching sustainability requirements, which are sorted along the four pillars of Management, People, Planet and Prosperity. They represent the aspirational goals and expectations that AbTF has regarding 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 overall living conditions of small-scale farmers and ginnery workers, as well as their families and local communities.



15. The principles are further elaborated 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 line with changes in 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.
16. 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.
17. The CmiA Standard document is available at CmiA's website www.cottonmadeinafrica.org. It is the foundation of all AbTF cotton standards, and CmiA Organic as well as SCS specific requirements are defined by additions or explanations on 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 an Assurance System?

18. 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 to gain confidence on the expected credibility, which is needed to communicate the sustainability standards' unique selling proposition (USP).
19. For a credible verification an assurance system is required to guarantee comparability and consistency as key elements of credibility, 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

20. 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 against their continuous improvement plans.
 - iii. Measure the sustainability performance of Managing Entities, and overall impacts, through regular collection of data for both field and ginnery levels.



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- iv. Analyse verification results and identified improvement needs to provide adequate training and capacity building support by AbTF.
 21. The CmiA standards are both performance-based (minimum level of fulfilment observed) and practice-based (continuous improvement of practices).
 22. 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, and
 - iii. Random inspections of field and gin operations, either by the Assurance System owner, respectively AbTF, external consultants or by independent third-party verifiers.
 23. Independent third-party verification at field level and at ginnery level is required to guarantee comparability and consistency as key elements of credibility, to identify a status quo as well as needs of improvement with regards to the standard requirements.
 24. While verification is in the hands of the verifiers from accredited external assurance providers, decision on the issuing of a sales certificate for a verified Managing Entity (CmiA Unit) is taken by AbTF, based on successful verification both at field level and at ginnery level, and with provision of a mutually agreed Continuous-Improvement Plan (CIP).
 25. In addition, AbTF provides a complaints procedure to enable any party concerned beyond verifiers to point out non-compliance with criteria and indicators or related dissatisfaction, thus contributing to compliance with each standard and ensuring credibility.

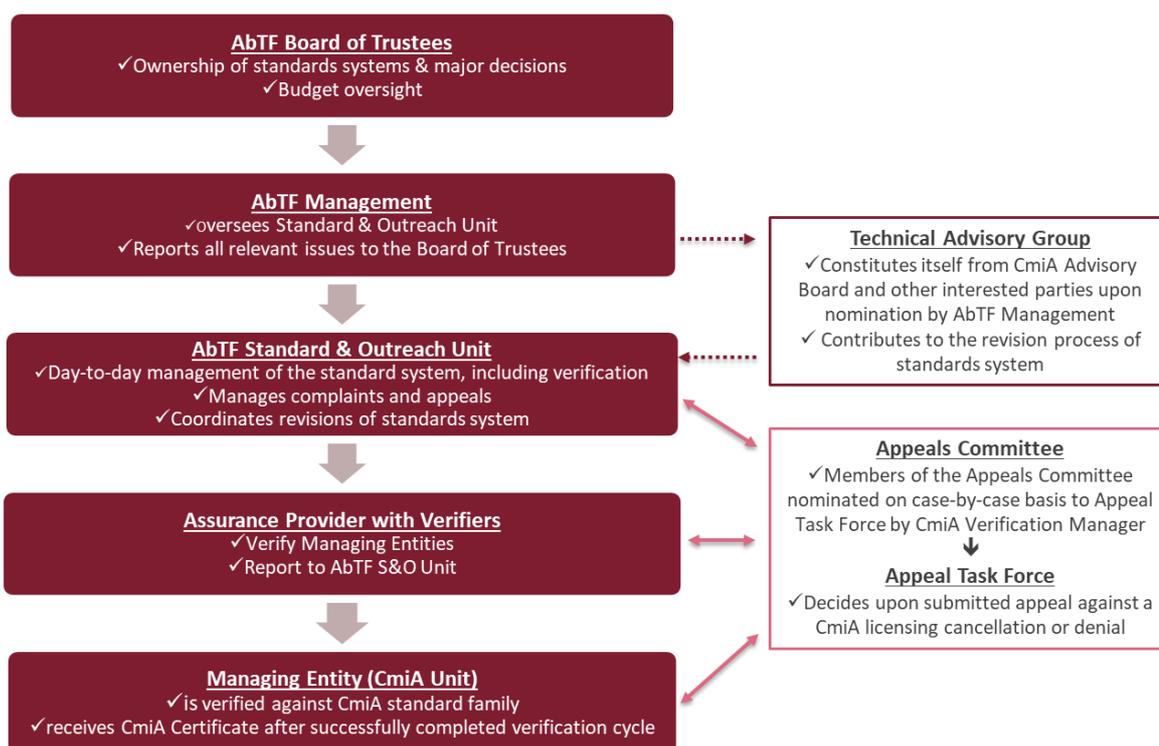
² The term assurance provider is used in reference to ISEAL terminology.



