

# CLAIMS FRAMEWORK



U.S. COTTON  
TRUST PROTOCOL®

V2.0 / SEPTEMBER 2022

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# DEFINITIONS

**Aggregator:** Supply chain entities, typically cotton merchants, cooperatives or gins, that assist the U.S. Cotton Trust Protocol in the administration of the program, including the uploading of shipment data for the shipment of U.S. Cotton and/or Protocol Cotton shipments to Trust Protocol member yarn and textile mills in the Protocol Consumption Management Solution (PCMS).

**Allocated PCCU Volumes:** Defined as the volume of PCCU's allocated to a Brand-Retailer Member at the beginning of the Protocol Year by Protocol program managers. This allocation will be based upon the Brand-Retailer Member's proportional Consumption Forecasts.

**Article:** Defined as one specific unit of material tracked within the PCMS which can be a yarn article, a fabric article, or a garment article.

**Assigned Environmental Metrics:** Refers to the annual program environmental metrics for each of the key indicators, aggregated and verified for the total Protocol Cotton production and assigned to participating brands based upon their consumption of Protocol Consumption Units and associated volumes of Protocol-Eligible fiber tracked in the PCMS.

**Blockchain:** Digital 'distributed ledger' technology capable of storing information that is 'tamper-proof' and available for use by authorized users.

**Consumption Forecasts:** Defined as non-binding forecasted volumes of Total Cotton consumption from all sources as well as Protocol-Eligible fiber consumption for a given Protocol Year. Brand-Retailer Members will be required to submit their Consumption Forecasts by a pre-determined date for the upcoming Protocol Year (starting on August 1st) and the Allocated PCCU Volumes will be determined and communicated to the individual Brand-Retailer Members by no later than June 30th.

**Growers:** The terms farmer, grower or producer can be used interchangeably to be in line with language of the brand, preference or grammar.

**Environmental Data Aggregation:** Process of compiling and analyzing the sum of all participating Protocol Grower's environmental data and reporting it externally at a Trust Protocol program level.

**More sustainable:** a short way to describe the principle of year on year continuous improvement followed by the Trust Protocol and its participating growers. In relation to claims statements, the Trust Protocol allows the use of 'sustainable' and 'more sustainable' interchangeably in line with user preference.

**Protocol-Eligible fiber:** Cotton fiber of U.S. origin that has been tracked through the supply chain into a Brand-Retailer Member's finished products via the PCMS system. **Protocol-Eligible fiber can be either harvested by a qualified Protocol Grower, defined as Protocol Cotton, or by any U.S. Cotton farmer defined as U.S. Cotton under the Trust Protocol program – both must then be tracked via the PCMS.**

**Protocol Claims:** Refers to all marketing and/or communication content that is published externally or internally but which describes a Protocol Member's participation or activities related to their participation in the Protocol.

- All Protocol Claims are governed under the rules as established and communicated in the Trust Protocol Claims Framework and are subject to review and approval by the U.S. Cotton Trust Protocol program in all instances.

**Protocol Consumption Management Solution (PCMS):** Defined as the technology solutions that record and track the movement of Eligible U.S. Cotton fibers through Brand-Retailer Member supply chains into their finished products.

**Protocol Cotton fiber:** Defined as fiber grown and harvested on a qualified Protocol Grower's farm and recorded in the PCMS as Protocol Cotton.

**Protocol Consumption Unit:** (PCCU): Defined as the digital representation of each kg of Protocol Cotton, grown and harvested on qualified Protocol Grower's farm, to which a representative environmental metric value is assigned. Available by request to Brand-Retailer members in volumes equivalent to their consumption of U.S. Cotton and/or Protocol Cotton fiber in their finished products as recorded in the PCMS in any given Protocol Year.

**Protocol Bank:** Defined as the central repository for all minted PCCUs. The total volume of PCCUs in the Protocol Bank can never exceed the total volume of recorded Protocol Cotton fiber kilograms recorded in the PCMS.

**Protocol Year:** Defined as the operating fiscal year under which the Trust Protocol operates and running from August 1st in any calendar year to July 31st in the following calendar year.

**Protocol-Eligible Materials:** Defined as any material, including finished product (apparel or home textiles) or any intermediary products (yarns, greige fabrics and finished fabrics) that are recorded in the PCMS and have consumed U.S. Cotton and/or Protocol Cotton fiber. Protocol-eligible finished products are eligible for Brand-Retailer Members to initiate claims for PCCU's in an equivalent volume to the eligible fiber consumed to produce said finished products.

**Protocol-Eligible Products:** Defined as finished products that contain eligible cotton, which have been tracked within the PCMS as per program requirements. Each shipment of Protocol-Eligible Products received and captured within the PCMS will result in the Brand-Retailer Member executing a PCCU request for the cumulative volume of eligible cotton tracked in the PCMS as consumed in the production process, including waste factors for each conversion process within the production process, subject to approval by program managers.

**Representative group:** Refers to the 2015 grower data set used to create the baseline reference for Trust Protocol program environmental metrics. Refer to the Trust Protocol Annual Results Report for full detail.

**Regenerative practices:** Regenerative agriculture describes farming practices that can reverse climate change by rebuilding soil organic matter and restoring soil biodiversity – resulting in both carbon drawdown and improving the water cycle. Regenerative agriculture aims for net positives and calls for growers to be continually improving their practices and techniques. Practices such as conservation tillage, crop diversity and cover crops aid soil health and increase soil carbon levels.

**Traceability:** is the ability to trace the history, application or location of an entity by means of recorded identifications (ISO 9000-2005).

**Transparency:** relates directly to relevant information being made available to all elements of the value chain in a standardised way, which allows common understanding, accessibility, clarity and comparison. (EU Commission, 2017).

**U.S. Cotton:** Defined as any U.S. Cotton fiber that is recorded in the PCMS. Reference to U.S. cotton in this document is distinct from Protocol Cotton.



