

Better Cotton Chain of Custody Standard v1.0 Monitoring and Assessment Process*

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*Please note this document is in Beta phase and will be under constant revision and may be subject to changes.

1. Introduction

1.1 Better Cotton Chain of Custody

Better Cotton, a global not-for-profit organisation, is the largest cotton sustainability programme in the world. Our mission is to help cotton communities survive and thrive while protecting and restoring the environment, delivering progressive, measurable change for the better at field level, in line with the 2030 Sustainable Development Goals (SDGs). Better Cotton is a joint effort, working together with organisations from farms to suppliers, manufacturers, and brands, to transform cotton production worldwide, building on Better Cotton's status as a sustainable mainstream commodity to deepen impact.

The Better Cotton Standard System is a holistic approach to sustainable cotton production and raw material sourcing which covers the three pillars of sustainability: environmental, social, and economic. Each element of the system, from the Better Cotton Principles and Criteria (P&Cs) to the monitoring mechanisms which show results and impact, work together to drive the adoption of sustainable practices.

The Better Cotton Chain of Custody (CoC) Standard is the key framework that connects Better Cotton supply (which is produced in accordance with the Better Cotton P&Cs) with demand. The CoC Standard sets out auditable requirements for organisations in the supply chain that are buying or selling physical Better Cotton, or cotton-containing products as Better Cotton Mass Balance orders (as defined in 1.2.1 of the CoC Standard). Manufacturers, suppliers, retailers, and brands can claim the use of physical Better Cotton in their products, or support of our field-level programmes through the sourcing of Mass Balance orders, when they adhere to the requirements of the Better Cotton CoC Standard and the Better Cotton Claims Framework.

Over the years, the CoC Standard will continue to evolve in line with good practice. Version 1.0 of the CoC Standard enables the tracing of physical Better Cotton to Country of Origin. In line with Better Cotton's Traceability Programme strategy, we intend for future major iterations of the CoC Standard to facilitate traceability to a more granular level. The pace of change will be informed by uptake of physical Better Cotton and determined in consultation with key stakeholders across the cotton value chain.

1.2 Purpose of this document

This document describes the process of monitoring visits and assessments for all supply chain actors that are buying and selling physical Better Cotton and/or Mass Balance orders. This includes a description of the monitoring and assessment process to be followed by Better Cotton staff or third-party assessors¹ to ensure a consistent methodology is applied.

The purpose of this document is to:

- Provide information to organisations wishing to join the Better Cotton CoC programme about ongoing assessment and monitoring expectations.
- Describe the process of monitoring visits and assessments against the Better Cotton CoC Standard v1.0 so that a consistent approach can be applied.
- Establish the minimum requirements of a consistent methodology on how verification should be conducted.
- Requirements for post-assessment activities

1.3 Normative Documents

The following documents are relevant to all organisations wishing to operate against the Better Cotton Chain of Custody:

- Better Cotton Chain of Custody Standard version 1.0
- Better Cotton Chain of Custody Monitoring and Assessment Process (this document)
- Better Cotton Platform Terms & Conditions

1.4 Effective Date

The Better Cotton Chain of Custody Standard v1.0 and associated normative documents are available from May 2023. Organisations seeking to sell physical Better Cotton may register their interest immediately upon publication of the Standard and verification activities shall begin by October 2023. Better Cotton shall be implementing a phased approach to allow a build-up of supply of physical Better Cotton in the appropriate parts of the supply chain. The Better Cotton Chain of Custody Guidelines will still be available for those wishing to make only Mass Balance claims until May 2025. All organisations seeking to trade Better Cotton shall then be required to adhere to the requirements of the Better Cotton Chain of Custody Standard v1.0 from May 2025.

¹ For the purpose of this document, Better Cotton staff who carry out monitoring visits and third-party assessors who conduct independent assessments are collectively refer to 'The assessor'

2 Assessment Process

2.1 Better Cotton Registration and monitoring levels

Initial entry into the programme

The Better Cotton CoC Standard requirements are applicable globally for all supply chain organisations that are buying or selling physical Better Cotton or fulfilling Better Cotton Mass Balance orders. These include (but are not limited to) middlemen and markets for raw seed cotton, ginners, merchants, lint traders, mills with spinning capabilities, mills or suppliers without spinning capabilities (including fabric mills, dyeing mills, yarn and/or fabric traders, vertical mills), end-product manufacturers, sourcing agents, and retailers and brands with their own manufacturing capabilities.

Each organisation wishing to initially enrol into the CoC programme shall adhere to the requirements set out in the CoC Standard, the BCP User Manuals, BCP Terms and Conditions, and this document.

Prior to entering the CoC programme, the organisation shall select the supply chain model(s) that they wish to apply to their organisation and submit a declaration of interest to Better Cotton. Organisations can apply for multiple supply chain models. The organisation is required to meet the requirements for that specific model(s). Failure to comply with the relevant requirements may either result in a different model being required (e.g., failure to comply with segregation rules may result in only the Mass Balance model being applied), or in a suspension or rejection of the organisation to enter the programme.

An exception to this is for Ginners who are always required to physically segregate their Better Cotton. Ginners are also required to complete an annual Better Cotton Ginning Factory Agreement and adhere to the requirements in this document.

Organisations seeking to apply one or more of the physical segregation models (Segregation - Single Country); Segregation - Multi Country; Controlled Blending) shall be required to complete a Better Cotton Registration Form prior to enrolment into the programme. This shall be done using a tool provided by Better Cotton. Completing the form requires the submission of documentation to verify self-reported responses.

Organisations **only** seeking to apply the Mass Balance model and wanting to adhere to the Better Cotton Chain of Custody Standard v1.0 will currently be considered as **Category A** (more details in section 2.2 of this document) and subject to monitoring as outlined in the 'Overview of BCI Supply Chain Monitoring' document which is available on the Better Cotton [website](#). They shall be required to register on the Better Cotton Platform and complete the required online training modules.

The Better Cotton team will also conduct an initial screening of applicants to the programme to review any other potential integrity risks that could bring the reputation of Better Cotton into disrepute. If issues are identified and the decision is made to reject the applicant, they will be informed of this decision. If the applicant is rejected based on the initial screening process, they shall not be allowed to re-apply for a minimum of 12 months and even then, the reasons for the rejection shall have been corrected prior to consideration. Organisations have the option to appeal any decision made because of an assessment or monitoring activity, and complaints received shall be handled as per the Better Cotton Complaints Policy.

Submitted Better Cotton Registration Forms will be reviewed by the Better Cotton team within 30 working days and a category will be applied based on the information provided². This category will determine the level of monitoring conducted on an organisation seeking to trade physical Better Cotton.