4. Key Roles and Responsibilities

4.1. Overview of Key Roles and Responsibilities

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



4.2. Aid by Trade Foundation Board of Trustees

27. 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 private sector.

28. 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.
- iv. approves annual budgets for the standards system execution.

4.3. Aid by Trade Foundation Management

29. The Aid by Trade Foundation Management:

- i. proposes amendments to the standards system, as well as benchmarking results to the AbTF Board of Trustees.



- ii. prepares the annual budget necessary to ensure an efficient and effective execution of the standards system.

4.4. AbTF Standard & Outreach Unit / Verification Management

30. The Aid by Trade Standard & Outreach (S&O) Unit is responsible for the verification management. It provides sufficient information to the Managing Entity to understand the requirements for entering and continue being a verified partner of the standards system, i.e. completion of the self-assessment, requirements with regard to verification missions and continuous-improvement requirements, and makes obligations and potential benefits transparent to all interested parties.
31. The verification management oversees the verification process for all verified Managing Entities as well as candidates, including triggering the self-assessment completion and its validation.
32. The verification management is responsible for identifying, contacting, and contracting of the assurance provider with allocated verifiers to schedule and undertake the verification with the required time.
33. 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 (so-called witness verifications).
34. The verification management ensures verifiers are up-to-date with verification requirements, e.g. modifications on content of the standard.
35. The verification management takes the decision on issuing, refusal, or cancellation of a CmiA certificate (licensing decision) after validation of self-assessments, CAP Assurances and continuous-improvement plans.
36. In addition, the verification management manages the appeals to licensing decisions as outlined in the CmiA Appeals Procedure and associated documents.
37. The AbTF S&O Unit aggregates information collected from CAP Assurances. Summary results and analysis are subsequently reported to the AbTF Management and the Board of Trustees. An annual aggregated verification report is published after approval by AbTF Management.
38. The AbTF verification management proposes improvements to the standards system, including the assurance scheme, considering analysis 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.

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 AbTF verification management to both Managing Entities and assigned verifiers as needed.



4.5. Technical Advisory Group

39. 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.
40. The main task of the Technical Advisory Group is to contribute to the regular revisions of the CmiA standard.
41. 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 standard version, which will then be submitted to the AbTF Management and Board of Trustees for approval.