# 01: INTRO- DUCTION

## U. S. COTTON TRUST PROTOCOL – OVERVIEW

The U.S. Cotton Trust Protocol is a voluntary, farm level science-based sustainability program that is setting a new standard for delivering value to all stakeholders across the entire supply chain from farm to finished products. Combining verified cotton production data with blockchain enabled value chain transparency delivers the assurance brands and retailers need to evidence their responsible sourcing practices and demonstrate progress toward environmental targets.

The Trust Protocol is built on a foundation of robust data capture, aggregation and reporting that drives continuous improvement across six key sustainability metrics; GHG Emissions, Irrigated Water Use, Soil Conservation, Energy Use, Soil Carbon and Land Use Efficiency. The Trust Protocol integrates these sustainability metrics from Field to Market's Fieldprint® Platform, enabling enrolled growers to measure the environmental impacts of their operation and identify opportunities for continuous improvement, while empowering brands and retailers to report on aggregate sustainability data which is verified by Control Union Certification. To verify their production, participating U.S. cotton farmers (Trust Protocol Growers) are required to;

- a) complete a comprehensive self-assessment questionnaire that captures the practices they have adopted on their farms
- b) submit specific values after their harvest into the Field To Market™ Fieldprint Calculator and
- c) sign a Certificate of Commitment.

Each Protocol Grower receives a scorecard of their performance and a comparison to regional and national benchmarks, as well as a report that highlights the practices they could further adopt to improve their sustainability outcomes.

The Trust Protocol aggregates all verified Trust Protocol Grower data and reports annually against the same six environmental metrics, providing a detailed representation of the program's results. This data will also be available in various formats to Trust Protocol Members, depending on their membership type and consumption of Protocol Consumption Units.

Learn more about the Trust Protocol program [here](#).



**Scope of this document**

This document is designed to govern and provide guidance to all members of the Trust Protocol when communicating their commitment to the Trust Protocol mission and vision, their participation, and any results stemming from their involvement in the program.

This framework is designed to ensure that only verified, honest and credible Protocol Claims are made, protecting the reputations of all parties involved but also creating strong tools that will enable robust story-telling and communications around the Trust Protocol.

**This document allows for but is not limited to the following communication channels:**

**Stakeholder-facing:** Company website and sustainability/CSR pages, Investor and stakeholder communications, Internal employee communications and employee training, Intranet, Social media, Press opportunities, Speaking engagements, CSR Reports.

- **Target audiences:** Employees, Consumers, NGOs, Investors, Governmental Agencies, Board of Directors, Business partners and Suppliers

**Consumer-facing:** Ecommerce websites, in-store applications, on-product messaging. These types of channel communications are recognized for their importance in driving value for Brand-Retailer Members, but also will be governed by higher levels of criteria for eligibility as defined in this framework.

- **Target audiences:** Consumers



**How it works**

The Claims Framework starts with membership of the U.S. Cotton Trust Protocol. Trust Protocol Claims of some form are available to all members, with enhanced claims accessible to Brand-Retail members consuming Protocol Consumption Units.

Once enrolled and on-boarded into the Trust Protocol, Brand-Retail Members can access a wide variety of verified data related to environmental outcomes of the Trust Protocol program and enhanced supply chain transparency. With access to this data, Brand-Retailer members can more credibly and effectively communicate to their various stakeholders the environmental outcomes associated with their consumed Protocol Cotton, enhanced visibility into their supply chains, their commitment to sustainable practices and products, and their company’s alignment with the core principles of the Trust Protocol.



**Protocol Consumption Management Solution (PCMS)**

The Protocol Consumption Management Solution (PCMS) harnesses blockchain and other digital technologies to record and verify the movement of its cotton along the entire supply chain, validating for Brand-Retail Members their consumption of U.S. Cotton and Protocol Cotton across their entire supply chains and into their finished products. Using the PCMS, Brand-Retail Members can make claims based on data-backed, verified PCCUs linked to their consumption of eligible cotton.

Please note that the Trust Protocol does not link the source of any particular volume of U.S. Cotton or Protocol Cotton to a Trust Protocol participating farm. Members should not represent or otherwise imply that the physical cotton in a specific product has come from a specific Trust Protocol farm.

Read more about our how our consumption solution works [here](#).



# 02: HOW TO USE THIS DOCUMENT

A. PROTOCOL CLAIM CATEGORIES ARE SET OUT HERE:

**General statements**

Everyone can use, no membership requirement

**Supporting or participation claims**

All members can use

**Program-outcome claims**

Brand & Retail members consuming Protocol Fiber (PCCUs) can use

**Public-facing claims**

**Consumer-facing claims**

**Volume-related claims**

**On-product claims**



**General statements** are publicly available, and are intended to support all stakeholders in describing or making general reference to U.S. Cotton, and to add context to communications about the Trust Protocol program and practices. The Trust Protocol believes in continuous improvement across all U.S. cotton production and has therefore made some general statements about U.S. cotton. Use of these statements does not require Trust Protocol membership, however the Trust Protocol name, logo and all related intellectual property are protected under trademark laws.

**Participation claims** are specific to your category of membership and are intended to support members in communicating their support for, participation in, and commitment to, the Trust Protocol program.

**Program-outcome claims** are intended to be used to describe the overall program achievements and to reference progress of specific environmental indicators against environmental goals. Making a Program Outcome Claim associates a member's participation with program outcomes and can only be used by Brand-Retail Members actively consuming PCCUs. Ahead of making a Program Outcome Claim, members must have publicly communicated their participation.

**Public-facing claims** are claims that communicate program membership, participation and support of the Trust Protocol to a wider public audience that may include Employees, Consumers, NGOs, Investors, Governmental Agencies, Board of Directors, Business partners and Suppliers

**Consumer-facing claims** are claims intended to support customer (consumer) facing communication about the Trust Protocol and a member's participation in it through brand and retailer marketing and social media channels, and can only be used by Brand-Retail Members actively consuming Protocol Fiber and related PCCUs. Ahead of making a customer facing claim, members must have made public-facing claims communicating their membership and participation in the Trust Protocol.