The following describes the monitoring process for each category of organisation:

- **Category A** – Organisations classified as lower risk will need to be assessed within 3 years of entering the programme and will be subject to the ongoing monitoring and verification work done by the Better Cotton team.
- **Category B** – A remote or on-site assessment is required within 12 months of entering the programme. For Ginners this will depend on the season and will need to happen during a season.
- **Category C** – A physical on-site assessment by an approved Third-Party Verifier (3PV) is required before the site can start trading physically traceable Better Cotton.

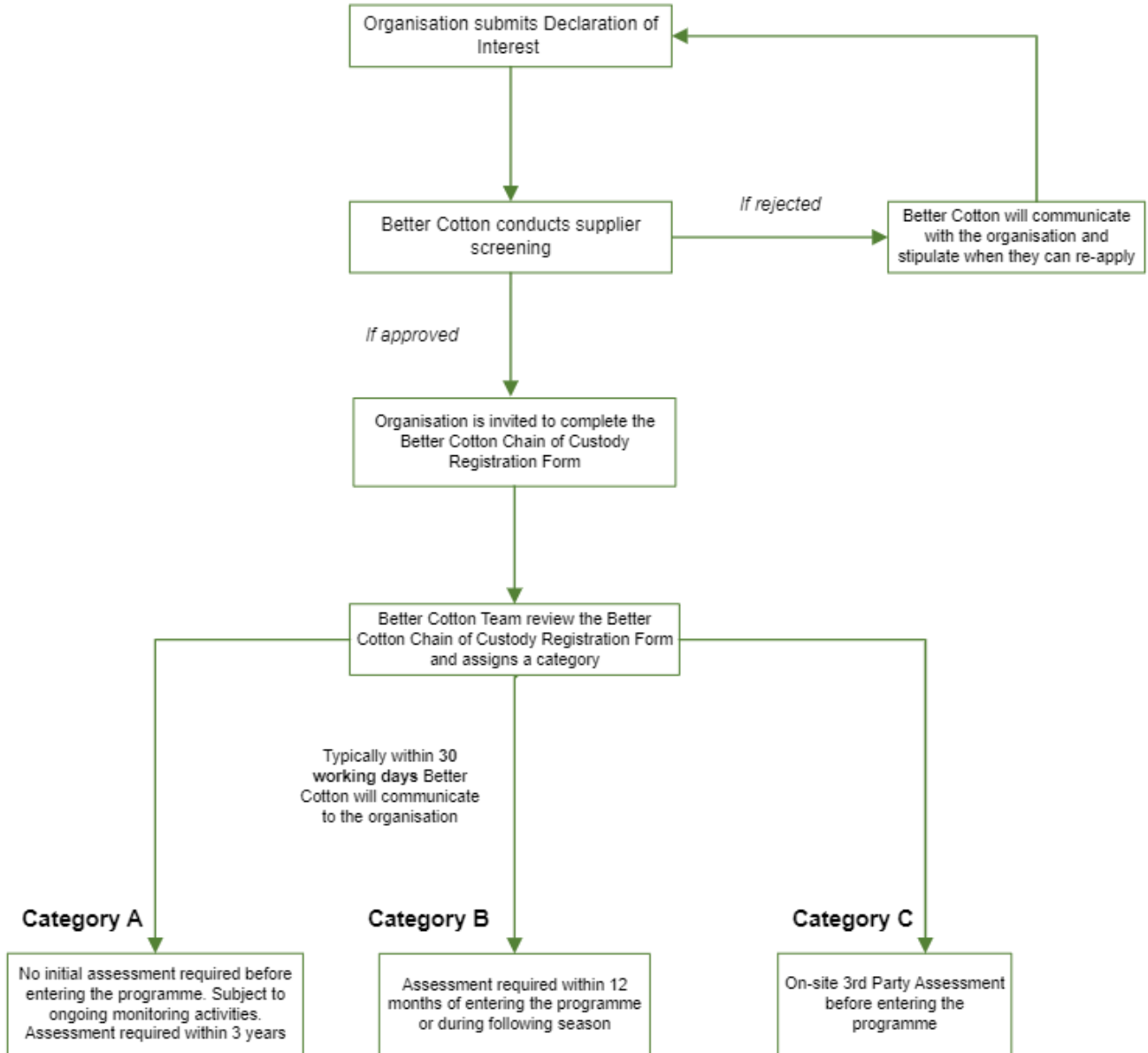
The category assigned to an organisation is at the discretion of the Better Cotton team and could be amended at any point based on additional information discovered while an organisation is in the Better Cotton CoC programme. The category can also be amended based on demonstrable adherence to the requirements of the CoC Standard and other normative documents.

Better Cotton reserves the right to reject any application to the CoC programme. An organisation who has their application rejected shall not re-apply within 12 months of their previous application.

Once a category has been assigned to an organisation, they cannot re-submit a registration form within 12 months.

² The Better Cotton team may request additional information and clarification which could extend the duration of this process

Diagram 1 – Initial application process



2.2 Enrolment process

Once the category has been assigned and the monitoring process defined, organisations shall follow the below required steps.

Category A

Organisations in this category shall register on the Better Cotton Platform and complete the relevant online BCP training modules. Organisations in this category will be placed under the typical Better Cotton monitoring and surveillance programme and will require an assessment within 3 years of entering the programme.

Category B

Organisations in this category shall register on the Better Cotton Platform and complete the relevant online training modules.

Within 12 months of being registered on the BCP the organisation shall contact an approved Third-Party Verifier to arrange an assessment against the Better Cotton Chain of Custody Standard v1.0. A list of approved Third-Party Verifiers can be found on the Better Cotton website. If an organisation has difficulty contacting an approved Third-Party Verifier and/or arranging an assessment date, they shall contact the Better Cotton team to assist with arranging the assessment.

Once a date has been agreed for the assessment the Third-Party Verifier shall inform Better Cotton of the scheduled date. If there are any changes the Third-Party Verifier shall inform Better Cotton within 3 working days of the change.

The organisation shall successfully complete the assessment and respond to any non-conformities as per section 2.7 - 2.8 of this document.

If the organisation fails to have their assessment within 12 months of their registration, the organisation shall be suspended until they successfully complete their assessment.

Category C

Organisations in this category shall contact an approved Third-Party Verifier to arrange an assessment against the Better Cotton Chain of Custody Standard v1.0. A list of approved Third-Party Verifiers can be found on the Better Cotton website. If an organisation has difficulty contacting an approved Third-Party Verifier and/or arranging an assessment date, they shall contact the Better Cotton team to assist with arranging the assessment.

Once a date has been agreed for the assessment the Third-Party Verifier shall inform Better Cotton of the scheduled date. If there are any changes the Third-Party Verifier shall inform Better Cotton within 3 working days of the change.

The organisation shall successfully complete the assessment and respond to any non-conformities as per section 2.7 – 2.8 of this document.

An organisation shall only be granted access to the physical traceability environment of the Better Cotton Platform and purchase and sell physical Better Cotton once they have successfully completed the assessment. If the organisation fails to have an assessment within 90 days of their category confirmation or does not close out non-conformities, they shall be required to re-apply and submit a new Registration form.