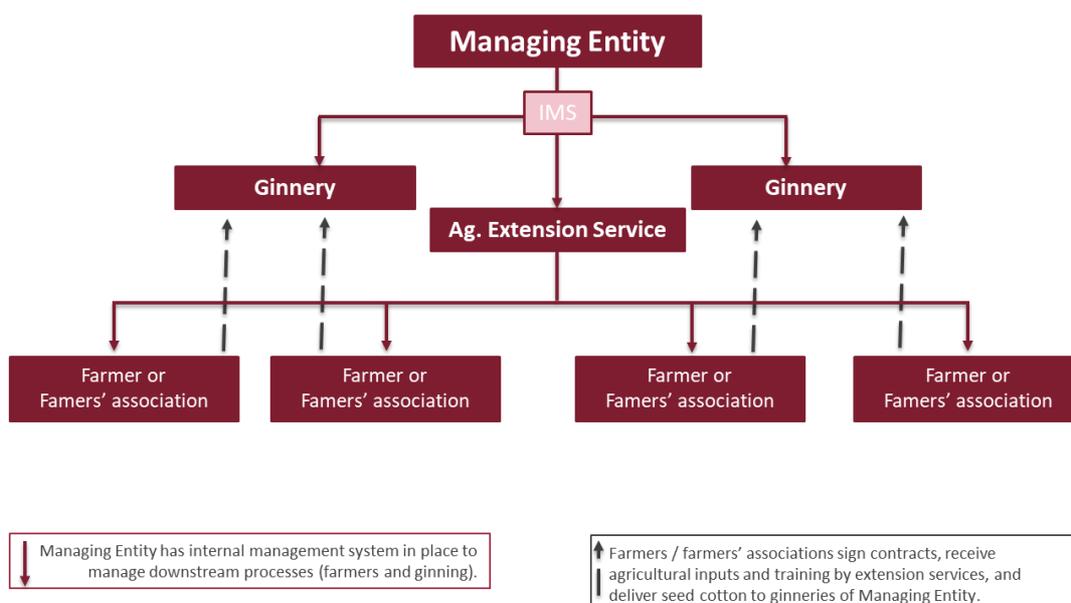
4.6. Assurance Provider and Verifiers

42. An independent third-party control body is commissioned with the verification as external assurance provider. This allows an independent review process with independent decisions and results.
43. The assurance provider assigns two qualified verifiers for each verification mission (cf. chapter 7 for qualification requirements).
44. The verifiers are responsible to verify 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 covers evidence on the number of farmers contracted by the Managing Entity, hectares of CmiA cotton cultivated, yields, and volume of seed and lint cotton, and other data presented via the CmiA Assurance Platform (CAP).
45. The verifiers are coordinated via the assurance provider who is contracted by the AbTF, specifically the verification management.
46. The verifiers decide on the sample selection for verification, based on a risk-based approach, and submit their assessment through the CmiA Assurance Platform (CAP) to AbTF's verification management as well as to the Managing Entity. The verifiers are encouraged to contact local institutions for relevant information prior or during a verification mission.
47. 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

48. Members of a CmiA Unit are all important participants relevant to the CmiA claim, thus implementing cotton cultivation and ginning along the Principles, Criteria and Indicators outlined in the CmiA Standard. Usually, farmers, ginneries, and cotton companies are members of a CmiA Unit.



49. 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.
50. The Managing Entity takes the ultimate decision who will be a CmiA-contracted farmer. CmiA farmers can either be all individually contracted farmers or all contracted farmers’ associations⁴ by a ginnery or a cotton company. Or, CmiA-contracted farmers can be farmers who are specifically identified to participate in CmiA. All ginneries, whether owned or sub-contracted, processing CmiA seed cotton are automatically part of the CmiA Unit.
51. An up-to-date list of CmiA-contracted farmers needs to be made available to the verifiers.
52. The Managing Entity bears the responsibility for compliance with the CmiA Standard. The Managing Entity commits to have management systems in place to ensure compliance of the participants of the CmiA Unit.

⁴ Dependent on the cotton sector structure in a country, Managing Entities either establish contracts with individuals or with farmers groups.



53. The Managing Entity is responsible for the timely submission of the initial and subsequent self-assessments and completeness of all requested data points as inquired in the CmiA Assurance Platform.
54. 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 as well as transportation.
55. 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.
56. The Managing Entity is the certificate holder, i.e. receives a CmiA Certificate after successfully completion of a verification cycle (successfully passed field level and ginnery level verifications).
57. The Managing Entity may appeal against a certificate issuing decision by the AbTF verification management following the CmiA Appeals Procedure, outlined in separate documents available at the [CmiA Website](#).

5. Assurance Procedures

5.1. General Approach of Verification

58. The Assurance System covers the verification of cotton production on the field-level (seed cotton) and at the level of cotton ginning (lint cotton). It enables AbTF to issue Managing Entities CmiA Certificates for sales of 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 either following the Mass Balance (MB) or the Hard Identity Preserved (HIP) system.
59. The Assurance System builds on three central elements:
 - i. **Self-assessment by the Managing Entity:** The Managing Entity has the obligation to provide an annual self-assessment on their operations, including data and information on associated farmers, and their performance against the CmiA criteria and indicators. The submission is done via 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 field level and ginnery level. It is obligatory that the verifiers 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 when the ginning process is ongoing, preferably when the ginneries are under full capacity, but at least the operation has 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 field and ginnery levels. To this end the CIP lays out improvement objectives of the Managing Entity. The Continuous-Improvement Plan is developed by the Managing Entity against improvement opportunities identified during third-party verification missions.

