Chain Of Custody

GUIDELINES

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

1.1 Cotton made in Africa

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

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

1.2 CmiA Chain of Custody Guidelines

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

1.3 Scope

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

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

2.1 Terminology and Definitions

<table>
<thead>
<tr>
<th>TERM</th>
<th>DEFINITION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aid by Trade Foundation</td>
<td>Owner of the CmiA standards.</td>
</tr>
<tr>
<td>ATAKORA Fördergesellschaft GmbH</td>
<td>Trading company of the Aid by Trade Foundation that is responsible for the marketing and the supply chain management of CmiA.</td>
</tr>
<tr>
<td>Better Cotton Initiative (BCI)</td>
<td>A global, not-for-profit organisation that administers a sustainability standard for cotton.</td>
</tr>
<tr>
<td>CmiA cotton</td>
<td>Cotton produced by CmiA-verified cotton companies and the smallholder farmers they represent. Cannot be replaced with any other cotton.</td>
</tr>
<tr>
<td>CmiA Organic cotton</td>
<td>This standard complements both the existing eco-standard EC No. 834/2007 and NOP guidelines with additional social and economic criteria of CmiA.</td>
</tr>
<tr>
<td>CmiA product</td>
<td>Any cotton or cotton-containing product (after the trader level) that is bought or sold under a CmiA claim.</td>
</tr>
<tr>
<td></td>
<td>Under the mass balance system (see section 4.1 [3]), this term may also refer to a product that does not physically contain any CmiA cotton.</td>
</tr>
<tr>
<td>CmiA-BCI cotton</td>
<td>CmiA or SCS (Sustainable Cotton Standard) cotton, sold to the supply chain of Better Cotton Initiative (BCI), can also appear under the label “CmiA-BC” or “AbTF-BCI” (not to be used anymore).</td>
</tr>
<tr>
<td>CmiA standard</td>
<td>The criteria of the CmiA standard include ecological, social, and economic aspects of cotton production and processing. A two-stage list of criteria ensures that the participating cotton farmers successively adapt their farming methods—and the cotton producers their processing of the raw material—to increase ecological, economic, and social sustainability.</td>
</tr>
<tr>
<td>CmiA cotton producer</td>
<td>Other term for a CmiA-verified cotton company which includes ginneries and associated smallholder farmers that are compliant with the CmiA standard.</td>
</tr>
<tr>
<td>TERM</td>
<td>DEFINITION</td>
</tr>
<tr>
<td>------</td>
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</tr>
<tr>
<td>CmiA-nominated cotton trader</td>
<td>CmiA-nominated cotton traders have signed a contract with ATAKORA that enables them to purchase CmiA cotton from CmiA-verified cotton companies and to sell the cotton, either under the “CmiA” label to a CmiA-registered spinning mill or under the CmiA-BCI label to a BCI-registered spinning mill.</td>
</tr>
<tr>
<td>CmiA-registered spinning mill</td>
<td>CmiA-registered spinning mills have registered with CmiA to be allowed to purchase CmiA cotton, to process CmiA cotton, to label their yarns as CmiA, and to sell them to the next level of the supply chain. There are few requirements a spinning mill must meet to successfully register with CmiA.</td>
</tr>
<tr>
<td>CmiA-registered yarn trader/dye house</td>