**Volume-related claims** are claims that communicate a member's specific volume of consumed U.S. Cotton and/or Protocol Cotton fiber, or the number of PCCU's consumed in any given time period. These claims are available to Brand-Retail Members and are **subject to a review and approval by Protocol program managers**

**On-product claims** are claims attached physically, visually or by inference to an individual finished product and communicated via consumer-facing channels. On-Product Claims can fall within two (2) distinct categories:

- **On-Product Program Participation Claims:** defined as claims that communicate to consumers the Brand-Retailers' participation, support and commitment to the Trust Protocol program.
- **On-Product Content Claims:** defined as claims that look to communicate consumption of U.S. Cotton or Protocol Cotton fiber within specific products. In order to ensure the credibility and protect the reputations of both the Brand-Retailer Members and the Trust Protocol, these claims will be subject to more stringent prior approvals than all other claims.





## B. CLAIMS APPROVAL PROCESS

**Members are required to notify the Trust Protocol of their intention to make public claims, using the template form in appendix 2, by email to [Claims@trustuscotton.org](mailto:Claims@trustuscotton.org).**

**The request should detail:**

- The nature of the claim, working within the guidance of this framework
- When it will be used
- Where it will be used – marketing or communication setting, intended audience, geographical reach, connection to any communications campaign
- Any requested variation to the framework guidance if applicable, and associated need/rationale

**The Trust Protocol secretariat will endeavour to respond to claims approval requests within 5 working days and reserves the right to:**

- Reject claims that do not align to the guidance and program principles
- Make spot checks to ensure claims are executed as planned
- Withdraw approval of claims at any time, in order to protect program and organizational reputation.

Approved claims will receive a reference number which should be quoted by the applicant as detailed in section C, customer claims.

## C. LEGAL REQUIREMENTS AND DUE DILIGENCE

As a condition of membership and use of the Protocol's PCMS, Members must follow all applicable laws, including but not necessarily limited to any representations and claims they make concerning their membership and their use of U.S. Cotton and or Protocol Cotton fiber. The Trust Protocol does not provide legal advice or counsel to Members concerning their compliance with applicable law in the jurisdictions in which they operate, and nothing in this Claims

Framework is intended to serve as nor should be relied up on as providing legal advice or guidance. Members must apply their own due diligence in ensuring that any Claims they make comply with all applicable laws in their particular markets and in the context in which they want to use them, and remain so following language translation.

**Please note the Trust Protocol does not link the source of any particular volume of U.S. Cotton or Protocol Cotton to a Trust Protocol participating farm. Members should not represent or otherwise imply that the physical cotton in a product has come from a specific Trust Protocol farm.**

Members making claims are responsible for verifying that such claims satisfy all applicable laws, including the marketing and labeling laws of the country(ies) in which the relevant products will be available for use or sale.

Example of relevant guidance includes (but are not limited to):

### **International:**

**[ISO 14020, ISO 14021, ISO 14024, ISO 14025](#)**

### **U.S.:**

**[Federal Trade Commission's, 16CFR Part 260, "Guides for the Use of Environmental Marketing Claims \(Green Guides\)", 2012](#)**

**[Federal Trade Commission, 16CFR Part 255, "Guides Concerning the Use of Endorsements and Testimonials n Advertising," 2020](#)**

**[US Textile Fiber Products Identification Act](#)**

### **EU:**

**[Guidance on the application of the Unfair Commercial Practices Directive \(environmental claims\), 2017](#)**

**[Regulation 1007/2011 on Textile names and related marking of the fibre composition of textile goods](#)**

**[Initiative on substantiating green claims](#)**

### **UK:**

**[Green Claims Code, 2021](#)**

**[The Textile Products \(Labelling and Fibre Composition\) Regulations 2012](#)**

**Use of our program data**

Brand-Retailer Members must adhere to program requirements as relates to any use of program data. At no time shall a Brand-Retailer Member misrepresent overall program data as being representative of their specific actions, consumptions or membership in the Trust Protocol.

**Avoiding misleading claims**

By adhering to the approval process, Members are better equipped to make sound Claims about the Trust Protocol program and any associated environmental or other outcomes. Claims should not be disproportionate to Member use of U.S. cotton, Protocol Cotton, or participation in the program.

**Right to withdraw**

The U.S. Cotton Trust Protocol reserves the right to refuse approval, or to withdraw approval that has already been given, for any Claim relating to the program, at any time, in order to protect the program from misrepresentation, misleading or inaccurate claims.

**Monitoring**

The Trust Protocol Program will monitor the use of member claims in the public domain. False or misleading claims that violate the Protocol’s Code of Conduct and, depending on the circumstances of the violation, could warrant termination of membership. A violation of any applicable laws may also warrant termination of membership.

Any member observing an inappropriate representation of the Trust Protocol in the public domain is encouraged to report it to the Protocol program managers.

**D. BRANDING AND LOGO**

The Trust Protocol has created a public facing identity for use by its members. It enables program-level visual identification and product specific claims.

Public facing identity for members



Allows for instant recall and application across digital and physical spaces.

Leaves of the cotton boll now also resemble a check mark! This new leaf shape stamps our cotton boll with a symbol of verification.

As well as in the neon green and blue, members can also use their own colors.

Examples



For those consuming only U.S. Cotton, the COTTON USA logo is also permitted to be used if preferred.

The current B2B logo will predominantly be used the Trust Protocol program only.

A summary is included here, please refer to the [Trust Protocol Member Toolkit](#) provided to all members for full detail.

# 03: COMMUNI- CATING

ABOUT **U.S. COTTON** AND  
THE **U.S. COTTON**  
**TRUST PROTOCOL**



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This section sets out corporate statements, which are not intended for use in customer facing communications.

## A. GENERAL STATEMENTS ABOUT U.S. COTTON

These statements are intended to support members and stakeholders in describing or making reference to U.S. Cotton as tracked within the PCMS, to add context to communications about the Trust Protocol program when making corporate statements.