5.2. Verification Objectives and Methods

60. The general objectives of the verifications are to independently verify:
 - i. the correctness 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.
61. The verification requires the validation of the overall results reflected in the self-assessment by means of sufficient 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.
62. The verifier should record the evidence used to verify compliance and use professional judgment for evaluation.
63. Compliance with CmiA, CmiA Organic or SCS is verified on three levels:
 - i. Strategic level (management interview, document check at management level)
 - ii. Operational level (interviews with staff at ginneries, respectively extension staff and individual farmers or farmer groups, document check at local level, on-site observations)
 - iii. Stakeholder level (interviews with third parties concerned)
64. Objective evidence of compliance stem from results of interviews with the Managing Entity's management and staff members as well as CmiA-contracted farmers and other stakeholders, review of written documents such as manuals, procedures, plans or maps, physical inspection or testing of a piece of equipment, or a sample; viewing an example of a particular operation, such as spraying or harvesting, review of records such as written contracts, invoices, pay records or bank statements.
65. The AbTF seeks to promote systemic compliance with their sustainability standards, not a "check-list" or "inspection-day" approach. For this reason, the management system requirements of the standards 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 improvements are measured over time along via a qualitative assessment on the performance level for the indicators, replacing the traffic light system of earlier versions of the AbTF cotton standards.

5.3. The Verification Process

66. 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.
67. **Phase 0 – Candidateship for a CmiA Certificate:** If an actor in the cotton sector is interested to obtain a CmiA certificate and to become subject to cyclic CmiA verifications at field and ginnery levels, the AbTF S&O Unit (Verification Management) provides information on basic requirements, rights and duties to become a CmiA Managing Entity. To kick-start a verification cycle, the candidate must submit a completed self-assessment via the web-based CmiA Assurance Platform (CAP).
68. The AbTF S&O Unit (Verification Management) formally validates the self-assessment and registers the Managing Entity as “CmiA candidate”. If the validation at AbTF indicates that an initial CmiA verification has good prospects to be successful, 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 field and ginnery levels.
69. **Phase 1 – Engagement of Verifiers:** The AbTF Verification Management establishes an annual verification plan and coordinates the concrete verification missions with the respective Managing Entity and an accredited assurance provider, who then nominates qualified verifiers for the agreed verification mission.⁵
70. Verifications will be carried out by a team of two: one lead verifier and an assistant verifier. The selection criteria for lead and assistant verifiers include, amongst others, the qualification of verifiers, including language skills, availability of verifiers at the period required for the verification, and track record of the verifiers.
71. The AbTF selects and contracts the accredited assurance provider for each verification mission. Payment rules for the missions are set out under the section ‘Verification Fees’.

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



72. The Managing Entity is informed by the verifiers about the timing and duration of the verification mission at least two weeks prior to the verification. The Managing Entity has to ensure that key staff is available for the entire verification mission.
73. 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 get an oversight on relevant management plans, procedures, training documentation, maps, etc.
74. **Phase 2 – Preparation of the verification mission:** The AbTF 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 field or ginnery level).
75. The verifiers prepare the verification based on the formal review of the documents available beforehand, and analyse the self-assessment, the previous CAP Assurance and CIP with the aim to get an overview of structure, regions of activities, policies and procedures, and defined measures for improvement of the Managing Entity as well as to identify open questions and possible hot spots.
76. In case a self-assessment is not presented two weeks prior to the verification, or the Managing Entity was not informed by the verifiers in time, the AbTF Verification Management may cancel the planned verification.
77. **Phase 3 – On-site verification:** The verification mission consists of the following different steps:
 - i. Opening meeting and management interviews
 - ii. Document check
 - iii. Sampling
 - iv. On-site checks
 - v. Closing meeting with discussion of findings
78. 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. Goal of the opening meeting is to inform about the objectives of the verification and the clarification of open questions on the verification's proceedings. The opening meeting includes, amongst others, a clarification of roles and responsibilities (logistics), proceedings and agreement on the planned schedule (time and content), an update on recent events, issues, incidents related to or affecting the criteria and indicators of the CmiA Standard.



79. The verifiers shall now 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 local and national level. The management interview also serves to get 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. number of farmers, business model). During the management interview the verifiers shall gain comfort with regard to the management capacities and control mechanisms of the Managing Entity.
80. 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.
81. Normally, all the above-mentioned activities take place on day one of the site visit.
82. The objective of the **sampling** exercise is to gain sufficient insights to be able to reach verification objectives. In order to reach a sufficient level of comfort, a qualitative approach is applied to obtain samples suitable to gather 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 therefore is based on the degree of risks, geographic criteria, samples for impact assessment or simply randomly. Finally, sampling is a matter of professional judgement of the assigned verifiers.
83. Recommended risk parameters include number of farmers or farmer groups contracted, volume of cotton produced, and evaluation results of the Managing Entity's internal management and monitoring systems and capacities. Others are stakeholder information, recent events, or incidences. The inclusion of field-level and ginnery-level checks as part of the verification assist in the assessment of the effectiveness of the internal management and monitoring system of the Managing Entity.
84. In the case of the inclusion of CmiA Organic, the verifiers have to consider sampling the Organic Unit (if only a part of the CmiA Unit) for its organic certification to reach a sufficient level of comfort.
85. The Managing Entity will not determine which samples at which sites are visited. Verifiers found to be taking instructions from the Managing Entity on the samples to be verified will be reprimanded and risk losing their right to verify.