Upon successful completion of the assessment the organisation shall register on the Better Cotton Platform and complete the relevant online BCP training modules.

2.3 Training and Guidance

Better Cotton shall develop training for organisations seeking to operate against the Better Cotton Chain of Custody Standard v1.0. Ginners shall attend annual training arranged by Better Cotton, this may be in-person or remote. For other supply chain actors, attendance at a training course is highly recommended prior to entering the Better Cotton Chain of Custody programme.

All organisations that interact with the Better Cotton Platform (BCP) shall take the online training on the platform prior to entering transactions.

Better Cotton will also develop guidance for organisations seeking to enter the CoC programme and this guidance will be available on the Better Cotton website.

It should be noted that attendance of a training course or review of guidance does not guarantee that an organisation will be verified to operate against the Better Cotton Chain of Custody Standard v1.0.

2.4 Monitoring and assessment planning

The following section outlines the process that will be followed whenever an on-site assessment is requested, either due to the category assigned or as part of other ongoing monitoring and verification work.

2.4.1 Assessment agreement

The organisation shall enter into an assessment agreement with an approved Third-Party Verifier. The agreement shall be signed by both parties and include the following aspects as a minimum:

- Scope of the assessment
- Duration of the assessment
- Cost of the assessment
- That the organisation agrees to adhere to the requirements of the Better Cotton Chain of Custody Standard v1.0

- Confidentiality of information reviewed as part of the assessment.
- The organisation's right to appeal a decision made.
- The right of the Third-Party Verifier and Better Cotton to request records and documents deemed necessary for the purposes of the assessment or to verify compliance with the Standard.
- The right of the Third-Party Verifier to share assessment data with Better Cotton
- Requirements around confidentiality and declarations
- References that Better Cotton may suspend the organisation if there is evidence of a failure to adhere to the requirements in normative documents associated to the Better Cotton Chain of Custody Standard. This includes the claims framework and terms and conditions.
- Reference that Better Cotton staff may attend assessments.
- Duration of the agreement

2.4.2 Assessment preparation

The organisation and assessor shall communicate to arrange for an onsite monitoring assessment. The assessor should re-confirm the date for their planned visit with the company at least two weeks in advance. Third-Party Verifiers shall copy Better Cotton staff into their correspondence with the organisations in scheduling assessments and shall contact the Better Cotton team if there is no response to the assessment request.

The assessment should take place while the organisation is in production.

For existing organisations in the CoC programme, if the organisation does not respond to either Better Cotton or the Third-Party Verifiers after 3 email reminders and 1 phone call, then BCP user access shall be temporarily blocked until the organisation responds to the assessment request.

If the organisation is initially applying to be in the CoC programme their application will be paused until they have responded to the assessment request. **Failure to respond 30 days after notice is given will result in cancellation of the organisation's application.** Organisations will then need to re-submit their registration form and restart the application process.

The assessor shall develop an assessment plan and shall use the latest version of the CoC Standard, report, binding documents, and data provided for preparing, executing and reporting the assessment. Please check the Better Cotton website or contact Better Cotton Supply Chain team if there are any questions.

While preparing for the assessment, assessors should confirm information on the language that is locally spoken. If local language is not spoken by the assessor/team of assessors, appropriate, independent, and impartial translation services must be arranged.

The following information shall be verified with Better Cotton during assessment preparation (and before onsite visit being carried out):

- Better Cotton membership or BCP user status

- BCP account types
- Training participation in the last 12 months
- Any previous Non-conformities (NCs)
- Any prior complaint received.
- Relevant outputs from the Registration Form
- Relevant outputs from the Self-Assessment
- Names of subcontractors (where applicable)

2.4.3 Assessment duration

Sufficient resources shall be allocated, including time, for personnel to carry out the assigned tasks in the assessment process. This includes time for the assessor to effectively perform assessment activities including but not limited to assessment preparation, execution and/or reporting activities to collate all the evidence required to deliver an accurate assessment report. If interpretation is required, this shall be arranged in advance.

It is estimated that on average, each assessment will typically have a duration of a full day (approximately 6-8 hours). In addition, assessors shall allow a minimum 1-1.5 hours to complete the final report and to review any documentation submitted after the assessment (for example, if requested purchase documents are held offsite and must be submitted via email). Please note that this is only an indicative duration for assessments, the time spent at each company may be different and depends on various factors. The assessor shall ensure that they complete the assessment in its entirety even if this means they spend more than the estimated time.

2.5 Onsite visit

An onsite assessment is used to obtain and evaluate objective evidence to determine the extent to which the organisation is following the requirements of the CoC Standard. During the assessment, the assessor shall review, observe, and inspect records, production processes, and storage units at each site.

2.5.1 Opening meeting

The assessment shall start with an opening meeting during which the assessor shall include but not limited to the following information:

- a. Provide a summary of how the assessment activities will be carried out and the time required.
- b. Confirm that all required documentation is available at the location the assessment is taking place or is otherwise easily accessible by electronic means.
- c. Confirm access to personnel and explain that workers shall be interviewed at their place of work where the worker feels comfortable and provides privacy.
- d. Explain the need to perform a site tour.

- e. The method of reporting, including the types and grading of any non-conformities that may be identified.
- f. Explanation of confidentiality and conflicts of interest.
- g. Confirmation of the language to be used during the assessment as well as any necessity for interpreters.

2.5.2 Interviews

The assessor shall interview responsible personnel (management and administrative staff and workers) to verify their competency in understanding and applying the relevant CoC Standard. When selecting personnel to be interviewed the assessor shall consider, but not be limited to, the following:

- a. The personnel responsible for the overall implementation of the CoC Standard.
- b. The personnel responsible for critical control points and areas of risk identified.
- c. Processing and handling activities in the operation during the assessment.
- d. The open non-conformities from previous assessments (if applicable).
- e. In case the activities at an organisation (e.g., ginner) depend much on the use of temporary and/or seasonal workers, the assessor shall make its best effort to have the highest estimated number of temporary and/or seasonal workers present during the onsite assessment.

The number of interviews carried out shall reflect the size of the organisation, the complexity of operations, and the range of staff who could affect the integrity of Better Cotton products. Interviews shall be used to determine if personnel understand the relevant process or procedure which ensures conformity with the CoC Standard.

The assessors shall consider the following aspects for interviewing workers:

- a. The assessor shall ensure that the management representatives shall not to be present during interviews of workers.
- b. The assessor shall ensure that the participants in the interview feel safe, secure, comfortable and their privacy is protected.
- c. Information about the interviews and the information obtained shall be recorded, but worker names can be withheld due to confidentiality. In these cases, a short description of the role is sufficient.
- d. Interview questions shall not be leading.