<td>CmiA-registered yarn traders or dye houses have registered with CmiA to be allowed to purchase and to sell CmiA-labelled yarns to the next level of the supply chain. There are few requirements a yarn trader/dye house must meet to successfully register with CmiA.</td>
</tr>
<tr>
<td>CmiA-registered fabric producer</td>
<td>CmiA-registered fabric producers have registered with CmiA to be allowed to purchase CmiA-labelled yarns, to produce CmiA-labelled fabric, and to sell it to the next level of the supply chain. There are few requirements a fabric producer must meet to successfully register with CmiA.</td>
</tr>
<tr>
<td>CmiA-registered fabric trader</td>
<td>CmiA-registered fabric traders have registered with CmiA to be allowed to purchase and to sell CmiA-labelled fabrics. There are few requirements a fabric trader must meet to successfully register with CmiA.</td>
</tr>
<tr>
<td>CmiA-registered ready-made garment (RMG) producer (i.e. supplier or manufacturer)</td>
<td>CmiA-registered ready-made garment producers have registered with CmiA to be allowed to purchase CmiA-labelled yarns and fabrics, to carry out the final processes for the CmiA-labelled finished product, and to sell it to a retailer/brand. There are few requirements a ready-made garment producer must meet to successfully register with CmiA.</td>
</tr>
<tr>
<td>Importer/vendor</td>
<td>An organisation that buys finished products from ready-made garment producers and sells them to retailers/brands (business-to-business or B2B).</td>
</tr>
<tr>
<td>Retailer</td>
<td>A person or business that sells goods to the public in relatively small quantities for use or consumption rather than for resale (business-to-consumer or B2C). In this context, the term brand meets the same definition.</td>
</tr>
<tr>
<td>Code of Conduct</td>
<td>A Code of Conduct (PDF) is a set of rules outlining the norms and responsibilities or proper practices of an individual party or an organisation.</td>
</tr>
<tr>
<td>Conventional cotton</td>
<td>Refers to any cotton that was not produced by CmiA smallholder farmers. Conventional cotton can include organic cotton or cotton certified under other sustainability standards.</td>
</tr>
<tr>
<td>Hard Identity Preserved system (HIP)</td>
<td>The Hard Identity Preserved system (HIP) is a content claim. Within this system, it is not allowed to mix CmiA cotton with conventional cotton at any stage of production. An optional online Tracking System provides complete transparency throughout the entire value chain (see section 4.2).</td>
</tr>
<tr>
<td>TERM</td>
<td>DEFINITION</td>
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<td>-------------------------------------------</td>
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<tr>
<td>Mass Balance system (MB)</td>
<td>At the spinning mill level, CmiA cotton may be blended with cotton of other origins, as long as the balance between purchased CmiA cotton and yarns sold as CmiA is maintained. This is verified through quantity checks and a Tracking System that ensures that the amount of purchased CmiA cotton corresponds to the amount of CmiA-labelled yarns (see section 4.1).</td>
</tr>
<tr>
<td>Sustainable Cotton Tracker (SCOT)</td>
<td>CmiA Tracking System used by all members of the CmiA supply chain who are trading or producing CmiA cotton, CmiA-labelled yarns, CmiA-labelled fabrics or CmiA-labelled products. All sales and purchases must be reported to the system.</td>
</tr>
</tbody>
</table>