### Example statements

- Cotton grown in the U.S. uses innovative seed varieties scientifically developed for increased efficiency, amongst other aspects that contribute to sustainable agriculture and climate resilience.
- U.S. cotton has a 35-year history of reducing environmental impacts. Reductions in impacts in the U.S. are driven by adoption of precision agriculture technology and advanced analytics that improve yield and fiber quality. Further adoption of technology and best practices will continue to improve cotton production and help meet the 10-year sustainability goals.
- U.S. cotton production is governed by a strict national regulatory system. Environmental and workplace regulations are enforced by federal and state agencies, and the penalties for non-compliance are both civil and criminal.
- Every bale of U.S. Cotton has its own Permanent Bale Identification (PBI) tag. As each bale goes through the ginning and classing process, this tag goes along with it, enabling the tracking of where, when and how it was harvested, ginned and classed. The latest computer classing technology is used to make sure every bale of U.S. Cotton is fairly and correctly classed, ensuring uniformity and consistency within classes.

Refer to further public sources of information on U.S. cotton and on [worker well-being](#).

Refer to further public sources of information on U.S. Cotton production in the Field to Market: Alliance for Sustainable Agriculture [National Indicators Report](#).

## B. STATEMENTS ABOUT THE TRUST PROTOCOL PROGRAM

### I. Describing the program

These statements are intended to support members and stakeholders in describing or making reference to the U.S. Cotton Trust Protocol program.

### Example statements

- The U.S. Cotton Trust Protocol sets a new standard in more sustainably grown cotton bringing quantifiable and verifiable goals and measurement to U.S. cotton production and driving continuous improvement in key sustainability metrics.
- Trust Protocol farmers are committed to continuously improving their environmental footprint, including water usage, soil diversity and greenhouse gas emissions.
- The Trust Protocol promotes that growers adopt a range of practices that support regenerative principles, including conservation tillage, application of cover crops, and crop rotation. Together, these practices improve soil health, reduce soil loss, and increase biodiversity.
- Launched in 2020, the U.S. Cotton Trust Protocol is a farm level, science-based program recognized by Textile Exchange as a source of preferred fiber that supports the Cotton 2025 Sustainable Cotton Challenge. The program has also been recognized and published in the [ITC Standards Map](#), accepted as an ISEAL Community Member, and approved as a standard for sustainable cotton by Siegelklarheit, an initiative of the German Federal Government.
- The U.S. Cotton Trust Protocol integrates the sustainability metrics of Field to Market's Fieldprint® Platform, enabling enrolled producers to measure the environmental impacts of their operation and identify opportunities for continuous improvement,

while empowering brands and retailers to report on verified sustainability data.

- The U.S. Cotton Trust Protocol, through its PCMS solution, tracks the consumption of U.S. Cotton fiber and Protocol Cotton fiber throughout the supply chain for member brands, from yarn spinning to finished goods. Starting with the authentication of the origin of the cotton fiber, supply chain transactions are assured through a robust double verification process.
- The U.S. Cotton Trust Protocol delivers full supply-chain transparency – from origin-authenticated U.S. cotton bales to finished products – by recording article-level transaction and production data directly from each organization involved in the complete production process.

## ii. Describing the Trust Protocol farming practices

These statements describe the farming practices that support positive environmental outcomes in line with the Trust Protocol environmental indicators.

### Example statements

- Trust Protocol farmers deploy a range of farm management practices shown to reduce **greenhouse gas emissions** including reduced tillage, reduced use of plant nutrients, energy efficient harvesting and drying, and conservation agriculture.
- Trust Protocol farmers deploy a range of farm management practices shown to improve **energy efficiency** across a range of activities including crop applications, irrigation, drying and transportation.
- The Trust Protocol helps farmers to increase water-use efficiency by providing evidence-based analysis on how their local conditions and farm management practices are affecting water use. By promoting **water-use efficiency** opportunities relevant to the specific seed type, climate conditions, economic conditions, and regional water management rules enables growers to prioritise the practices that will have the greatest impact on increasing their water use efficiency.
- The Trust Protocol supports farmers to enhance **soil conservation** by providing evidence-based analysis on soil health opportunities relevant to the specific crop type, soil type, crop applications, irrigation system and local climate conditions. Farmers are able to prioritize the practices that will have the greatest impact on reducing soil loss and preserving soil biodiversity.
- The Trust Protocol supports farmers to increase **soil carbon**, an important indicator linked to water filtration, water and nutrient holding, crop productivity and carbon storage. Providing evidence-based analysis on the grower's adoption of conservation practices, use of cover crops, tillage and crop rotation, and the resulting impact on soil carbon, all contribute to the farmer's ability to improve soil carbon year on year.
- The Trust Protocol supports farmers to maximize **land use efficiency**, ensuring the greatest production output (or yield) on the minimum area of land. Providing evidence-based analysis on the factors contributing to yield, including plant genetics, crop management practices and environmental factors like temperature, radiation, humidity, water availability all support the grower in making decisions that enhance their land use efficiency.
- Trust Protocol growers adopt a range of practices that support **regenerative principles**, including conservation tillage, application of cover crops, and crop rotation. Together, these practices improve soil health, reduce soil loss and increase biodiversity.
- Worker health and safety are priorities for the U.S. cotton industry and the Trust Protocol contains robust criteria for **labor practices** supported by a grower questionnaire on worker rights and well-being. Areas of focus include fair labor and child labor as well as safety and hygiene.

### Further resources

Visit [our website](#) for further resources on the program detail, including principles & criteria for farmers.

# 04: TRUST PROTOCOL CLAIMS

## A. MEMBER PARTICIPATION CLAIMS

These claims are specific to your category of membership, and are intended to support members in communicating their participation in, and commitment to, the program.

### i. Brands and retailers

- At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program designed to set a new standard in more sustainably grown cotton from farms to fiber.
- At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol as part of our commitment to sustainability.