2.5.3 Documentation review and sampling

During an assessment, the assessor shall verify at least the following:

- a. Management plan
- b. Competence of the staff and temporary workers
- c. Training records for staff and temporary workers
- d. Processing records including conversion rate

- e. Traceability, purchase/sales procedures, and purchase/sales records
- f. Volume reconciliation records
- g. Contracts with subcontractors and details of the subcontracting activities (if applicable)
- h. For ginner only: gin agreement

For organisations applying a physically traceable model, the assessor shall conduct a traceability test. This traceability test shall seek to link the input of Better Cotton products with the outputs. This shall be done through reviewing lots or delivery records, internal traceability records and documents including handling and supply records and, where used, relevant documents involving subcontractors.

2.5.4 Site inspection

The purpose of the site inspections is to enable the assessor to observe the current practices in all areas of the site to form a view of how the practices meet CoC Standard requirements.

Site inspections shall cover, but not be limited to, locations where there are workers performing key processing activities directly involved in the scope.

While it is not necessary to always start the site tour following the order of the product movement across different stages, the assessor shall ensure that all critical control points are assessed.

The assessor shall conduct unstructured conversations/interviews with management and workers and seek site-based evidence to support findings.

The findings from the inspection will later be triangulated with evidence from management/worker interviews and document review.

2.5.5 Closing meeting

The closing meeting shall be conducted with the senior management including review of any NCs.

The closing meeting shall include but is not limited to the following elements:

- a. Explanation that the assessment process used a sample-based approach.
- b. The method and timeframe for the reporting.
- c. A short summary of strengths and good practices at the organisation, if applicable.
- d. Explanation of all assessment findings.
- e. The process for handling assessment findings, including any consequences.
- f. Timeframe for the organisation to respond to the assessment findings.
- g. Post assessment activities, such as (onsite) follow-up assessment if applicable and the possibility that assessment findings may be adjusted for any new information.
- h. Agree on when non-conformities will be solved and how the assessor will verify the implementation of corrective actions to confirm the closure of the non-conformities.

2.5.6 Assessment of Subcontractors

If during the assessment there are risks or concerns raised around the management of subcontractors and integrity risks identified, Better Cotton may require an assessment to be conducted of the subcontractor(s). If any non-conformities are identified at the subcontractor, they shall be raised against the organisation seeking to be verified against the Better Cotton Chain of Custody Standard v1.0 and shall be managed as per section 2.7 of this document.

2.6 Remote transaction monitoring

Remote monitoring of transactions seek to verify transaction records and transfer of physical Better Cotton and Mass Balance orders on the BCP. Remote transaction monitoring can be conducted for any supply chain actor. This means that remote monitoring can be carried out on ginners, traders, spinners, integrated spinners, fabric mills, vertically integrated mills, garment manufacturers, and sourcing agents. This monitoring will typically be conducted as a 2nd party activity meaning that Better Cotton staff will conduct the assessment.

2.6.1 Planning and preparation

The Better Cotton team will contact the organisation/facility via email to explain the purpose for remote monitoring of transactions, timeline for responding to the request, and the documentation required for transaction verification. The Better Cotton Team will also provide guidance on the types of documentation that need to be prepared to complete the remote transaction verification.

Typically, the Better Cotton Team member will select 5 to 8 transactions from the organisation/site's BCP account to assess as part of this activity.

The organisation/site shall respond to any requests within 10 working days. Organisations/sites can submit their records onto the Better Cotton Platform or via email.

2.6.2 Documentation review and sampling

During the monitoring the Better Cotton Team will review the corresponding records that will confirm the data as entered in the BCP is accurate and corresponds to a legitimate purchase or sale of cotton/ cotton-containing products. Examples of documents include:

- Invoices
- Delivery slips
- Contracts

For each transaction the Better Cotton team shall:

- a. Check whether the recipient of a digital transaction is the same as the direct buyer.
- b. Check the shipment date entered on the BCP against the shipment date on the document(s).
- c. Confirm dates and volumes are consistent across records and with BCP data.
- d. Confirm that transactions in the BCP can be linked to records via unique transaction reference numbers.

2.6.3 Results

The Better Cotton team will draft a report based on the findings from the monitoring and this shall be communicated to the organisation/facility. Reports shall be reviewed prior to being finalised and provided to the organisation/facility. Any non-conformities raised shall be handled as per the non-conformities section of this document.

It should be noted that a failure to respond to document requests or to provide corrective action may lead to a suspension of the organisation/facility from the BCP or from the programme more generally.

2.7 Non-Conformities and Corrective Action Plans

Any of the assessment or monitoring methods used by Better Cotton can result in non-conformities (NCs) being raised. The following section outlines details for how NCs will be raised and how they should be managed by the organisation.

2.7.1 Grading of Non-Conformities

The assessor shall classify NCs as follows:

- a. **Minor NC:** an isolated event that is limited in temporal and spatial scale, and where an effective internal management system was in place that should have prevented or detected the issue. A NC can also be graded as Minor if it does not result in a fundamental failure to achieve the objective of the relevant requirement.
- b. **Major NC:** if it results in, or is likely to result in, a fundamental failure to achieve the objective of the relevant requirement (either alone or in combination with other NCs). Major NCs typically continue over a period of time or are repeated or systematic in nature.

The assessor shall issue any non-conformities relating to deliberate fraud (including but not limited to altering any records related to claimed material by the organisation's personnel) as major NC.

The assessor shall report to Better Cotton within 24 hours if they detect any kind of unethical conduct from the staff representing the organisation, including the offering of bribes in any kind or cash. This will lead to negative assessment decision (see relevant section for details).

2.7.2 Corrective Action Plan

If during assessments or monitoring activities NCs are identified with CoC Standard requirements, the organisation shall submit their Corrective Action Plan (CAP) within 10 working days after receipt

of final assessment reports. The organisation shall correct these NCs within the specified timeframe below. If the organisation fails to submit their CAP within the timeline, Better Cotton will temporarily suspend their BCP account until it provides a valid reason for delay, or submits the CAP.

The CAP shall include a description of:

- The root cause of the non-conformity
- The corrective actions intended to correct the non-conformity.
- An appropriate timeframe to implement corrective action (within the timeframes outlined below)

Better Cotton will provide a template for completion of this information.

Minor NCs

Shall be corrected within 6 months or, for ginner, before the start of the next ginning season (whichever is shorter) and provide evidence to Better Cotton or the third-party assessor demonstrating how the issue has been addressed. If not addressed within 6 months or before the new season, a Minor NC shall escalate to a Major NC and the timelines for a Major NC shall be followed.

Major NCs

Shall be corrected within 30 calendar days of receipt of the final assessment report and provide evidence to Better Cotton or the third-party assessor demonstrating how the issue has been addressed. If not addressed within 30 calendar days, a Major NC shall lead to the suspension of their BCP account. The duration of a suspension period will be defined by Better Cotton considering the response to the NC.

