THE U.S. COTTON TRUST PROTOCOL'S VERIFICATION PROCESS

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Launched in 2020, the U.S. Cotton Trust Protocol was designed to set a new standard in sustainably grown cotton, ensuring the program contributes to the continuous improvement on best management practices by using environmentally and socially responsible principles. While participation by U.S. cotton growers is voluntary, there are requirements to become a member. These include:

- Completing a **farm-level self-assessment questionnaire**
- Inputting **field-level data** into the **Fieldprint Calculator**, and
- Signing the **Farmer Commitment Statement** for continuous environmental – as well as health and safety– improvement.

The U.S. cotton growing region is broadly classified into four regions — **Southeast**, **Midsouth**, **Southwest**, and **West** as there are wide variations in the Cotton Belt such as soil type, moisture, and topography. **When a grower enrolls, a regional group is identified based on their farming location.** These groups will be the basis for second-party verification which utilizes the square root model in addition to a risk profile percentage from the previous year's third-party audit to determine the needed number of growers.

Incorporating the square root model allows for proportional sampling to better represent the groups and is standard in most verifications from the World Health Organization to the Food & Drug Administration, as well as Fortune 500 company Unilever. Additionally, as the number of grower participation increases, this methodology remains valid and statistically significant. Growers should not be selected from one year to the next (for up to three years), ensuring that each year brings a new set of growers to the second party audit process.
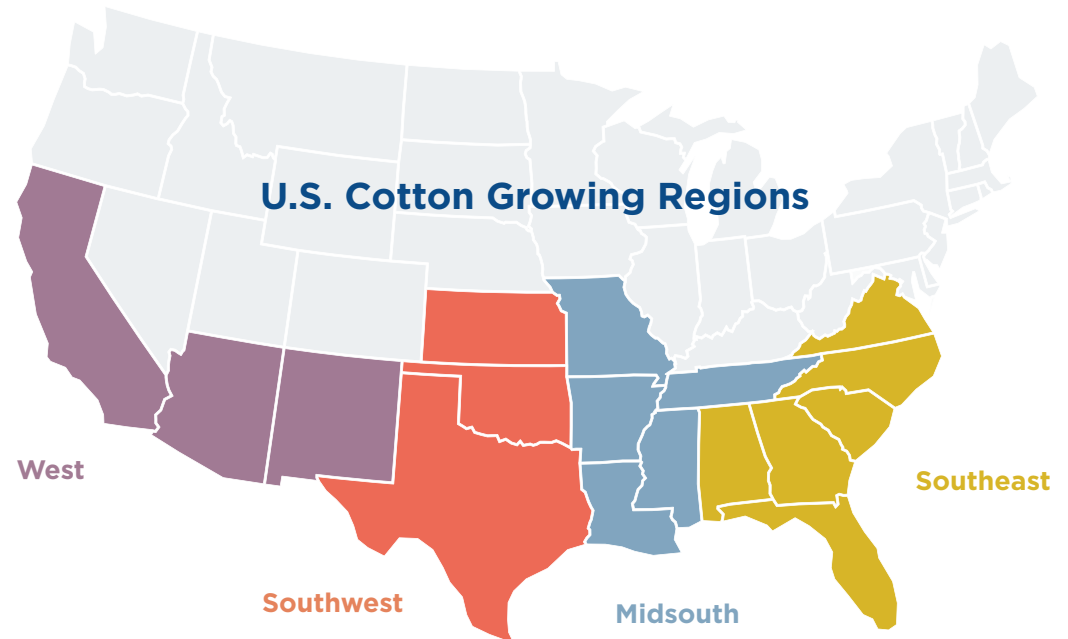
Third-party verification participation is also based on the square root of the grower's group and proportionate to those in each region. For example, if the group contains 50% of growers in Texas and 50% in Oklahoma, the verification sampling should mirror these statistics. Third-party verification is conducted during a half-day onsite visit walking through the farm, interviewing workers, and reviewing additional paperwork to ensure data is correct. If selected, participation is necessary in order for the grower to be considered in compliance with the program.

Once the on-site visit is complete, the verifier will sit with the grower and review results. Due to the program's spirit of continuous improvement, there are certain practices that are mandatory. If during the verification process, the number of data or practice variations goes above the threshold, the process will be paused and a corrective action plan will be put into place. These plans must be submitted within 30 days and include the issues identified during the visit, provide a timeline for implementation, designate the person responsible for correction, and outline how it will be prevented in the future.

Only when all issues are addressed during the specified timeline are the verifications considered complete and successful. At this point a confirmation valid for one year is provided outlining volumes of cotton involved, changes against the sustainability metrics, and the list of the participating growers.

The Trust Protocol understands the importance of both second and third-party verification that allows growers to understand gaps between self-reporting and actual data as well as provides assurances to brands and retailers on the sustainability of their raw cotton sourcing.

To read more, **click here**.

U.S. COTTON TRUST PROTOCOL®
Trust in a smarter cotton future

U.S. Cotton Growing Regions

West

Southeast

Southwest

Midsouth

AN EXAMPLE SHOWING WORK IN PRACTICE				
REGION	**# OF GROWERS**	**LOW RISK** (calculation) = grower visits	**MEDIUM RISK** (calculation) = grower visits	**HIGH RISK** (calculation) = grower visits
Southeast	96	(4.89) = **5**	(7.34) = **7**	(9.7) = **10**
Midsouth	87	(4.6) = **5**	(6.99) = **7**	(9.3) = **9**
Southwest	169	(6.5) = **7**	(9.75) = **10**	(13) = **13**
West	43	(3.2) = **3**	(4.91) = **5**	(6.55) = **7**
TOTALS	395	20	29	39

Calculations

Low Risk = square root of grower group x .5

Medium Risk = square root of grower group x .75

High Risk = square root of grower group

The graph example is for second-party verification. Third party verification uses the square root of the number of growers by region.

Learn more at
trustuscotton.org