2.2 SCOT Helpdesk

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

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

Please reach out to the SCOT helpdesk for the following issues:
- Help with new registration in the system
- Password renewal
- Questions related to data upload/input
3 CmiA registration requirements and Basic rules
3.1 Overview

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

<table>
<thead>
<tr>
<th>SUPPLY CHAIN LEVEL</th>
<th>FORM OF PARTNERSHIP WITH CMIA</th>
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<td>Cotton trader</td>
<td>Partnership contract</td>
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<td>Spinning mill</td>
<td>CmiA registration</td>
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<td>Yarn trader/dye house</td>
<td>CmiA registration</td>
</tr>
<tr>
<td>Fabric producer</td>
<td>CmiA registration</td>
</tr>
<tr>
<td>Fabric trader</td>
<td>CmiA registration</td>
</tr>
<tr>
<td>Ready-made garment producer</td>
<td>CmiA registration</td>
</tr>
<tr>
<td>Importer</td>
<td>CmiA registration</td>
</tr>
<tr>
<td>Retailer</td>
<td>Licensing contract</td>
</tr>
</tbody>
</table>

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

🔗 cottonmadeinafrica.org/en/

or on the Cotton made in Africa app, available at:

📱 Android Playstore

🍎 Apple Appstore
3.2 Cotton Trader

3.2.1 Partnership Contract Options

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

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

- CmiA cotton
- CmiA-BCI cotton
- SCS (Sustainable Cotton Standard) cotton
- CmiA Organic cotton

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

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

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

2. CmiA cotton sold to the BCI supply chain. It is sometimes also referred to as CmiA-BCI or AbTF/BCI cotton.
3.2.2 Administrative Set-Up

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

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

3.2.3 Purchase of CmiA Cotton

→ CmiA-nominated cotton traders must purchase CmiA cotton only from CmiA-verified cotton producers or other CmiA-nominated cotton traders. Updates on the status of CmiA-verified cotton producers must be regularly checked at: CmiA BCI Cotton Companies (PDF) or for the other CmiA-nominated cotton traders here (PDF).

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

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

3.2.4 Sale of CmiA Cotton

→ All contracts for sales of CmiA cotton to CmiA-registered spinning mills must clearly state “CmiA” cotton on the document. Sales of CmiA cotton to BCI-registered spinning mills must contain the remark “CmiA-BCI” on all documents. Traders can also sell CmiA cotton to other CmiA-nominated cotton traders.⁵

3.2.5 Data Entry in SCOT

→ Cotton traders must enter all purchases and all sales to CmiA-registered spinning mills or CmiA-nominated cotton traders into SCOT within 30 calendar days of the contract date.

Sales transactions of CmiA-BCI cotton to BCI spinning mills and other cotton traders and agents must be reported as well within 30 calendar days of the contract date. This is done for purposes of volume reporting only, but no Better Cotton Claim Units (BCCUs) will be transferred to the BCI Platform. CmiA-designated sales must be acknowledged by the relevant CmiA-registered spinning mill in the SCOT system.

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

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

3.2.6 Monitoring/Sanctions

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

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⁵ This will be automatically handled as “CmiA-BCI” sales in the system. Detailed information can be found in the SCOT User Manual.
3.3 Spinning Mill

3.3.1 Registration Requirements

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

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

3.3.2 Purchase of CmiA Cotton

CmiA-registered spinning mills must purchase CmiA-verified cotton from CmiA-nominated cotton traders (PDF). Updates on the status of the CmiA-nominated cotton traders must be regularly checked.

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

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

3.3.3 Sale of CmiA-Labelled Yarns

All sales contracts for CmiA-labelled yarns must clearly state “CmiA yarn” on the document.

3.3.4 Data Entry in SCOT

Spinning mills must enter all sale transactions into SCOT within 30 calendar days of the contract date. CmiA cotton purchases by CmiA-registered spinning mills must be reported to SCOT by the cotton traders only. For purchases of CmiA cotton to be included in their cotton balance, spinning mills must acknowledge each purchase in their SCOT account.

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

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

3.3.5 Monitoring/Sanctions

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

3.3.6 CmiA and BCI

CmiA and BCI are two separate organisations that hold a partnership. CmiA cotton can be purchased from CmiA-nominated cotton traders and can be used for production in the BCI supply chain. When buying CmiA cotton for BCI production, the spinning mills must ask explicitly for “CmiA-BCI” cotton. For detailed information about the BCI Platform and how to declare CmiA cotton as BCI cotton, please contact BCI directly.

BCI cotton cannot be used for the CmiA supply chain. If CmiA cotton is purchased and registered on the BCI Platform, it cannot be declared as CmiA cotton anymore.

If a spinning mill wants to use CmiA cotton for CmiA production, but that cotton has already been declared on the BCI Platform, the BCI office must be contacted to delete the corresponding amount from the BCI Platform. In addition, the cotton trader must be informed and instructed to update the cotton purchase record in the SCOT system. Documentation for these steps as well as the cotton purchase document must be provided to CmiA.

