



The U.S. Cotton Trust Protocol *Claims Framework*

Version 3.1 — September 2026



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

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Section A: General information

A1. About the U.S. Cotton Trust Protocol

The U.S. Cotton Trust Protocol is the voluntary sustainability program for U.S. cotton growers and traceability platform for all U.S. Cotton.

The U.S. Cotton Trust Protocol's mission is to create a sustainable standard for U.S. Cotton that is data-powered, traceable by design, and generates positive impact through the global cotton value system – from farms to finished product.

Our vision is to be the world's most trusted fiber program where full traceability is a reality and continuous, measurable improvement of our environmental footprint sets the standard for the global market.

Read more about our program [on our website](#).

A2. Terms and Definitions

Refer to effective version of **U.S. Cotton Trust Protocol Terms and Definitions** for the definition of terms used in this manual. Defined terms are highlighted in italics in the first instance they are used in this document. **Bolded** terms are names of other U.S. Cotton Trust Protocol normative documents.

Executed Claim: A claim used in market-facing materials based on an approved claim.

U.S. Regen™ Cotton: Produced by U.S. Cotton Trust Protocol member growers who meet regenerative agriculture criteria as defined by the U.S. Cotton Trust Protocol's Integrity Framework.

Field Partners: U.S. Cotton Trust Protocol Members, typically marketing cooperatives, merchants and Self-marketing Producers, who work directly with U.S. cotton growers to source cotton. They are responsible for identifying eligible growers, facilitating program participation, and marketing the U.S. Regen™ Cotton to U.S. Cotton Trust Protocol member brands.

Field Partner Programs: The name of the U.S. Cotton Trust Protocol program that delivers regenerative U.S. cotton bales to the market as 'U.S. Cotton Trust Protocol Regenerative Cotton' or 'U.S. Regen™ Cotton' and is supported by the U.S. Cotton Trust Protocol Integrity Framework and verification program assurance processes.'

U.S. Cotton Trust Protocol Integrity Framework: The current draft integrity standard developed by the U.S. Cotton Trust Protocol that describes regenerative practices recognized under Field Partner Programs. The framework also defines how Field Partners, the Trust Protocol, and assurance providers work together to deliver program verification integrity and credibility.

A3. About the Claims Framework

A3.1 Introduction and Scope

This document is designed to govern and provide guidance to all members of the U.S. Cotton Trust Protocol when communicating their commitment to the U.S. Cotton 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 validated and credible *U.S. Cotton Trust Protocol Claims* are made, protecting the reputations of all parties involved but also creating strong tools that will enable robust impact communications regarding the U.S. Cotton Trust Protocol.

A3.1.1 This document allows for, but is not limited to, application used with the following communications channels:

- a. **Stakeholder-facing:** Company website and sustainability/CSR pages
- b. **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
- c. **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-Retail Members, but also will be governed by higher levels of criteria for eligibility as defined in this framework.
 - **Target audiences:** Consumers

A3.1.2 U.S. Cotton Trust Protocol claims are available to all members, with enhanced claims accessible to Brand-Retail members consuming *Protocol Consumption Units (PCCUs)*. A quick reference guide to marketing claims is provided in [Appendix A](#).

- Once enrolled and on-boarded into the U.S. Cotton Trust Protocol, Brand-Retail Members can access verified data related to environmental outcomes of the U.S. Cotton Trust Protocol program and enhanced supply chain transparency. With access to this data, Brand-Retail members could more credibly and effectively communicate to their stakeholders about the environmental outcomes associated with their consumption of eligible material, enhanced visibility into their supply chains, their commitment to sustainable practices and products, and their company's alignment with the core principles of the U.S. Cotton Trust Protocol.

A3.1.3 The U.S. Cotton Trust Protocol Chain of Custody Requirements provide the necessary measures to control the movement of products that contain *Protocol Cotton* and *Tracked U.S. Cotton* purchased and sold by U.S. Cotton Trust Protocol members, in order to demonstrate and validate the claims made about those products.

A3.1.4 The *Protocol Consumption Management Solution (PCMS)* harnesses distributed ledger 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 Tracked 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 Tracked U.S. Cotton or Protocol Cotton.