86. **On-site checks:** From day two onwards, the field or ginnery checks are to be performed. The verifiers should obtain sufficient supporting evidence for the confirmation, amendments, or changes of the Managing Entity's CAP Assurance.
87. Continuously, the verifiers need to check if reasonable comfort with the verification results is achieved. Field and ginnery verifications are to be continued until the verifiers, against their professional judgement, have reached a sufficient level of comfort. For field level verification a minimum of 5 working days and a maximum of 10 working days (including opening and closing meetings) can be used as a guideline. For each ginnery 2 working days (including opening and closing meetings) may be assumed as a sufficient verification period.
88. On the closing of the last day on site a final meeting the Managing Entity will take place to present and discuss the verification results, specifically the findings, observations and risks, potential improvement opportunities to obtain mutual understanding on results. The results of the closing meeting are to be documented and form part of the CAP Assurance.
89. **Phase 4 – Reporting:** Concluding the verification of the management system and operational implementation of strategies and processes, the verifiers document the verification results. Reporting of verification results requires an assessment of performance levels indicators as defined by the standards (including evidence, e.g. photos, of potentially observed non-compliances), as well as a summary overview of critical findings, risks identified, potential improvement opportunities identified, and progress made with regard to the Continuous-Improvement Plan.
90. The verifiers use the web-based CmiA Assurance Platform to document the verification results. The draft CAP Assurance is submitted to the AbTF verification management and the Managing Entity for comments and clarification.
91. The Managing Entity and the AbTF Verification Management are allowed 10 working days to comment on the draft CAP Assurance, including the qualitative assessment of the indicators. Once the comments are submitted, latest after 10 working days, the verifiers integrate eventual corrections, additional information or any comment that seems viable into CAP Assurance. The final version is, again, submitted via CAP to the Managing Entity and the AbTF verification management. The Managing Entity has five working days to validate the final results by formal acceptance. Silence is considered as consent. After finalisation, the verifiers confirm the CAP Assurance to acknowledge completion.

5.4. Types of Verification

92. **Initial Verification:** The initial verification is the first visit of verifiers to the Managing Entity. After submission of the self-assessment via CAP and its positive validation by the AbTF 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, assuring verifiable activities take place – one verification mission on field level, and another mission to verify ginnery level criteria and indicators. The CmiA licence is granted after the successful completion of the two above captioned verification missions. The Managing Entity will meet all expenses for the initial verification.

93. **Regular Verification:** After the initial verification, regular third-party verification missions take place. Regular verifications equally consist of two separate verification missions. AbTF strives to have an interaction between the Managing Entity and the verifiers at an annual basis by interchanging verifications at field level (e.g. even years) and ginnery level (e.g. odd years). The Aid by Trade Foundation will meet all expenses for the regular verification.
94. A **Follow-up Verification** may be necessary if the Managing Entity does not meet minimum requirements, i.e. 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 focuses on systemic non-conformities of specified indicators. The Managing Entity will meet all expenses for the follow-up verification.
95. **Addendum Verification:** The CmiA license is valid until completion 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 number of ginneries operated or commissioned. If there are significant changes, the AbTF Verification Management can call for an addendum verification.
96. A relevant change occurs if the number of CmiA-contracted farmers increases by at least 25% compared to the previous season, or if there is a new ginnery integrated. The Aid by Trade Foundation will meet the expenses of the addendum verification.
97. **Random Verification:** AbTF reserves the right to perform additional random verifications upon its discretion. Such a random verification will be announced at short-term with a minimum notification time of 72 hours before the mobilisation of such a random verification. Results of such random verifications will carry the same validity as an initial, regular or follow-up verification. AbTF will meet the expenses for random verifications.
98. Failure to comply with a request for a random verification, such as refusing verifiers access to information or contact to staff or CmiA-contracted farmers of the Managing Entity, can lead to a cancellation of the CmiA Certificate.