Detailed information about the “CmiA-BCI” usage and data input into SCOT can be found in the SCOT User Manual.
3.4 Yarn Trader/Dye House

3.4.1 Registration Requirements

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

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

3.4.2 Purchase of CmiA-Labelled Yarns

Yarn traders/dye houses must accurately document their process for procuring CmiA-labelled yarns. They must retain all documents and records related to the purchase, handling, and sale of CmiA-labelled yarns for a minimum period of two years. Evidentiary documentation for purchases of CmiA-labelled yarn must always specifically state “CmiA” yarn.

3.4.4 Data Entry in SCOT

Yarn traders/dye houses must enter all sales and purchase transactions into SCOT within 30 calendar days of the contract date. For purchases of CmiA-labelled yarn to be included in their yarn balance, yarn traders/dye houses must acknowledge each purchase in their SCOT account.

3.4.3 Sale of CmiA-Labelled Yarns

All sales contracts for CmiA-labelled yarns must clearly state “CmiA yarn” on the document.

3.4.5 Monitoring/Sanctions

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

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3.5 Fabric Producer

3.5.1 Registration Requirements

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

- Accept the Cotton made in Africa Code of Conduct (PDF) and the Cotton made in Africa Chain of Custody Guidelines.

- Provide company-relevant information (e.g. product details).

- Pay the annual registration fee.

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

- Confirm that the persons responsible for using SCOT, for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required records are trained and competent to fulfill relevant chain-of-custody requirements. All individuals responsible for using SCOT must attend the SCOT training.

3.5.2 Purchase of CmiA-Labelled Yarns

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

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

Evidentiary documentation for purchases of CmiA-labelled yarn must always specifically state “CmiA” yarn.

3.5.3 Sale of CmiA-Labelled Fabrics

Fabric producers must first purchase CmiA-labelled yarns before being allowed to sell CmiA-labelled fabrics.

All contracts for sales of CmiA-labelled fabrics to CmiA-registered ready-made garment producers or fabric traders must clearly state “CmiA fabric” on the document.

3.5.4 Data Entry in SCOT

Fabric producers must enter all CmiA yarn purchase transactions and all CmiA fabric sales transactions into SCOT within 30 calendar days of the contract date. Sales and purchases must be acknowledged by the next partner in the supply chain.

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

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

3.5.5 Monitoring/Sanctions

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

3.6 Fabric Trader

3.6.1 Registration Requirements

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

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

3.6.2 Purchase of CmiA-Labelled Fabrics

Fabric traders must purchase CmiA-labelled fabrics only from CmiA-registered fabric producers. Updates on the status of CmiA-registered fabric producers must be regularly checked (xlsx). Fabric traders must accurately document their process for procuring CmiA-labelled fabrics, retaining all documents and records related to the purchase, handling, and sale of CmiA-labelled fabrics for a minimum period of two years.


3.6.3 Sale of CmiA-Labelled Fabrics

Fabric traders must first purchase CmiA-labelled fabrics before being allowed to sell CmiA-labelled fabrics. All contracts for sales of CmiA-labelled fabrics to CmiA-registered ready-made garment producers must clearly state “CmiA fabric” on the document.

3.6.4 Data Entry in SCOT

Fabric traders must enter all purchases from CmiA-registered fabric producers and all sales to CmiA-registered ready-made garment producers into SCOT within 30 calendar days of the contract date. Sales and purchases must be acknowledged by the next partner in the supply chain.

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

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

3.6.5 Monitoring/Sanctions

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

3.7.1 Registration Requirements

- Ready-made garment (RMG) producers must fulfil the following registration requirements in order to successfully receive a CmiA registration that is valid for one year:
  
  - Accept the Cotton made in Africa Code of Conduct [PDF] and the Cotton made in Africa Chain of Custody Guidelines.
  
  - Provide some company-relevant information (e.g. product details).
  
  - Pay the annual registration fee.
  
  - Appoint one or more designated representatives who are responsible for ensuring compliance with the relevant Cotton made in Africa chain-of-custody requirements and for recording relevant data in the Sustainable Cotton Tracker (SCOT) system.
  