Optional supporting statements available in section 3.b.

### ii. Brands and Retailers consuming PCCUs

- As a member of the U.S. Cotton Trust Protocol [Name] is committed to helping set a new standard in more sustainable cotton production by building full transparency of our cotton supply chain and supporting best practice in cotton production.

- At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program designed to set a new standard in more sustainably grown cotton from farms to fiber
- Launched in 2020, the U.S. Cotton Trust Protocol is designed to set a new standard in more sustainably grown cotton, ensuring it contributes to the protection and preservation of the planet, by promoting farmers' use of environmentally and socially responsible practices.
- At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, the only program to provide field-level environmental data as well as traceability and transparency in the supply chain.
- [Name] is committed to tracking [X] % (or Y tons) of our cotton through the U.S. Cotton Trust Protocol by [date] as part of our commitment to sustainability and the transparency of our supply chain.
- [Name] is committed to tracking [X] % (or Y tons) of our cotton through the U.S. Cotton Trust Protocol, a program that enables us to source more sustainably grown cotton and provides data on environmental metrics of U.S. cotton production.

- [Name] has achieved article-level transparency across the supply chain for U.S. Cotton through the use of the U.S. Cotton Trust Protocol's blockchain-enabled Protocol Consumption Management Solution (PCMS).
- By consuming U.S. Cotton, as tracked through the U.S. Cotton Trust Protocol program [Name] is building transparency of our value chain from fiber source to finished products, ensuring visibility of all suppliers participating in the complete production process of our products.
- By consuming Protocol Cotton\*, as tracked through the U.S. Cotton Trust Protocol program [Name] is building transparency of our value chain from fiber produced by Trust Protocol farms to finished products, ensuring visibility of all suppliers participating in the complete production process of our products.

*\*Protocol Cotton may only be used when describing cotton fiber physically originating from Protocol Farms*

### iii. Mills and manufacturers

- As a member of the U.S. Cotton Trust Protocol [Name] is committed to helping set a new standard in more sustainable cotton production by building full transparency of our cotton supply chain and supporting best practice in U.S. cotton production.
- [Name] participates in the U.S. Cotton Trust Protocol in order to support Brand and Retailers' goals for more sustainable materials and more transparent supply chains.
- [Name] partners with our suppliers to source cotton through the U.S. Cotton Trust Protocol, positioning our company as valued part of a more sustainable and transparent supply chain for our Brand-Retailer partners.

### iv. Aggregators

- Through the U.S. Cotton Trust Protocol, [NAME] can secure a stable supply of responsibly grown cotton to support the fashion and textile industries in meeting their corporate environmental and social responsibility goals.

- As Aggregators, [NAME] encourages our growers to partner with us in the U.S. Cotton Trust Protocol and the journey to continuous improvement. By adopting the U.S. Cotton Trust Protocol principles, growers are committing to using environmentally and socially responsible practices.

### v. Farmers

- As farmers we know how important sustainability is in cotton production, and the U.S. Cotton Trust Protocol is providing growers like me the opportunity to share with consumers, brands and retailers how we grow cotton using environmentally and socially responsible practices.
- I am proud to be among the first growers to commit to the U.S. Cotton Trust Protocol, which sets a standard for responsibly grown cotton. I am using the tools and insights provided by the Trust Protocol to ensure our farm is supporting the national goals and science-based targets.
- With the U.S. Cotton Trust Protocol I can record, track and verify our farming system is continuously improving while seeking progressive approaches to improve on our efforts in environmentally and socially responsible practices.
- Like other U.S. Cotton Trust Protocol farmers, I am applying a range of practices across my farm to ensure my crop is grown responsibly, for instance rotating cotton with other crops, in order to improve my environmental footprint.

### vi. Supporters

Any members not participating in the Trust Protocol value chain, including donors, foundations, investors, non-consuming brands)

- [Name], is a proud supporter of the U.S. Cotton Trust Protocol, a program designed to set a new standard in more sustainably grown cotton from farms to fiber.

- [Name], as a supporter of the U.S. Cotton Trust Protocol, is committed to a program that is helping farmers adopt the principles and continuous improvement practices of the Trust Protocol to increase soil health and carbon storage, increase biodiversity, and reduce greenhouse gas emissions.

## B. PROGRAM OUTCOME PROTOCOL CLAIMS

Program outcome Protocol Claims are intended to be used to describe the overall program achievements and to reference progress of specific environmental metrics and improvements towards environmental goals.

Making a program outcome claim associates a member's participation with program outcomes, either in aggregate or in volume related form, and can only be used by Brand-Retail members actively consuming eligible fiber (PCCUs).

Ahead of making a program outcome claim, members must have publicly communicated their participation. See '[participation claims](#)' in this document.

**These claims are available to Brand & Retailer members claiming PCCUs.**

### Where to obtain the latest program results

The Trust Protocol Annual Report is published to Trust Protocol Members, with aggregated program results available to all members and additional impact insights provided to Brand-Retailer members consuming eligible fiber (PCCUs). The report details data collection and analysis, the baseline or reference point for comparison, and detailed explanation of the results. The public report can be found at [here](#).

**Brand-Retailer Members must adhere to program requirements as relates to any use of data. At no time shall a Brand-Retailer Member misrepresent overall program data as being representative of their specific actions, consumptions or membership in the Trust Protocol.**

Member specific volumes of assigned environmental metrics are available through the PCMS brand dashboard, updated when the available PCCUs are drawn down from the Protocol Bank to be used by the consuming brand to build a claim in accordance with this guidance. Please refer to the guidance in this section on using environmental metric data.