The role of assessors is to ensure that organisations:

- are aware of the requirement of submitting CAP for their NCs.
- the information required in completing the CAP is sufficient.
- submit CAP to Better Cotton or the Third-Party Verifier within the required timeframe.
- are aware of the specified timelines for closing major and minor NCs, and the consequences of not meeting these NCs.

2.8 Assessment result

2.8.1 Assessment report

After each assessment, the assessor shall complete a report following the format specified in the Better Cotton CoC Assessment Report.

The report shall include the assessment findings (conformity and NCs) with description of required objective evidence(s) obtained during the assessment so that the reader understands the nature

and magnitude/impact of the findings. The assessment evidence (photos and copies of documents) that support or demonstrate the evidence description provided can be annexed to the report.

The assessment report shall typically be completed in English along with the non-conformities. However, where it is simpler to complete in the native language, the non-conformities as a minimum shall be in English.

Where a translator or interpreter was present at the assessment their name shall be listed on the assessment report.

For third-party assessors: All assessment reports are to be completed and submitted to the local Better Cotton Supply Chain team within 10 working days of completing the assessment. The assessor shall submit her/his first report to Better Cotton for review before continuing other reports. This is to ensure that the quality of report is acceptable and that any feedback is incorporated before replication. All reports shall go through a technical review process by a competent individual or team that were not involved in the assessment prior to being finalised. This reviewer can be an employee of the Third-Party Verifier. The assessor shall send the final report to the company within 4 weeks of the last day of the assessment, copying the Better Cotton Supply Chain team.

For Better Cotton staff: All reports are to be completed within 10 working days of concluding the assessment. The assessor shall submit their first report to another Better Cotton staff member who is a competent reviewer to perform the quality review of the draft report, covering the required data and evidence, and grading of NCs. All reports shall go through a technical review process by an competent individual or team that were not involved in the assessment prior to being finalised. The assessor shall send the final report to the company within 4 weeks of the last day of the assessment.

2.8.2 Assessment decision

POSITIVE DECISION

A positive decision shall be issued to the organisation that has successfully completed the assessment to the satisfaction of the assessor that they demonstrate their ability in meeting the requirements of the CoC Standard. This includes:

- a) Any Major NCs are addressed within the 30 days' timeline.
- b) The number of NCs is less than the allowable number outlined in this document.

A positive decision may also lead to a change in category for the organisation/site.

NEGATIVE DECISION

A negative decision shall be issued to the organisation that exhibits fundamental failure to achieve the objective of the CoC requirements, which includes the following cases (please also refer to table 1):

- a) A Major NC has not been corrected within the specified timeframe.
- b) Multiple NCs were identified, suggesting a fundamental lack of compliance with the CoC Standard.

- c) Better Cotton or a designated third-party assessor has evidence of a NC that was induced purposefully, grossly negligent, systematic, and/or which imposes a severe reputational risk to Better Cotton stakeholders.
- d) No response to submit a CAP within specified time period of receiving the final assessment report and CAP template.

Where an assessment is conducted by a Third-Party Verifier, they shall have the ultimate authority for the decision made.

In addition, Better Cotton retains the right to suspend use of the BCP at any time if Better Cotton or a designated third-party assessor has detected any kind of unethical conduct which may include bribery or fraud.

Table 1 - Assessment decision based on level of compliance with CoC requirements and other risk factors.

Minor	Major	Assessment decision	Timeline
≤10		Positive result	NCs to be corrected within 6 months
>10		Negative result*	Full re-assessment required. Existing BCP users will have their account suspended immediately and initial sites will not be allowed to enter the programme
≤5	≤5	Positive result	NCs to be corrected within 30 calendar days
	>5	Negative result*	Full re-assessment required. Existing BCP users will have their account suspended immediately and initial sites will not be allowed to enter the programme

**For Ginners – Better Cotton reserve the right to review the assessment decision and determine future participation levels in the Better Cotton Chain of Custody Programme.*

2.8.3 Appeals and Complaints

The organisation/facility shall have the option to appeal any decision made because of assessment and monitoring activities.

Better Cotton shall acknowledge the appeal within 10 working days of receipt and keep the appellant informed of the progress in evaluating the appeal until it is closed.

Complaints received shall be handled as per the Better Cotton [Complaints Policy](#).

2.9 Combination assessments

Where possible, and appropriate, the organisation may combine their Better Cotton CoC Assessment with other on-site assessments that are recognised by Better Cotton.

Better Cotton shall provide a list of recognised Standards and will continually monitor and update those lists of standards.

Where an organisation is assessed and approved by other standards recognised by Better Cotton this may be used as a demonstration of conformity with the Better Cotton CoC Standard and may be recognised as equivalent to an assessment against the CoC Standard. If there is a negative result in one of these assessments, it may also result in a negative decision for the Better Cotton programme.

Better Cotton may require that certain additional requirements from the Better Cotton CoC Standard are also assessed before acceptance. This will be at the discretion of Better Cotton. The organisation shall continue to add relevant transactions to the Better Cotton Platform irrespective of the assessment method used.

Additionally, where an organisation is assessed and approved by other standards recognised by Better Cotton this may be reflected in the risk category assigned during the enrolment process.

3 On-going Monitoring, Compliance and Assessment Cycles

3.1 Annual internal reviews

As per section 2.9 of the CoC Standard v1.0 all organisations are required to complete an annual internal review. This shall be conducted irrespective of the category assigned to the organisation/facility. The internal review shall be completed using a tool provided by Better Cotton and shall be submitted to Better Cotton. Better Cotton may evaluate the internal review and request further information on the outputs of the internal review. Failure to cooperate with Better Cotton requests shall result in a temporary suspension from the BCP until the information is provided. If the information provided is of poor quality or raises concerns, Better Cotton may request further information and conduct additional monitoring.

3.2 Monitoring and compliance

In addition to the assessment methods outlined; Better Cotton shall conduct continuous monitoring of organisation/facilities that are part of the CoC programme.

The methods of monitoring include, but are not limited to:

- Document reviews
- On-site assessments
- Tracebacks
- Transaction verification
- Spot check visits
- Physical tracers

Document reviews

As part of entering transactions into the BCP, organisations will be required to upload certain documentation to verify the transactions being made. Better Cotton will review samples of these documents on an on-going basis to verify the transactions being made.

On-site assessments

These would be conducted as per section 2.4 of this document. Better Cotton reserves the right to contract a Third-Party Verifier to conduct an on-site assessment in response to a potential risk to the Chain of Custody. This might be an assessment against the full Better Cotton Chain of Custody Standard v1.0 or focus on certain sections of the Standard. The assessment might be conducted

unannounced or at short notice. If the organisation is found to be at fault for any issues raised, the organisation may have to pay the cost of the assessment.

Traceback

A traceback exercise aims to trace verified products through the supply chain back to the gin or country of origin by reviewing traceability documents from the full supply chain.