  - Confirm that the persons responsible for using SCOT, for ensuring compliance with the Cotton made in Africa Chain of Custody Guidelines, and for maintaining the required records are trained and competent to fulfil relevant chain-of-custody requirements. All individuals responsible for using SCOT must attend the SCOT training.

3.7.2 Purchase of CmiA-Labelled Fabrics

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

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


3.7.3 Sale of CmiA-Labelled Products/Garments

- Ready-made garment producers must first purchase CmiA-labelled yarns or CmiA-labelled fabrics before being allowed to sell CmiA-labelled products.

All contracts for sales of CmiA-labelled final products to CmiA licensing partners (retailers) must clearly state “CmiA product” on the document.

3.7.4 Data Entry in SCOT

- Ready-made garment producers must enter all purchases from CmiA-registered spinning mills, yarn traders/dye houses, fabric producers or fabric traders into SCOT within 30 calendar days of the contract date. Latest on product shipment date, they must also provide information about how they fulfilled/covered/produced the CmiA products for their CmiA licensing partners (retailers).

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

3.7.5 Monitoring/Sanctions

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

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3.8 Importer

3.8.1 Registration Requirements

Informers must fulfil the following registration requirements in order to successfully receive a CmiA registration valid for one year:

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

3.8.2 Purchase of CmiA-Labelled Products

Importers must purchase CmiA-labelled products only from CmiA-registered ready-made garment producers. Updates on the status of CmiA-registered ready-made garment producers must be regularly checked (xlsx).

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

Evidentiary documents for CmiA-labelled products must always specifically state “CmiA”.

3.8.3 Sale of CmiA-Labelled Products

All contracts for sales of CmiA-labelled products to CmiA licensing partners (retailers) must clearly state “CmiA product” on the document.

3.8.4 Data Entry in SCOT

Importers are receiving CmiA order data from CmiA-licensed partners (retailers) in their SCOT account. Subsequently they must select from which CmiA-registered ready-made garment producers they will purchase the product and forward the relevant order data to corresponding CmiA-registered ready-made garment’s SCOT account.

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

3.8.5 Monitoring/Sanction

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

3.9 Retailer

3.9.1 Licensing Contract Requirements

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

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

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

- Mass Balance (MB): Focusses on increasing the demand for CmiA cotton; it does not permit content claims (see section 4.1).
- Hard Identity Preserved (HIP): Permits content claims (see section 4.2).
3.9.3 Administrative Set-Up

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

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

Before placing any CmiA orders, the persons responsible must provide Cotton made in Africa with the relevant information about all levels of the retailer’s CmiA supply chain. For each level, an account must be created in SCOT. Further information can be found in the SCOT User Manual.

3.9.4 Purchase of CmiA-Labelled Products


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

Evidentiary documents for CmiA products must always specifically state “CmiA”. Retailers must ensure that all partners throughout their supply chain are properly informed about the chosen CmiA implementation system and its application.

3.9.5 Data Entry in SCOT

Retailers must regularly provide their order information for CmiA products to the SCOT system. Relevant order information include: importer/supplier name and country, article description, quantity, composition, and planned delivery date.

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

4.1 Mass Balance (MB)

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

- CmiA cotton must be kept segregated at all stages of harvest, storage, transport, and processing at the farm and ginnery (cotton producer) level.

- No blending of or substitution between CmiA and non-CmiA cotton is permitted.

- CmiA cotton must be clearly marked (e.g. with signage and in the sales documents).

- Sales of CmiA cotton by cotton producers to CmiA-nominated cotton traders comprise exclusively cotton from CmiA farmers (produced in compliance with the Cotton made in Africa standard, Volume 3).

- It is always the duty and responsibility of the purchasing entity to check whether the delivering entity holds a valid CmiA verification.