### i. Example aggregate program claims

- In [year] a total of [number] farmers participated in the U.S. Cotton Trust Protocol, delivering [X tons or Ym bales] of Protocol Cotton fiber to market, which is [Z%] of total U.S. cotton production.
- In [year] Trust cotton production of [number] acres representing [number]% of the crop used conservation tillage practices, directly improving soil health by reducing net soil loss and increasing soil organic matter.
- In [year] Trust Protocol cotton production of [number] acres representing [number]% of the crop planted cover crops, maintaining living roots in the ground and protecting the soil.
- In [year] Trust Protocol cotton production of [number] acres representing [number]% of the crop implemented crop rotation, helping to improve soil biodiversity with an increase in soil carbon storage because of the presence of diverse soil microbial groups.

<sup>1</sup> Refer to most recent Impact Report for full detail on the baseline





- As a member of the U.S. Cotton Trust Protocol, which aims to set a new standard in more sustainable cotton production, we are proud that farmers in the [year] program achieved an aggregate;
  - A % water efficiency improvement
  - B % GHG emissions reduction
  - C % energy use reduction
  - D % soil conservation improvement
  - E % land use efficiency improvement

Compared to a 2015 representative group<sup>1</sup>

### ii. Example volume specific outcome claims

- [NAME] consumed [data point] tons of U.S. Cotton in [year], tracked through our supply chain by the U.S. Cotton Trust Protocol.
- [NAME] consumed [data point] tons of Protocol Cotton\* in [year], tracked through our supply chain by the U.S. Cotton Trust Protocol.
- [NAME] consumed [data point] Protocol Consumption Units with respect to the U.S. Cotton fiber we sourced and tracked through our supply chain in [year].

*\*Protocol Cotton may only be used when describing cotton fiber physically originating from Protocol Farms.*

### iii. Supporting statements

- With the U.S. Cotton Trust Protocol, which integrates sustainability metrics from Field to Market's Fieldprint® Platform, we are now able to monitor and track sustainability improvements and inform our understanding of a range of cotton production metrics, including **greenhouse gas emissions**. The U.S. cotton industry aims to reduce greenhouse gases for each kilogram of cotton by 39% by 2025, versus a 2015 representative group, which is aligned with [NAME's] (goals/targets/SBTs) to reduce emissions by [X% by 20XX].
- With the U.S. Cotton Trust Protocol, and sustainability metrics from Field to Market's Fieldprint® Platform, we now have year-on-year data to show progress across several cotton production metrics, including **energy use**. The Trust Protocol measures the U.S. cotton industry's efforts to reduce the energy used to produce each kilogram of U.S. cotton by 15% by 2025, which supports [NAME]'s target to reduce energy usage by [insert goal].
- Continuous improvement of our **water** footprint is important to [NAME], which is why we have decided to source more sustainable fiber through the U.S. Cotton Trust Protocol. Water is a precious resource and Trust Protocol farmers use precision irrigation techniques to minimize the amount of water used. The Trust Protocol supports efforts to reduce the water used to grow each bale of U.S. cotton by 18% by 2025 versus a 2015 representative group and verifies U.S. cotton's sustainability progress through yearly data tracking.



- Protecting the **soil** for future generations is important to [NAME]. Conserving soil is a critical element of sustainable agriculture, helping to improve water ecosystems and biodiversity. On a yearly basis, Protocol growers document and monitor their growing practices through integration of sustainability metrics from Field to Market's Fieldprint® Platform. [NAME] is proud to support U.S. Cotton Trust Protocol farmers in their efforts to improve soil health and their ambitious goal of 50% reduction in soil erosion – meaning no net soil loss by 2025.
- Cotton is a key raw material for [NAME] which is why we have decided to source more sustainable fiber through the U.S. Cotton Trust Protocol. The Trust Protocol tracks the practices that U.S. cotton growers use to increase the amount of carbon stored in the soil. Increased **soil carbon** leads to healthier soil and less carbon dioxide in the atmosphere, and can help to reduce global climate change. The Trust Protocol program integrates sustainability metrics from Field to Market's Fieldprint® Platform to provide us with important annualized data on soil carbon and other metrics that align with our commitments towards continuous climate impact improvements.
- Efficient **land use** is a priority for [NAME], which is why we are sourcing cotton through the U.S. Cotton Trust Protocol. As part of our more sustainable fiber sourcing strategy we are supporting U.S. cotton farmers in their work to reduce the land needed to produce a bale of cotton by 13% by 2025.
- Regenerative practices in agriculture are an important aspect of [NAME]'s approach to sustainable sourcing. By participating in the Trust Protocol, we are learning from U.S. cotton farmers and their work to adopt a range of practices that support **regenerative principles**.

#### iv. Guidance on using and comparing environmental outcome data:

##### Absolute values

Brand-Retail Members consuming eligible fiber (PCCUs) may use the absolute values of their verified consumption and proportionately assigned environmental metrics each year to support or contribute to relevant aggregate environmental footprint calculation, for example scope 3 carbon emissions tracking. Any direct application of Trust Protocol environmental metrics into a brand-retail member's raw material footprint calculation is carried out under the member's own responsibility. **These numbers are intended to provide business relevant insight and may not be reported outwardly in the form of a claim statement specific to cotton consumed through the program. This does not preclude members from including the data within a combined calculation for external reporting, for example 'all raw materials' or 'scope 3 total.'**

##### International alignment

Whilst comparing cotton impact data from different sources and production systems is complex, the Trust Protocol is committed to collaborating with expert groups to align on environmental indicators, reference data and modelling for cotton – one such priority for alignment is the EU Product Environmental Footprint rules. The Trust Protocol collaborates on this work through active participation in the Sustainable Apparel Coalition, the Textile Exchange, Cotton 2040 initiative, and others – sharing data and expertise from U.S. cotton production to support better understanding of cotton production globally. The program has also been recognized and published in the **ITC Standards Map**, accepted as an ISEAL Community Member, and approved as a standard for sustainable cotton by Siegelklarheit, an initiative of the German Federal Government.

##### Global goals

The U.S. Cotton Trust Protocol program supports the UN Sustainable Development Goals, read more about our contribution to the SDGs [here](#).