Transaction Verification

Similar to a traceback, transaction verification is a process to detect, investigate and ultimately prevent the risk of false claims about products in specific supply chains.

It aims to verify that recorded purchases and sales data match with the data reported by their trading partners. This allows volume mismatches to be uncovered between trading parties across a supply chain. If the numbers do not match, there is a high probability that the supply chain actor has added products that do not conform to the CoC Standard and is trading conventional cotton products as physical Better Cotton.

Spot Checks

Better Cotton reserves the right to conduct short-notice spot checks at organisations’ site or facility in the event of a complaint and/or incident. Any findings raised shall be handled as per the non-conformities section of this document. There might be legal and logistical challenges in the implementation of short-notice assessments. Hence, subject to practical arrangements required relating to legal or logistic challenges, Better Cotton or the 3rd Party Verifier shall inform the organisation about the assessment at least 3 working days in advance.

Additive and Forensic Tracers

Tracer technologies are solutions that analyse the microparticle composition of fibres, materials, and finished products (forensic tracers), or apply tracer substances at a certain point in the supply chain, to be detected later to verify origin (additive tracers). Better Cotton may use this option in response to integrity issues and will provide guidance to organisations and verifiers involved with implementing these systems.

	Segregation (Single Country)	Segregation (Multi-Country)	Controlled Blending
Isotope / DNA testing hypotheses	Does the origin of the physical Better Cotton listed for the product match the reference library fingerprint	Do the origins of physical Better Cotton listed for the product match the reference library fingerprint	Does the product contain high risk origins?

Forensic testing hypotheses x CoC models

It is at the discretion of the Better Cotton team when these monitoring methods are used and may be done as a random sample or in response to an integrity issue.

The monitoring could result in non-conformities (which shall be handled as per the non-conformity section of this document) when issues are identified that show CoC Standard requirements are not being met or to a suspension where there is evidence of a demonstrable breakdown in the Chain of Custody or evidence of intentional fraudulent activities.

If there is evidence from the monitoring activities that the organisation/facility is at fault they may be responsible for the cost of the monitoring activity(ies). Better Cotton shall provide an estimate of the costs involved prior to conducting the monitoring.

3.3 Assessment cycles

The assessment cycle for organisations/facilities in the Better Cotton supply chain programme is typically 3 years and the levels of monitoring vary depending on the risk factor or supply chain models being applied.

Physical Segregation Model (Single Country, Multi-Country, Controlled Blending)

Category	Year 1	Year 2 ³	Year 3 ³
Category A	Assessment at least once across the 3-year period		
Category B	On-site Assessment within 12 months of entry to the programme	Part of on-going monitoring procedures	Part of on-going monitoring procedures
Category C	On-site 3 rd Party Assessment before entry to the programme	Remote or on-site Assessment	Part of on-going monitoring procedures

It should be noted that the type of assessment can vary if a negative decision is reached or if heightened risk factors have been identified in the organisation/site.

The Better Cotton team shall assess the situation of the organisation at the end of their 3-year cycle and shall recommend what level of assessment is required.

³ Based on a positive decision in the previous year

3.4 Suspension and consequences

Better Cotton reserves the right to suspend organisations/sites from the CoC programme.

The following reasons (but not limited to) can be causes for suspension from the programme:

- Failure to close out non-conformities from monitoring activities.
- Failure to cooperate with Better Cotton or approved 3rd party assessors in monitoring activities.
- For medium risk organisations, a failure to have an assessment within 12 months of entering the programme.
- Demonstrable breakdown in the Chain of Custody.
- Evidence an organisation has sold products as physical Better Cotton when they are shown to not be Better Cotton either by origin or another claim.
- Breaches in other Better Cotton processes including, but not limited to:
 - Membership Requirements
 - Claims Requirements
 - BCP T&Cs and misuse of the BCP
- Issues that may bring Better Cotton into disrepute.
- Unethical behaviour (bribery, corruption, etc.).

The period of suspension shall be determined by Better Cotton along with actions required to lift suspension. Failure to take acceptable actions to correct the cause of the suspension may result in the organisation being removed from the Better Cotton programme and they shall be required to re-enter via the registration and on-boarding process. The following page describes the typical suspension periods.

Typical suspension periods

Issue	Timeline of suspension (minimum)	Corrective Action
>10 Minor NCs	3 Months or until re-assessment, whichever is longer. For Ginners - 3 months of a season	Re-assessment (positive decision)
>5 Major NCs	3 Months or until re-assessment, whichever is longer. For Ginners - 3 months of a season	Re-assessment (positive decision)
Failure to close out non-conformities from assessment/monitoring activities in required timeframe	3 Months or until non-conformities are closed. For Ginners – 6 months of a season	Effective close out of non-conformities as per severity (Minor or Major)
Failure to cooperate with Better Cotton or approved 3 rd party assessors in assessment/monitoring activities	6 Months For Ginners – 6 months of a season	Assessment/Re-assessment (positive decision)
Category B organisations - a failure to have an assessment within 12 months of entering the programme	Until an assessment/re-assessment is conducted	Assessment/Re-assessment (positive decision)
Demonstrable breakdown in the Chain of Custody	6 Months For Ginners – 6 months of a season	Assessment/Re-assessment (positive decision)
Evidence an organisation has sold products as physical Better Cotton when they are shown to not be Better Cotton either by origin or another claim	12 Months	Re-application to the programme and then Re-assessment (positive decision)
Issues that may bring Better Cotton into disrepute	12 Months	Re-application to the programme and then Re-assessment (positive decision)
Suspended twice in a 12-month period	12 Months	Re-application to the programme and then Re-assessment (positive decision)
Unethical behaviour or deliberate fraud	2 Years	Re-application to the programme and then Re-assessment (positive decision)
Breaches in other Better Cotton processes including, but not limited to: a. Membership Requirements b. Claims Requirements c. BCP T&Cs	As per relevant procedure	As per relevant procedure

During the suspension period the following rules shall apply:

- The organisation cannot buy or sell Better Cotton products or BCCUs in the period of suspension.
- If the organisation has already made a sale or purchase prior to the suspension but has not entered onto the BCP, the organisation shall have 10 working days to enter these transactions and provide supporting evidence to the Better Cotton team to verify these transactions. Failure to adhere to these requirements shall lead to the transactions being rejected.
- The organisation shall inform their customers within 5 working days of their suspension.
- If a re-assessment is required, the cost shall be borne by the suspended organisation. Re-assessments shall be organised by the Better Cotton Supply Chain Team.

3.5. Extension to Scope

Where an organisation wishes to extend their scope and add new CoC models they shall contact Better Cotton prior to adding the new CoC model(s). For those that are only operating the Mass Balance model and wish to add a physical segregation model the process referenced in section 2.1 – 2.3 of this document shall apply. As a minimum the organisation shall be required to submit a new Registration Form and typically an on-site assessment would be required prior to purchase or sales of any products with a physical CoC model.