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

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

A3.2 Changes to the Claims Framework in this version (v3.0 to v3.1)

1. Purpose of this Update

This interim update introduces targeted revisions to the U.S. Cotton Trust Protocol Claims Framework V3.0 (June 2025) to:

- Align with regulatory expectations (FTC, EU Green Claims)
- Strengthen consistency and clarity of product claims
- Integrate U.S. Regen™ Cotton claims into the core framework
- Introduce guidance for combined Supima and U.S. Cotton Trust Protocol claims
- Enhance claims governance, monitoring, and accountability

These updates will be incorporated into Claims Framework v4.0.

Section	Clause	Change
Terms & definitions	A2	New defined terms — ‘Executed Claim’, ‘U.S. Regen™ Cotton’, ‘Field Partner’, ‘Field Partner Programs’, ‘Trust Protocol Integrity Framework’.
Member responsibilities	C2.2 (new)	New clause on execution of claims (wording matches approved claim; applied only to eligible products; no meaning-altering modification).
Regulatory due diligence	C2.3	Expanded/refreshed regulatory references; new markets (Japan, Australia, South Korea); FTC ‘Made in USA’ Labeling Rule added.
Period of validity	C3.4	Claims validity increased from 12 to 18 months; non-renewed claims deemed non-compliant.
Consumer-facing statements	E3.2	Generalized sustainability example statement removed; remaining examples re-lettered.
On-product claims	E4.3 / E5.3	‘Made from’ > ‘Made with’; controlled-blend threshold clarified to ≥50% with rounding; ‘exclusive of trims’ moved into primary claim copy.
U.S. Regen™ Cotton & Field Partner Programs	E8 (new)	New claims section for Field Partner Programs (2025 pilot); B2B, reporting and on-product content claims; prohibited representations; substantiation.
Combined Trust Protocol + Supima claims	Appendix B (new)	Combined claims guidance for the four Supima fiber tokens tracked via the AQRe® Project.

Section B: Allowed Claims

B1. Overview: U.S. Cotton Trust Protocol Statements and Claims

The table below sets out the claims categories covered by this document. This is intended to provide a quick reference to claims eligibility by member type. Please refer to specific sections in this document as outlined in the table to see additional claims requirements.

Claim type (Document section)	Non- members	Supporting members	Grower participants	Aggregator members	Mill & Manufacturer members	Brand & Retail members	Brand & Retail members consuming PCCUs
a. Statements							
i. General statements (Section D)	✓	✓	✓	✓	✓	✓	✓
ii. Participation statements (Section D and E1)	✗	✓	✓	✓	✓	✓	✓
iii. Program outcome statements (Section E2)	✗	✗	✗	✗	✗	✗	✓
iv. Consumer-facing statements (Section E3)	✗	✗	✗	✗	✗	✗	✓
b. Claims							
i. Consumption claims (Section B3)	✗	✗	✗	✗	✗	✗	✓
ii. On-product claims (Section E4)	✗	✗	✗	✗	✗	✗	✓
iii. Use of assigned environmental metrics (Section E6)	✗	✗	✗	✗	✗	✗	✓

B2. Statements

B2.1 General statements: 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 U.S. Cotton 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 U.S. Cotton Trust Protocol membership. The U.S. Cotton Trust Protocol name, logo and all related intellectual property are protected under trademark laws.** See example statements and guidance in [Section D](#).

B2.2 Participation statement: Specific to your category of membership and are intended to support members in communicating their support for, participation in, and commitment to, the U.S. Cotton Trust Protocol program to a range of audiences. See example statements and guidance in [Section D](#) and [Section E1](#).

B2.3 Program Outcome Statement: 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 Statement 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 Statement, members must have publicly communicated their participation. See example statements and guidance in [Section E2](#).

B2.4 Consumer-facing statements: Statements intended to support customer (consumer) facing communication about the U.S. Cotton Trust Protocol and a member's participation in it through brand and retailer marketing and social media channels. **These statements can only be used by Brand-Retail Members actively consuming PCCUs.** Ahead of making a customer facing statement, members must have made public-facing statements communicating their membership and participation in the U.S. Cotton Trust Protocol. See example statements and guidance in [Section E3](#).