**The Trust Protocol does not allow its environmental metric results to be used in**

## DATA IN CONTEXT

A growing number of apparel and footwear companies are setting or committing to set science-based climate change targets. To do this, companies must measure greenhouse gas emissions across their own operations and value chain (scopes 1, 2 and 3). For brands and retailers, scope 3 emissions - in particular purchased goods and services (PG&S) emissions - make up the vast majority of total emissions.

Ideally, companies would have access to primary data for measuring PG&S emissions, for example, for a cut and sew facility, calculations would include activity data and emissions factors specific to the electricity and fuel used by the facility. For a cotton farm, calculations would draw from activity data and emissions factors from the energy source used for equipment and inputs such as fertilizer. However, gathering such primary data across a complex supply chain with a multitude of entities is not feasible for most companies.

In the absence of primary data, companies generally use secondary data from life cycle assessment databases such as the Higg Materials Sustainability Index (MSI) or Quantis World Apparel Life Cycle Database (WALDB) to estimate PG&S emissions. While these data sources can provide reasonable estimates of emissions for various materials and processes, they are not the exact figures for the company's activities. We raise this as the emissions factor for U.S. Cotton Trust Protocol cotton will be an average of the various farms that participate in the program, and so brand buyers of the cotton will be able to use the average emissions factor - but not factors from individual farms. The latter would be unnecessarily laborious and could potentially raise competitive issues.

**comparative statements to past consumptions and associated environmental metric data from other sources/programs.**

**The Trust Protocol does not support comparative impact claims that do not follow the best available science and [ISO LCA](#) standards, to avoid inappropriate use of data or misleading sustainability statements.**

**Public communication referencing a comparison of Trust Protocol data to data from any other source, or asserting a comparative 'improvement' Claim is not permitted.**

The Trust Protocol endeavours to maintain alignment with emerging and changing regulatory guidance surrounding sustainability communications and 'green claims', and commits to working closely with members to adapt as necessary.

## C. CUSTOMER FACING PROTOCOL CLAIMS

Customer facing Protocol claims are those intended to support customer (consumer) facing communication about the Trust Protocol and a member's participation in it through brand and retailer marketing and social media channels, and can only be used by Brand-Retail members actively consuming eligible fiber (PCCUs).

Ahead of making a customer facing claim, members must have publicly communicated their participation.

### i. General marketing claims

These claims are intended to support consumer facing communication through brand and retailer marketing, e-commerce (banner ads) and social media channels.

A full toolkit of promotional materials is included as part of the Brand Guidelines provided to all members and by using the U.S. Cotton Trust Protocol QR code, customers will be able to see up to date consumer facing information about the Trust Protocol.

**Please note that the Trust Protocol does not link the source of any particular volume of U.S.**



Cotton or Protocol Cotton to a Trust Protocol participating farm. Members should not represent or otherwise imply that the physical cotton in a specific product has come from a specific Trust Protocol farm.

**Example claims available to all Brand & Retailer members**

**Program Level Membership Claims**

- At <brand>, we’re proud to be a member of the U.S. Cotton Trust Protocol, a program designed to set a new standard in more sustainably grown cotton from farms to fiber.
- At <brand>, we’re proud to be a member of the U.S. Cotton Trust Protocol as part of our commitment to sustainability.
- Launched in 2020, the U.S. Cotton Trust Protocol is designed to set a new standard in more sustainably grown cotton, ensuring it contributes to the protection and preservation of the planet, by using environmentally and socially responsible practices.

**Example claims available to all Brand & Retailer members consuming PCCUs**

- At <brand>, we’re proud to be a member of the U.S. Cotton Trust Protocol, a program designed to set a new standard in more sustainably grown cotton from farms to fiber.

- Launched in 2020, the U.S. Cotton Trust Protocol is designed to set a new standard in more sustainably grown cotton, ensuring it contributes to the protection and preservation of the planet, by using sustainable and responsible practices.
- The U.S. Cotton Trust Protocol is committed to providing natural cotton fiber that is grown sustainably and is traceable and transparent.
- At <brand>, we’re proud to be a member of the U.S. Cotton Trust Protocol as part of our commitment to sustainability, traceability and transparency in our supply chain.
- At <brand>, we’re proud to be a member of the U.S. Cotton Trust Protocol, the only program to provide verified field-level environmental data as well as traceability and transparency in the supply chain.

To support customers in understanding the Trust Protocol, it is good practice to include the available QR code, a link or URL for them to follow for further information:

[consumer.trustuscotton.org](https://consumer.trustuscotton.org)

Refer to [section 2-D](#) of this document for Trust Protocol logo use and brand guidelines.

**ii. On-product claims for U.S. Cotton**

These claims are intended to support consumer facing communication within a product description on an e-commerce site, POS in physical retail locations (stores), hang tags or physical labels applied to product.

**These claims are available to Brand & Retailer members consuming Protocol Fiber (PCCUs)**

**Product must adhere to the following criteria:**

- Product contains a minimum of 50% cotton
- 100% of the cotton content in the product is of U.S. origin, tracked through the PCMS system

**Permitted U.S. Cotton claims:**

- ✓ [NAME], proud member of the U.S. Cotton

Trust Protocol\*

- ✓ This product contains [optional data point %] U.S. Cotton as verified by the Trust Protocol
- ✓ All of the cotton for these <ITEM/ COLLECTION> is verified by the U.S. Cotton Trust Protocol, a program which is committed to high environmental and social standards.
- ✓ All of the cotton for these <ITEM/ COLLECTION> is verified by the U.S. Cotton Trust Protocol, a program which aims to set a new standard in more sustainably grown cotton

*\*Other program membership statements set out above may also be used on product*

*Note: Please submit any new designs via email (TrustProtocolComms@hkstrategies.com) to the Trust Protocol for approval.*

**The Protocol claim approval reference number must be applied alongside the above.**

**The program-level verification stamp can be applied alongside the above.**

Product content claims can be supported by general marketing and participation claims set out in this document as well as representative farmer stories by request.