3.6. Claims

Any claims made shall adhere to the Better Cotton Claims Framework and/or the Better Cotton Supplier and Manufacturer Member Claims Toolkit. Claims may be reviewed as part of assessments conducted and any violations may be raised with the Better Cotton Claims team or as non-conformities. Where non-conformities are raised, they shall be managed as per section 2.7 of this document.

3.7. Notification of Changes

As per section 2.3 of the Better Cotton Chain of Custody Standard v1.0, the organisation shall communicate any changes in the management representative, or any other significant changes to Better Cotton by email within 15 calendar days of the change occurring. This shall include if a registered ginner stops processing Better Cotton mid-season temporarily or permanently for the remainder of the cotton season and has leased out the site to another ginner for processing conventional cotton. The ginner shall communicate this to Better Cotton within 15 days of the change occurring. This type of change can be communicated by email.

3.8. Derogations

The Better Cotton Chain of Custody Standard is designed for global applicability and considers different supply chain categories in its design. Nonetheless, Better Cotton recognises that in some exceptional circumstances, a requirement of the Better Cotton Chain of Custody Standard may not be relevant or applicable in a specific local context. In addition, Better Cotton supply chain organisations may at times be faced with unexpected or structural circumstances which prevent full compliance.

To account for these situations, Better Cotton has developed a process for supply chain actors to request a derogation for a specific requirement or set of requirements.

This process is applicable only if:

1. There is clear evidence to support the argument that a requirement is not applicable or is not relevant in the local context; or

2. There is clear evidence of unexpected or structural circumstances (e.g., natural disasters) which prevent full compliance

In such situations Better Cotton shall follow a determined Derogation Process to consider the requests. Any derogations shall be listed on the Better Cotton website <https://bettercotton.org/document-library>. Better Cotton will ensure this information is shared with third-party verifiers and assessors.

3.9. Ad-hoc Requests

Where individual organisations seek to deviate from any of the requirements in the Better Cotton normative documents they shall submit an ad-hoc request to the Better Cotton team. These requests shall be made via email to compliance@bettercotton.org or to the relevant country team. The request shall include:

- The requirement which they are seeking to deviate from
- The justification for the deviation

The Better Cotton team shall review the ad-hoc request and provide a response. The response shall include any conditions and timeframe for the deviation. If approved, the ad-hoc request shall not necessarily create a precedent so if a similar situation arises for the organisation in the future, they shall be required to submit another ad-hoc request.

The Better Cotton team shall review if the scenario could apply to multiple organisations and in such circumstances shall issue a derogation and shall communicate this to all organisations in the programme.

3.10. Better Cotton Rights

Better Cotton reserves the right to issue and amend the content and requirements stated in this document or any other normative documents that relate to the Better Cotton Chain of Custody programme. All organisations shall be informed of any changes and shall be given a timeframe to implement those changes.

Better Cotton has overall ownership of the BCP and reserve the right to reject applications to the Better Cotton Chain of Custody Programme and to suspend organisations as per the relevant sections of this document. The Better Cotton Chain of Custody Standard is a voluntary standard which organisations may opt in to. Better Cotton is not liable towards organisations for any direct or indirect damages arising out of or in connection with use of the BCP or suspension from the use of the BCP for any reason, unless the damage arises out of or in connection with Better Cotton's intentional or gross negligent conduct.

4 Transactions and Interaction with the Better Cotton Platform

The Better Cotton Platform (BCP) is a centralised digital tracking system owned by Better Cotton, and used by manufacturers, suppliers, retailers, and brands to document and make claims about their Better Cotton sourcing activities and sourced volumes.

To enter purchases, production (where applicable) and sales of Better Cotton, ginners and supply chain organisations are required to use the BCP. The BCP allows transactions of physical Better Cotton or Mass Balance orders through the transaction of Better Cotton Claim Units (BCCUs).

Better Cotton assigns account types based on the organisation's buying and selling activities. Account types include ginner, trader, spinner, integrated spinner, vertically integrated spinner, non-lint trader, fabric mill, vertically integrated mill, end-product manufacturer, sourcing agent, and retailer/ brand. Only the registered users shall interact with the BCP, user details shall not be shared with any other person/organisation.

Use of the BCP is mandatory for all Better Cotton transactions, whether physical or Mass Balance.

All organisations using the Better Cotton Platform shall be required to sign the BCP Terms and Conditions. The BCP Terms and Conditions can be found on the BCP.

4.1 Responsibilities

Every site within an organisation shall have a separate BCP account to enter transactions.

Organisations shall identify a designated representative for recording relevant data on the Better Cotton Platform (BCP). Organisations shall not give access to the BCP to other third parties.

All staff responsible for entering data on the BCP shall complete BCP training provided by Better Cotton or approved third party providers.

The organisation shall ensure that the designated representative's contact details are kept updated on the BCP. If the organisation needs to change the designated representative for any reason, they should contact the Better Cotton team via helpdesk@bettercotton.org.

The organisation shall record actual production input and output volumes of all physical Better Cotton product on the BCP.

The organisation shall only make entries into the BCP where there is a corresponding transfer of physical cotton-containing products. This applies to both physically traceable Better Cotton and Mass Balance BCCUs.

Relevant records and documentation for each transaction shall be retained as per the Better Cotton Chain of Custody Standard v1.0.

The organisation shall review the details of the transaction on the BCP for accuracy prior to submitting and/or accepting the transaction.

4.2 Timelines

It is expected that organisations will interact with the BCP in a timely manner including:

For Ginners:

- Better Cotton seed purchase transactions are entered within 30 calendar days of receipt.
- Lint productions are entered within 30 calendar days of being produced.
- Sales transactions of Better Cotton lint are entered within 30 calendar days of the shipment date.

For all other organisations:

Physical Models

- Purchase transactions should follow the flow of the physical Better Cotton in real life. Transactions shall not be accepted until the physical product has been received by the organisation.
- Purchase transactions shall be acknowledged within 60 calendar days of data being entered into the BCP, otherwise the purchase transaction will be automatically withdrawn by the system.
- Sale transactions shall be edited within 60 calendar days of a Request for Change, otherwise the sale transaction will be automatically withdrawn by the system.

Mass Balance

- Purchase transactions shall be acknowledged within 60 calendar days of data being entered into the BCP, otherwise the purchase transaction will be automatically withdrawn by the system.
- Sale transactions shall be edited within 60 calendar days of a Request for Change, otherwise the sale transaction will be automatically withdrawn by the system.
- Sale transactions shall be entered within 60 calendar days of the shipment date. For Ginners they shall be entered within 30 calendar days of the shipment date.
- Fabric Mills – If they fulfil a Better Cotton Order from their direct buyer, who is an end-product manufacturer, but they need to transfer BCCUs to the end buyer instead e.g., retailer



or brand, then the names of the end-product manufacturer/direct buyer shall still be entered into the transaction reference box in the BCP. A unique document reference requested by the retailer/ brand (e.g., purchase order, contract, or invoice number) for the shipment shall also be included in the entry to confirm they agree with this arrangement.

