

REEL COTTON CODE VERSION 3.1
AND REEL REGENERATIVE CODE VERSION 1.1

RESULTS OF STAKEHOLDER CONSULTATION JUNE 2023



In June 2023, CottonConnect conducted a stakeholder consultation on the draft of REEL Cotton Code version 3.1 and REEL Regenerative Code version 1.1. The stakeholder identification process aligned with ISEAL's Standard Setting Code of Good Practice. Key stakeholder groups included directly affected stakeholders (those who will be impacted by implementation of the Code), indirectly affected stakeholders who have an interest in the application of the standard, and subject matter experts. Stakeholders had suitable and accessible mechanisms for participation in the process.

Stakeholders consulted

Stakeholders from seven different sectors were invited to participate in the review and feedback process. These sectors include:

- i. Impact measurement/ certification bodies
- ii. Cotton farmers /producers
- iii. International/convincing organisations on sustainability
- iv. Implementing partner/civil society
- v. Academic/research institutes
- vi. Supply chain
- vii. Brands and retailers

The consultation received 10 responses via written replies to the consultation questionnaire and notations to the draft Codes.



Synopsis of comments and revisions



FEEDBACK ON FORMATTING OF THE CODES

- The relation between some aspects in the code are unclear, with conducts sometimes duplicated or contradictory.
- References from one conduct to another should be introduced where applicable to be aware and clearer about interconnected conducts.
- Some background information might be introduced to the code (e.g. outline of training content).

ON NEW REQUIREMENTS (1.5.2) FOR INCREASED POLICIES, PROCEDURES AND RESPONSIBILITIES FOR CERTAIN CHAPTERS OF THE CODE.

Stakeholders recognise the practical importance of preparing policy documents tailored to field requirements to keep the team informed and aligned. They refer to Code 1.5.2 in support of this.

ON THE UPDATED LIST OF PROHIBITED CHEMICALS (4.2.2.2) MEET CURRENT AND UPCOMING REGULATIONS.

Stakeholders agree that the updated list of prohibited chemicals will meet current and upcoming regulations and is very important.



FEEDBACK ON REEL COTTON CODE CRITERIA

- Stakeholders find the requirements of the REEL codes are appropriate and practical for farmers. However, they acknowledge the challenges associated with successful implementation. In the long run, farmers stand to benefit greatly from the successful implementation of these practices.
- Stakeholders note that the use of organic manure and compost alone may not fully meet the high nutritional demands of cotton crops, and there may be challenges in sourcing the required quantities of organic manure and compost from the market.
- There is a suggestion to clearly define the boundaries for the implementation of practices such as Integrated Nutrient Management.
- Stakeholders recommend establishing self-sustainable initiatives focused on important sustainable practices.
- Stakeholders appreciate the strong emphasis on sustainable water use in the code.



FEEDBACK ON REEL REGENERATIVE CODE CRITERIA

- Stakeholders emphasise the importance of codes addressing biodiversity for environmental benefits, as they believe that farmers can maximise their gains through biodiversity enhancement.
- Stakeholders express the need for further exploration of the practical benefits and implications of deep tillage and summer ploughing in Regenerative practices.
- There is a question regarding the basis for assessing the toxicity levels of pesticides.
- Stakeholders propose the development of a biodiversity assessment tool and monitoring system to track improvements over time.
- There is a comment that Section 11 in the REEL Regenerative Code seems to be a later addition without a clear reference to the other conducts.
- There is a comment that the role of soil sampling and nutrient balance could be made clearer (how is it considered, what is required, what is recommended etc.)
- Stakeholder recommend that the REEL Regenerative Code should clearly indicate the conducts that are added or are different than those of the REEL Cotton Code (3.1)



FEEDBACK ON UNINTENDED CONSEQUENCES OF THE REEL COTTON PROGRAMME

Stakeholders suggest that the unintentional loss of endangered plant species could be addressed through the implementation of intercropping, mixed cropping, or relay cropping systems in cotton fields. These practices may contribute to the enhancement of agro-biodiversity.



FEEDBACK ON MONITORING, EVALUATION AND LEARNING

Stakeholders were invited to provide their comments and feedback based on specific leading questions regarding the MEL (Monitoring, Evaluation, and Learning) system and the overall system. In summary, the feedback included:

- It is recommended to provide clear definitions of different types of audits to enhance external stakeholders' understanding.
- The Code exhibits a well-defined chain of custody for data, along with robust safeguards to protect the information.
- The monitoring, evaluation & learning (MEL) mechanism is well-defined; however, it is advisable to gather objective evidence such as land records and farmers' identification to validate the authenticity of the data.
- Conducting annual third-party verifications is recommended to ensure rigorous monitoring and compliance.
- In addition to the stated auditor qualifications, it would be beneficial to include a criterion for auditors to be proficient in speaking and understanding the local language or being able to effectively communicate with auditees.

How feedback is addressed in revised Codes



1. During this year's revision process, six new requirements have been introduced, four requirements have undergone rewording or updates, and one requirement has been removed.
2. New requirements (1.5.2) for increased policies, procedures and responsibilities for certain chapters of the code are adopted in the Code.
3. The updated list of prohibited chemicals (4.2.2.2) meet current and upcoming regulations is adopted in the Code.
4. Suggestions related to the REEL Cotton and REEL Regenerative Codes have been accepted and incorporated in the development of training, such as assessing the toxicity level of pesticides and boundaries of integrated nutrient management.
5. The list of unintended consequences of the REEL Cotton Programme has been updated.
6. How MEL feedback is addressed – [The REEL Cotton Code of Conduct, Data Collection and Verification Process](#) provides definitions for various types of audits and is shared with relevant stakeholders. CottonConnect collects land details as part of the farmer list and each year confirms and updates the land area to ensure it aligns with any changes. The farmer list is regularly shared with internal and external auditors and an external data validation team for verification purposes.

CottonConnect maintains a robust verification system that includes both first-party and second-party verification annually. Therefore, it is advisable to engage a third-party auditor every alternate year. The auditor criteria have been updated to include language requirements for auditors or the option to use a translator, ensuring effective communication during the audit process.

Outcome

REEL Cotton Code version 3.1 and REEL Regenerative Code version 1.1 will be published at cottonconnect.org on October 2023 and replace previous versions in implementation from December 2023.