5.5. Verification Fees

99. Independent verifications are key to the reputation of the AbTF standards, the Aid by Trade Foundation as standards system owner and participating Managing Entities. Consequently, verifiers are not contracted by the individual Managing Entity but directly and centrally by the AbTF Verification Management. Hence, AbTF is in the



- position to adequately train and select assurance providers and (lead) verifiers from the pool of verifiers of the respective assurance providers, assure rotation of verifiers, allow verifiers to build their professional judgement, and assure quality verifications.
100. Consequently, verification fees, including travel and accommodation expenses shall be paid after completion of the verification by the Aid by Trade Foundation. Payment to the assurance provider is facilitated after validation of the CAP Assurance by the AbTF Verification Management.
 101. However, while AbTF coordinates initial verifications and, if necessary, follow-up verifications with the assurance providers, costs for those have to be covered by the Managing Entity.
 102. In case of CmiA Organic, the organic certification needs to be organised and paid for independently by the Managing Entity. If the Managing Entity provides evidence to having sold CmiA Organic to CmiA licence partners, AbTF will partly reimburse organic certification costs. The exact reimbursement is agreed between AbTF and the Managing Entity individually and depends on the volume of CmiA Organic cotton sold.
 103. Costs to verify CmiA Organic beyond captioned organic certification will be borne by the Aid by Trade Foundation, in line with the rules for CmiA verification described above.

6. Obtaining and Maintaining a CmiA Certificate

6.1. Required Verification Outcomes

104. The Managing Entity needs to be in conformity the Core Indicators outlined in the CmiA Standard, CmiA Organic Standard, or SCS respectively.
105. Non-conformity with Core Indicators may be categorised into two different types (i) **incidental non-conformity**, and (ii) **systemic non-conformity**.
106. **Incidental non-conformities** with Core Indicators are defined as:
 - i. unintended and observed as an isolated event, limited in temporal and spatial scale, and
 - ii. backed by provision of sufficient evidence by the Managing Entity that internal controls and mechanisms should prevent such practices.
107. In case of 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 in future.



108. A Follow-up Verification will be undertaken as soon as it is feasible to verify whether the measures taken by the Managing Entity are appropriate to mitigate the risks of non-conformity associated with the identified Core Indicators.
109. The Follow-up Verification must take place within a period of 12 months after the regular verification. This period starts with the last day of the regular verification (closing meeting) during which the incidental non-conformity was determined. The Follow-up Verification will focus on the identified non-conformity cases for Core Indicators.
110. In case 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 license.
111. The Managing Entity can ask for further Follow-up Verification. The second Follow-up verification must take place within a period of twelve months. The CmiA license can be reactivated in the event that this second Follow-up verification provides sufficient evidence that all Core Indicators are met and sufficient controls are in place so that the verifiers have reasonable comfort that practices leading to non-conformity are prevented in the future.
112. **Systemic non-conformities** with Core Indicators are defined as:
- i. Practices for which corroborative evidence demonstrates that one or more Core Indicators are not met, and
 - ii. The Managing Entity cannot provide sufficient evidence that internal controls and mechanisms prevent such practices.
113. In case of systemic non-conformity, the Managing Entity instantly loses its license to sell CmiA cotton.
114. The Managing Entity can ask for a Follow-up Verification. In the event that it provides sufficient evidence that all Core Indicators under investigation are met and sufficient controls are in place so that the verifiers have reasonable comfort that practices leading to systemic non-conformity are prevented in the future, the CmiA license can be reactivated.

6.2. Continuous-Improvement Mechanism to Maintain a CmiA Certificate

115. The concept of continuous improvement is not only reflected in the differentiation of Core and Improvement Indicators, but the AbTF 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 make a qualitative assessment of the performance of all Core and Improvement Indicators with the aim to identify areas where further action is needed.



116. 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.
117. While Managing Entities do not need to proof conformity with Improvement Indicators to receive a 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.
118. Based on the assessment results of the verification, the Managing Entity is required to improve its sustainability performance over time in order to maintain their 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.
119. In case of no improvements or regress, 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.
120. In the event that all Core and Improvement Indicators are performed at a very good or even ideal level, sustainability should be maintained.