- End-Product Manufacturers - If they fulfil a Better Cotton Order from a sourcing agent, but they need to transfer BCCUs to the end buyer instead e.g., retailer or brand, the names of the sourcing agent/ direct buyer shall still be entered into the transaction reference box in the BCP. A unique document reference requested by the retailer/ brand (e.g., purchase order, contract, or invoice number) for the shipment shall also be included in the entry.

If issues are identified with a transaction that has been acknowledged by the customer, then any organisation (including ginners) can request a cancellation of the transaction. This cancellation must be requested within 30 days of entering the transaction onto the BCP. This cancellation request shall be reviewed by the Better Cotton team and consideration shall be made if the cancellation can be accepted. If the transaction has not yet been acknowledged by the customer, then it can be withdrawn. If the transaction needs to be cancelled after 30 days of being entered into the system, then a request for cancellation shall be made to the Better Cotton team. This cancellation shall include reasons for the cancellation and confirmation from the customer of the request. The Better Cotton team reserve the right to reject any cancellation request(s).

Any deviation from the timelines listed here shall be processed as an ad-hoc request and follow the requirements in section 3.9 of this document.

4.3 Ginner Inventories and Annual Authorised Volumes (AAV)

The AAV code is a unique number generated by Better Cotton for licensed Producers (Large Farms or Producer Units). AAV codes allow ginners buying from licensed Better Cotton Farmers to enter purchases of seed Better Cotton into the Better Cotton Platform (BCP) and allocate the volumes back to the corresponding Producer. It should be noted that the AAV provides an estimate of seed Better Cotton available to the ginner. Any transaction between the ginner and the producer shall have corresponding physical Better Cotton associated to it. During the season, the Better Cotton team shall receive actual harvest volumes and may revise the total seed Better Cotton inventory available under each AAV.

All ginner inventories are 'zeroed out' in the BCP at the end of the season. Ginners' lint cotton inventories increase as they enter their production of Better Cotton lint into the BCP. As they enter sales of Better Cotton bales into the BCP, buyers will acknowledge the transactions, and these inventories are decreased accordingly. When Better Cotton bales are sold as conventional cotton, there are no entries made into the BCP to reflect this deduction in real inventory terms. To eliminate the discrepancy between a ginner's actual (physical) Better Cotton lint inventory and its cotton lint inventory in the BCP, Better Cotton resets all ginner inventories back to zero prior to the beginning of a new cotton crop season. The timing of this 'zeroing out' differs by country, depending on the cotton crop season. Each year, Better Cotton informs ginners, by e-mail, one month prior to actual

zeroing of their cotton lint inventories from the BCP. Ahead of this deadline, ginners are expected to enter all Better Cotton sales into the BCP.

4.4 Document Uploads

For each transaction entered onto the BCP involving physical Better Cotton, the organisation shall upload supporting documentation to verify the transaction. The documents may include, but not limited to, the following:

- Invoices
- Transport and/or shipping documents
- Government issued sales or value added tax receipts for the claimed materials.

The document uploaded shall include a unique reference that facilitates the tracing of the product from receipt through to sale and matches the transaction reference entered onto the BCP, supporting the details of the transaction with respect to volumes entered.

The Better Cotton team may review random samples of documentation uploaded to verify the transaction. A sample of the documents shall also be sampled as part of any other assessment activity on the organisation. Failure to upload appropriate documentation shall lead to consequences as per section 4.5 of this document.

4.5 Consequences

Organisations shall adhere to the relevant requirements within the Better Cotton Chain of Custody Standard v1.0 as well as those included in this document. Failure to adhere to these requirements relating to the BCP may result in actions being taken by the Better Cotton team including, but not limited to:

- Suspension of BCP account
- Cancellation of transactions
- Removal of inventory (this is in addition to any zeroing of inventory done of the ginner)

It should be noted that, for many of the timelines referenced in section 4.2 of this document, the BCP may automatically reject transactions that exceed the timelines listed.

4.6 Publicly available information

Better Cotton shall make available information relating to organisations that are within the programme and the current level of verification that has been applied. This shall also include the CoC model that has been applied to the organisation.



Upon request Better Cotton can make available a list of organisations that have withdrawn from the programme within the last 2 years including the date of withdrawal.

4.7 Updates

Better Cotton reserve the right to update the BCP at any time. Notification shall be provided to organisations in advance of any updates, and this shall be communicated either via the BCP itself and/or via email.

5. Verifier and Assessor Competence

5.1. Conflict of interest and Impartiality

The Third-Party Verifier shall have mechanisms to ensure that conflicts of interest are avoided with organisations they are assessing. The Third-Party Verifier shall also ensure impartiality is retained in all activities related to monitoring and assessments.

5.2. Competency

All Third-Party Verifiers shall be registered and approved by Better Cotton prior to undertaking any assessments against the CoC Standard.

All assessors used by the Third-Party Verifier shall meet the competency requirements stipulated by Better Cotton and are approved by Better Cotton to conduct assessments.

Second-Party verifier requirements

All second-party assessors shall be employed by Better Cotton and required to meet the personnel requirements below.

Personnel competency

Competence is defined across three different activities:

1. Assessor: the person undertaking the monitoring activity against a prescribed standard or procedures.
2. Reviewer: A person, or group of persons, (e.g., a committee that has not been involved in the assessment process and is assigned to review all the information and results related to an assessment).
3. Decision maker: A person, or group of persons that has not been involved in the assessment process and is assigned to make the decision. This may or may not be the same person or group of persons as the reviewer.

Competencies - General

The assessor must demonstrate ability to apply knowledge and skills in the following areas:

- a. The objectives and core processes of the Better Cotton system, including the requirements of the Better Cotton CoC Standard.

Education

Assessors must have knowledge corresponding to at least a secondary education that includes or is supplemented with courses related to activities within the cotton industry or agriculture, horticulture and related industries.

Work experience

The following are minimum work experience requirements for assessors of the CoC Standard:

- Minimum of three years full-time related working experience within the cotton supply chain
- May be reduced by one year if the assessor has completed a tertiary education appropriate and relevant to the cotton supply chain and related industries.

Training

The following are minimum requirements for assessors, reviewers and decision makers operating in the CoC programme:

- Successful completion of a lead auditor training course
- Successful completion of Better Cotton training

Assessment experience

Additionally, to maintain their qualification as a Better Cotton assessor, reviewer or decision maker, there shall be a system of monitoring of assessor performance which is a combination of:

- Ongoing review of assessment reports
- Client feedback
- Witnessed assessments.

Full details on Third Party Verifier requirements and approval procedures can be found on the Better Cotton Website.