- Sales of CmiA cotton by CmiA-nominated cotton traders to CmiA-registered spinning mills must comprise exclusively cotton from CmiA-verified cotton producers (produced in compliance with the Cotton made in Africa standard, Volume 3) and must be clearly marked as “CmiA”, especially in all sales documents.

- Physical traceability from CmiA-verified cotton producers to CmiA-registered spinning mills is mandatory.

Figure 1: The CmiA Mass Balance system throughout the supply chain

PRODUCT SEGREGATION OF CMIA COTTON  
MASS BALANCE ACCORDING TO THE CMIA CHAIN OF CUSTODY GUIDELINES

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

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

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

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

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

Figure 2: CmiA Mass Balance at the spinning mill level
4.2 Hard Identity Preserved (HIP)

Retailers are responsible for the proper implementation of the Hard Identity Preserved (HIP) system throughout their supply chain. They must ensure that the CmiA material can be traced back to its CmiA country of origin and that it has been kept physically segregated from cotton of other origins during storage, transportation, and processing.

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

- CmiA cotton and conventional cotton must be kept segregated at all stages of harvest, storage, transport, and processing at the farm and ginnery (cotton producer) level.
- No blending of or substitution between CmiA cotton and non-CmiA cotton is permitted at any level of the supply chain.
- CmiA cotton must be clearly marked (e.g. with signage and in sales documents).
- Sales of CmiA cotton by cotton producers \(^9\) to CmiA-nominated cotton traders \(^10\) must comprise exclusively cotton from CmiA farmers (produced in compliance with the Cotton made in Africa standard, Volume 3 \(^11\)).
- It is always the duty and responsibility of the purchasing entity to check whether the delivering entity holds a valid CmiA verification.
- CmiA cotton and non-CmiA cotton must be kept segregated during all stages of transportation between the cotton producer and the spinning mill.

• Under the HiP system, this approach must be applied to all supply chain organisations (from the spinning mill through to the retailer).

• CmiA cotton and conventional cotton must be kept segregated at all stages of storage, inter-facility transportation, and processing at the spinning mill level. Segregation may be physical (e.g. separate production lines) or temporal (e.g. separate production runs).

• CmiA yarn and non-CmiA yarns must be kept segregated at all stages of storage, inter-facility transportation, and processing at the spinning mill level. Segregation may be physical (e.g. separate production lines) or temporal (e.g. separate production runs).

• CmiA cotton must be clearly marked at all stages of storage, inter-facility transportation, and processing at the spinning mill level (e.g. with signage and in sales documents).

• No blending of or substitution between CmiA cotton and non-CmiA cotton is permitted. However, CmiA cotton can be blended with other, non-cotton fibres.

• Spinning machinery is not required to be cleaned between CmiA HIP yarn production and any non-CmiA type of cotton production.

• CmiA yarn and non-CmiA yarns must be kept segregated at all stages of storage, inter-facility transportation, and processing at the spinning mill level. Segregation may be physical (e.g. separate production lines) or temporal (e.g. separate production runs).

• CmiA yarns must be clearly marked at all stages of storage, inter-facility transportation, and processing at the spinning mill level (e.g. with signage and in sales documents).

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

• The same procedure applies for fabric and ready-made garment producers. To be labelled with the “Cotton made in Africa Inside” logo, the final product must be composed of at least 50 percent cotton, with the remaining percentage comprising any other, non-cotton fibre. The entire cotton share (100 percent of the cotton contained in the final product) must be CmiA cotton.
5 Product and Corporate Marketing

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


6 Grievance mechanism

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

https://cottonmadeinafrica.org/en/
7 Relevant Documents

- Cotton made in Africa standard, Volume 3 (PDF)
- CmiA Code of Conduct (PDF)
- Documents for Cotton Traders
- Documents for Spinning Mills
- Documents for Fabric Producers
- Documents for Ready-Made Garment Producers
- CmiA Claims Framework
- Complaint Policy and Procedures
AID BY TRADE FOUNDATION

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

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

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