



REEL Cotton Code of Conduct, Data Collection and Verification Process



Cotton grown in the REEL Cotton Programme is verified by the REEL Cotton Code of Conduct (CoC) and is proven to increase yields and farm profits; while reducing environmental impacts.



The REEL Code verifies that farmers in the REEL Cotton Programme are using sustainable practices, with added elements that ensure traceability and decent work.



The impacts of adopting the REEL Cotton CoC are measured through increased yield, increased profit, reduced water usage, reduced chemical fertilisers and pesticides usage and reduced input cost.



Adherence to the REEL Cotton CoC in the REEL Cotton Programme is verified internally by the local implementing partner and CottonConnect's Monitoring, Evaluation & Learning (ME&L) team and externally by a third party, FLOCERT, the organisation that provides Fairtrade International certification.



The data collected under the REEL Cotton Programme is also validated by an external auditor, Peterson and Control Union.



CottonConnect follows the industry best practices for the development and measurement of the impact of the REEL Cotton CoC.

The REEL Cotton Code of Conduct

The CottonConnect REEL Codes of Conduct were developed to ensure that agricultural training programmes follow best practices and create the right outcomes – not only for farmers and their communities but for the planet.¹

The REEL Cotton Programme was created in 2010 by CottonConnect as a three-year agricultural programme providing farmers with training on sustainable cotton practices. In 2015, FLOCERT was appointed to translate the REEL Cotton Training Programme into a 3rd party verification Code of Conduct.

The development of the REEL Cotton Code included many elements of standard-setting good practice, including a comparative analysis of five different sustainable agriculture standards, risk analysis, a pilot of the code prototype, multi-stakeholder consultation, and regular revisions.

The 2016 revision of REEL Cotton Code leading to Version 2.0 included strengthening the social criteria on employment conditions and health and safety. The 2021 revision of REEL Cotton Code leading to Version 3.0 included recommendations from a survey conducted with farmers and implementing partners; a review of the Delta indicators for sustainable cotton; enhanced health and safety for gins; and region-specific customisations. The revision included a stakeholder consultation in August 2021.

The periodical revision is based on ISEAL Standards and Assurance Requirements, lessons learned and emerging program requirements.

1. The inputs and outcomes of the REEL Cotton Programme are detailed in the [REEL Cotton Theory of Change](#).





Data Collection and Validation

The implementation of REEL Cotton CoC starts at the farm level with the enrolment of farmers. The major aspect under farm level compliance is the farmer training which ensures the farmers are trained on all relevant conducts required by the CoC, as outlined in the [REEL Cotton Programme Handbook](#). Based on the conducts listed in the REEL CoC, training modules are prepared and periodically updated. The data for each farming stage is recorded in the Farmer Field Book (FFB).

The data collected is first internally verified by the local partner and CottonConnect farm team. The second level of internal verification is done by the CottonConnect ME&L team. The internally verified data is then validated by an external auditor, Peterson and Control Union. The validation process by the external auditor involves onsite farm visits, interviews with the farmers and cross-verification of the information recorded in the FFB with supporting documents.

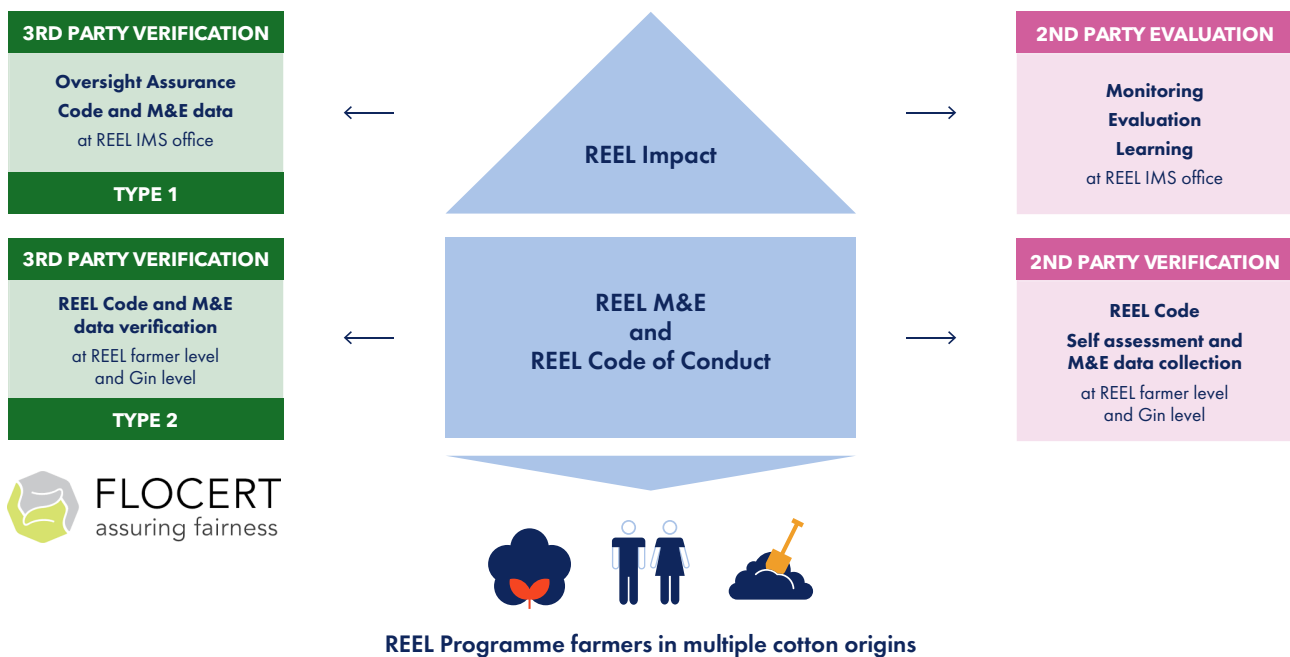
Any deviation between the FFB data and data collected by the external auditor during the auditing process is shared with the CottonConnect team. Based on the report, a corrective action plan for any critical findings is created and implemented by the farm team and regularly monitored by the ME&L team.