6.3. Issuing of a CmiA Certificate

121. A certificate to confirm 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 has a validity of two years. The same procedure applies to the other AbTF cotton standards. The CmiA website provides an up-to-date list of all Managing Entity being certificate-holders: <https://cottonmadeinafrica.org/en/for-cotton-traders/>
122. AbTF will issue the certificate once the verifiers have confirmed successful completion of the two verification missions on both field and ginnery levels, and the final CAP Assessments, including the Managing Entity’s respective Continuous-Improvement Plans for field and ginnery levels, are available and accepted by AbTF and the Managing Entity.

6.4. Cancellation of a CmiA Certificate

123. AbTF can cancel the validity of an already established CmiA certificate due to an administrative reason or in case the Managing Entity does not comply with one or more of the requirements of
 - i. The annual submission of a complete and correct self-assessment on time,
 - ii. Ensuring an effective verification process (e.g. the Managing Entity refuses access),



- iii. The elaboration of a Continuous-Improvement Plan after each verification mission,
 - iv. No systemic non-conformity with CmiA Core Indicators is found during verification.
124. 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.
125. A Managing Entity with cancelled CmiA Certificate can apply for a new verification cycle, following the verification procedures as outlined under chapter 5 of this document. AbTF reserves the right to deny such application for good cause, e.g. false information has been intentionally submitted in the self-assessment.
126. Certificates can also be cancelled if there is a change in the status of a Managing Entity, e.g. the Managing Entity stops growing or ginning cotton.

7. Accreditation and Qualification of Assurance Providers and Verifiers

7.1. Accreditation of Assurance Providers

127. As the standards system owner, AbTF is the sole body to accredit assurance providers and individual verifiers. With accreditation AbTF ensures competency of **assurance providers** as external control bodies regarding AbTF's cotton standards and their ability to verify Managing Entities against these standards.
128. An assurance provider conducting verifications for AbTF's cotton standards is required to have an active registration according to ISO 17065 or ISO 19011.
129. An assurance provider needs to have a minimum of three years track record in verifying/auditing/certifying social and/or environmental sustainability standards.
130. An assurance provider needs to have conducted a minimum of ten social and/or environmental verifications/audits/certifications during the past three years.
131. The AbTF provides transparent access to the pool of accredited assurance providers and keeps record of each verifier's CmiA verification missions.
132. Assurance providers and verifiers are required to participate at their own expense in regular and extraordinary qualification measures executed by AbTF or organisations/persons expressly seconded by AbTF, including regular refresher training programs. The objective of the trainings is to ensure full understanding of the cotton standard requirements and to integrate learnings from verifiers into AbTF's assurance system.



133. Assurance providers are required to disclose to AbTF any material change since accreditation that may affect their independence or qualifications as required by AbTF.

7.2. Required Qualifications and Competencies of Verifiers

134. Social and environmental verifications rely to a large degree on the capacities of assurance providers and the competences and skills of their individual verifiers. Prerequisites to participate in qualification measures and CmiA verifications at the side of individual **verifiers** 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, and
- v. Relevant language skills.

135. To safeguard and maintain high quality of the CmiA assurance system, verifiers are required to participate in regular and, if applicable, extraordinary training exercise implemented by AbTF Verification Management and/or delegated trainers.

136. After successful participation in the verifier training by AbTF, the then approved verifiers should preferably work in mixed teams (female/male).

137. Previous documented and satisfactory CmiA verifications may qualify as proof of qualification of individual verifiers.

138. In case a combined Organic certification and CmiA Organic verification is planned, at minimum the lead verifier is required to hold a valid qualification/accreditation with the respective organic scheme.

139. 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 other relevant subject is encouraged but not required. Experience may substitute for education.
- ii. Trained 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 relevant national and local laws and regulations, such as the environment, labour, health and safety, in the country where the verification mission takes place.



- v. Apply 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. Conduct visual observation and inspection on cotton farms, cotton fields and ginneries and detect non-conformities with the CmiA standard.
 - vii. Verify the accuracy of collected information, provide significant and appropriate evidence to support findings and conclusions of the third-party verification and submit well-documented CAP Assurances.
 - viii. Oral and written language skills in English or French (depending on the country of verification).
 - ix. Computer knowledge.
 - x. Documented successful participation in theoretical verifier training regarding the CmiA standards system, including regular refresher trainings.
 - xi. Documented successful participation in practical auditor training and/or co-auditing of the CmiA standard.
140. In addition to the above mentioned, lead verifiers need to successfully complete a minimum of two verification missions acting as co-verifier under the direction and guidance of a recognized lead verifier and successfully complete one verification mission as lead verifier under the direction and guidance of a recognized lead verifier.