**Not permitted:**

- ✗ Umbrella messaging to suggest that the product is sustainable or has been sustainably produced, unless otherwise evidenced
- ✗ Generic terms such as ‘sustainable cotton’
- ✗ Inference that the cotton can be traced to a specific farm
- ✗ Reference to specific environmental metrics

**iii. On-product claims for Protocol Cotton**

These claims are available to Brand-Retailer

members **consuming Protocol Cotton, tracked through the PCMS system as physically originating from Trust Protocol Farms.**

**Product must adhere to the following criteria:**

- Product contains a minimum of 50% cotton
- 100% of the cotton content in the product is U.S. Cotton, of which;
- A minimum of 50% of the cotton content in the product is Protocol Cotton, tracked through the PCMS system

**Permitted Protocol Cotton claims:**

- ✓ [NAME], proud member of the U.S. Cotton Trust Protocol\*
- ✓ This product contains [optional data point %] Protocol Cotton, grown on Trust Protocol farms where farmers are committed to improving their environmental footprint, including water usage, soil diversity and greenhouse gas emissions.
- ✓ [NAME] uses more sustainably grown cotton verified by the U.S. Cotton Trust Protocol.
- ✓ All of the cotton for these <ITEM/ COLLECTION> is verified by the U.S.





Cotton Trust Protocol, a program which aims to set a new standard in more sustainably grown cotton.

- ✓ All of the cotton for these <ITEM/ COLLECTION> is verified by the U.S. Cotton Trust Protocol, a program which is committed to high environmental and social standards.
- ✓ All of the cotton for these [ITEM/ COLLECTION] is verified by the U.S. Cotton Trust Protocol, a program which works with family farms committed to improving their environmental footprint by minimizing water usage, improving soil diversity and reducing greenhouse-gas emissions.
- ✓ At [NAME], we're proud to be among the first brands to offer products using Protocol Cotton as part of our commitment to transparency and sustainability in our cotton supply chain from farms to fiber.
- ✓ Protocol Cotton: sustainably grown, data-powered
- ✓ Protocol Cotton: sustainably grown, data-powered, traceable
- ✓ Sustainably grown cotton: Natural, traceable and transparent, for you and for the planet

- ✓ Sustainably grown cotton: Natural, traceable and transparent from farms to fiber

*\*Other program membership statements set out above may also be used on product*

**The Protocol claim approval reference number must be applied alongside the above claims.**

**The product-level verification stamp can also be applied alongside the above claims.**

Product content claims can be supported by general marketing and participation claims set out in this document as well as representative farmer stories by request.

**Not permitted**

- ✗ Umbrella messaging to suggest that the product is sustainable or has been sustainably produced, unless otherwise evidenced
- ✗ Generic terms such as 'eco cotton'
- ✗ Inference that the cotton can be traced to a specific farm
- ✗ Reference to specific environmental metrics

*Note: Please submit any new designs via email (TrustProtocolComms@hkstrategies.com) to the Trust Protocol for approval.*



# 05: APPENDIX

## QUICK REFERENCE GUIDE TO MARKETING CLAIMS

— — —  
Please refer to the detail in this document for full guidance on creating an approved claim.

TYPE OF CLAIM:	WHERE THE CLAIM CAN BE MADE:		
	Stakeholder facing communication	Consumer facing communication	On product*
Participation	✓ Permitted	✓ Permitted	✓ Permitted
Program outcomes	✓ Permitted	✓ Permitted	✗ Not permitted
Volume consumption of eligible fiber	✓ Permitted	✓ Permitted	✗ Not permitted
Product content claim	✓ Permitted	✓ Permitted	✓ Permitted
Volume of PCCUs claimed	✓ Permitted	✓ Permitted	✗ Not permitted
Volume related environmental metrics	✗ Not permitted	✗ Not permitted	✗ Not permitted

*\*only where the product contains eligible fiber, meeting the criteria defined in the 'on product claims' rules.*

# CLAIM APPROVAL TEMPLATE

Please refer to the detail in this document for full guidance on creating an approved claim.

WHAT TYPE OF CLAIM WOULD YOU LIKE TO MAKE?	WHERE WILL YOUR CLAIM BE USED? Mark all that apply		
	Stakeholder facing communication	Consumer facing communication	On product
Participation			
Program outcomes			✗ Not permitted
Volume consumption of eligible fiber			✗ Not permitted
Product content claim			
Volume of PCCUs claimed			✗ Not permitted
Volume related environmental metrics			✗ Not permitted
For each of the claim types selected above, please indicate:			
When will the claim be used? Define the period of time in which the claim will be visible.			
Who is the intended audience?			
What is the anticipated geographical reach of the communication?			
The context of the communication, for example a consumer campaign or corporate report			
Describe where the claim will appear, for example in an e-commerce banner or in store signage			



<b>Describe any requested variation in language or format to that provided in the Trust Protocol claims guide</b>
<b>In the case of claim categories 3,4,5,6 confirm that you have drawn down a sufficient number of Protocol Claim Units (PCCUs) from the PCMS system to support your intended marketing claim.</b>
<b>Specific to on-product claims, please indicate:</b>
<b>The Brand name</b>
<b>This claim will appear (tick all that apply)</b>
<input type="checkbox"/> on physical product labels / hang tags <input type="checkbox"/> other (describe) <input type="checkbox"/> in e-commerce product copy <input type="checkbox"/> in printed product catalogs
<b>Selling period</b>
<b>Shipment start date:</b>
<b>Shipment end date:</b>
<b>Anticipated start date:</b>
<b>Anticipated end date:</b>
<b>Number of products (unique styles)</b>
<b>Number of product units</b>

**Any other information relevant to your claim request**

[Empty text area for providing additional information relevant to the claim request.]

Submit the claim form along with any associated artwork to: [Claims@trustuscotton.org](mailto:Claims@trustuscotton.org)

**For Trust Protocol Office use:**

Notes relating to approval

Claims license number if applicable

Approving manager name & date