The FFB data is further used to prepare the impact claims achieved in the programme (defined KPIs). The data validation is carried out every year for the programme farmers to measure the impact of the programme in that season.



Programme Verification Process

VERIFICATION ARCHITECTURE REEL COTTON PROGRAMME



The verification process ensures adherence of programme activities to all the REEL Code criteria as defined in the Code of Conduct. The process is carried out by internal teams and external experts.



1. INTERNAL VERIFICATION SYSTEM – First-Party and Second-Party Verification

The first-party verification, also known as self-assessment, is done by the local partner where they audit a process or set of processes in the quality management and implementation of the programme to ensure it meets the requirements of the REEL Cotton CoC. The ME&L team of CottonConnect does the second-party verification to reassure the programme meets the REEL Cotton CoC requirements. The assessment covers the implementation body, including CottonConnect's farm team, the local partner, farmers being trained under the programme, and ginners participating in the programme.



2. EXTERNAL VERIFICATION – Third-Party Verification

CottonConnect works with FLOCERT for the third-party verification of the REEL Cotton programme. All customers who make claims have a year two verification in a three-year programme. FLOCERT conducts the third-party verification where it cross-checks implementation, documentation, and system via data collected by auditors in correlation to REEL Cotton CoC, which helps to minimise efforts, increase ownership, and maximise credibility.



FLOCERT
assuring fairness

The verification by FLOCERT is done at two levels:

- Type A: relevant verification at the implementation body level (local partner and CottonConnect)
- Type B: relevant verification of farmers and gins.

Under the verification of implementing body, validation of documents related to the internal management system (agreements, etc.), training materials, registers and other documentation required under REEL Cotton CoC are cross-verified through the interviews of local partner staff to assess the overall programme knowledge and broader discussions with CottonConnect's local team.

Farmers are verified by onsite farm and demo plot visits, farmer interviews, FFB data cross-verification and documents maintained at the farmer group level. Verification of gins is carried out via onsite visit to the ginning units, interaction with the ginner and managers/supervisors for overall programme knowledge assessment, relevant documentation checks related to traceability and HSSE, general observations, and interaction with the workers.

FLOCERT shares the verified data as compliance status with remarks/observations against each criteria of the REEL Cotton CoC, a narrative summary of observations/critical findings and an overall score of the programme. Based on the report, a corrective action plan for any critical findings is created and implemented by the farm team and regularly monitored by the ME&L team.

This multi-level methodology ensures that the programme adheres to the sustainability criteria of the REEL Cotton CoC and that the impact data is third-party verified. The verification process is further explained in the [Monitoring and Evaluation Processes and Verification Mechanisms](#) document.

ISEAL Community Member

CottonConnect is an ISEAL Community Member. The REEL Cotton Programme was the primary system assessed during the application process and meets the necessary requirements. ISEAL supports ambitious sustainability systems and their partners to tackle the world's most pressing challenges. ISEAL Community membership is based on three parameters: organisation and system overview, transparency, and annual improvement plan. ISEAL Community Members are committed to improving their systems, building trust and demonstrating transparency. By becoming an ISEAL Community Member, CottonConnect

has joined a growing number of well-respected sustainability systems that are driving positive social and environmental change across multiple sectors. This includes:

- Exploring new ideas, networking, sharing experiences and collaborating to pioneer better sustainability solutions.
- Working for continuous improvement of the system and overview.
- Improving transparency in the system.
- Mandatory stakeholder engagement in the system improvement.