7.3. Continuous Quality Control

141. Verifiers need to disclose any potential conflict of interest to the AbTF Verification Management prior to their assignment.
142. Periodic reviews of verifiers performance will be undertaken by AbTF covering both feedback on the quality of CAP Assurances submitted and verification missions carried out on site.
143. Unannounced or announced shadow verifications are a means for the Verification Management to control the quality of conducted verifications as well as to support the learning process of the assurance system. A shadow verification is a visit by AbTF or designated external consultants during a verification mission with the aim to observe how the verifiers perform the different verification procedures (interviews with management, staff, and farmers; document review; visual inspections of fields or ginneries; etc.).
144. Written feedback will be provided to the verifiers by AbTF after each shadow verification visit and may include specific requirements to solve issues that were identified. AbTF may shadow a verifier as often as necessary to ensure identified issues are solved or may request documentation from the verifier that an identified issue is closed.



7.4. Assignment of Assurance Providers and Verifiers

145. 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.
146. Criteria taken into account are, amongst others, a rotation of assurance providers and verifiers, efficient planning of verification missions, and cost effectiveness. It is the aim that 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 regions are combined whenever possible.

7.5. Complaints, Sanctions and Withdrawal of Accreditation

147. In case of complaints against 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.
148. AbTF reserves the right to place assurance providers and individual verifiers on probation or 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 designated external consultants during shadow verifications, or based on feedback from Managing Entities
 - iv. Status of business or contractual relationship with AbTF
149. Whenever AbTF decides to place an assurance provider on probation or terminate the relationship, a formal communication shall be sent by AbTF to the assurance provider informing them of the decision and the reason, allowing 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 the timelines for each action. AbTF will decide whether the plan is approved or not. In the event that the plan is not approved, or the implementation of an approved plan fails to meet targets or timelines, 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.
150. Where AbTF terminates the relationship with an assurance provider, the assurance provider's name shall be removed from the CmiA website.



8. Standard-specific Additional Clauses

8.1. CmiA Organic

151. In essence, CmiA Organic is a dual certification of the CmiA standard and 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).
152. The Managing Entity has to undergo on field level an Organic certification to 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 Textiles Standard (GOTS).
153. A Managing Entity can be stand-alone CmiA Organic or partially producing CmiA Organic.
154. The geographical and organisational scope needs to be clearly defined and documented in a way that the verifiers are able to verify the CmiA Organic Unit.
155. There is no limitation with regards to the amount of farmers that convert to organic. However, the Managing Entity needs to define its conversion strategy and how to structure the CmiA Organic Unit (e.g. organic farmer groups, organic regions).
156. Failing the CmiA verification will result in the loss of the CmiA Organic license. However, the validity of the organic certificate itself will remain unaffected.
157. Failing the organic certification will cause the loss of the license to sell CmiA Organic lint. However, the standard CmiA Certificate will not be disrupted.
158. A CmiA Organic verification will be managed as a standard CmiA verification. AbTF pays for the verification.
159. All policies and procedures in this document are also applicable and binding for a CmiA Organic Managing Entity.

8.2. Sustainable Cotton Standard (SCS)

160. The Sustainable Cotton Standard (SCS) has been developed as a GMO-neutral standard, market at business-to-business (B2B) level.
161. All formal and procedural rules and regulations detailed in the CmiA Assurance Manual and applying 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 for 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 Currently the SCS is not applied; the document will only be created and published if required.



GLOSSARY

Appeal	Request by the Managing Entity to AbTF for reconsideration of their assessment decision.
Assessment	The combined processes of third-party verification, review, and decision on 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 a cotton standard of the AbTF are fulfilled. (Adapted from ISO 17000)
Assurance provider	Body responsible for performing the assessment of Managing Entities. (Synonym 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' sustainability performance beyond the level of Core indicators.



Managing Entity	The Entity that is seeking assurance of their conformance with the requirements of a cotton standard of the AbTF. 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 farmer numbers, crop yields, or completed training) and a detailed self-evaluation regarding the criteria and indicators of the CmiA standard.
Standards system	The collective of 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, here 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 specified 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 standard conformity, including opening meeting, management and other relevant stakeholder interviews, document checks, crosscheck on-site at field and ginnery levels, summarising verification results and close-out meeting.
Verifier	The person who performs the verification.
Verifying Company	Independent third-party company, ISO accredited, conducting verifications against AbTF cotton standards. (Synonym to assurance provider)