B3. Consumption Claims

Consumption claims may be used by U.S. Cotton Trust Protocol members that record all *eligible material* transactions in the PCMS, as outlined in the **Chain of Custody Requirements**. Consumption claims require consumption of PCCUs.

Claim type	Description of claim	Only Brand & Retail members consuming PCCUs
Consumption claims	Claims that communicate a member's specific volume of Tracked U.S. Cotton and/or Protocol Cotton fiber, consumed in any given time period.	✓
On-product claims: Tracked U.S. Cotton or Protocol Cotton	Claims attached physically, visually or by inference to an individual finished product and communicated via consumer-facing channels. See additional requirements for Tracked U.S. Cotton in Section E4 . See additional requirements for Protocol Cotton in Section E5 .	✓
Use of assigned environmental metrics	Use of proportionately assigned environmental metrics to support or contribute to relevant corporate reporting. See requirements for use of <i>assigned environmental metrics</i> in Section E6 .	✓

B3.1 Consumption claims: Claims that communicate a member's specific volume of Tracked U.S. Cotton and/or Protocol Cotton fiber, consumed via PCCUs in any given time period.

- a. Consumption claims shall align with the U.S. Cotton Trust Protocol **Chain of Custody Requirements**.
- b. Consumption claims are available to Brand-Retail Members and are subject to a review and approval by U.S. Cotton Trust Protocol program managers.

B3.2 On-product claims are consumption claims attached physically, visually or by inference to an individual finished product and communicated via consumer-facing channels.

- a. In order to ensure the credibility and protect the reputations of both the Brand-Retailer Members and the U.S. Cotton Trust Protocol, these claims will be subject to more stringent prior approvals than all other claims.
- b. On-Product Claims can fall within two (2) distinct categories:
 - **On-Product Program Participation Statements:** defined as statements that communicate to consumers the Brand- Retailers' participation, support and commitment to the U.S. Cotton Trust Protocol program.
 - **On-Product Content Claims:** defined as claims that look to communicate consumption of Tracked U.S. Cotton or Protocol Cotton fiber within specific products.

Section C: Claims Approval and Labeling Guidelines

C1. Claims Approval Process

C1.1 Members are required to notify the U.S. Cotton Trust Protocol of their intention to make public participation statements and claims using the ‘marketing claims’ function in the PCMS system. The request should detail:

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

C1.2 U.S. Cotton Trust Protocol staff will aim to respond to claims approval requests within five working days and reserves the right to:

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

C1.3 Approved claims will receive an approved claims reference number which should be quoted by the applicant.

C2. Use of Claims: Member Responsibilities

C2.1 Legal due diligence: As a condition of membership and use of the 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 Tracked U.S. Cotton and/or Protocol Cotton fiber.

- a. The U.S. Cotton Trust Protocol does not provide legal advice or counsel to Members concerning their compliance with applicable law in the jurisdictions in which they operate.
- b. This Claims Framework is not intended to serve as nor should be relied upon as providing legal advice or guidance.
- c. 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 compliant following language translation.
- d. Members are responsible for ensuring:
 - Execution of claims matches approved wording
 - Claims are applied only to eligible products
 - No modification alters the meaning of the claim

NOTE: The U.S. Cotton Trust Protocol does not link the source of any particular volume of Tracked 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 U.S. Cotton Trust Protocol farm.

C2.2 Regulatory due diligence: 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.

Examples of relevant guidance include (but are not limited to):

Market	Example guidance (non-exhaustive)
International	ISO 14020:2022; ISO 14021:2016 (Amd 1:2021); ISO 14024:2018; ISO 14025:2006.
United States	FTC 16 CFR Part 260 'Green Guides' (2012); FTC 16 CFR Part 255 Endorsements & Testimonials (2023); FTC 16 CFR Part 323 'Made in USA Labeling Rule' (2021); Textile Fiber Products Identification Act (15 U.S.C. §70) and 16 CFR Part 303; state rules (e.g., California AB 1305, SB 343).
Europe (EU)	Directive (EU) 2024/825 (Empowering Consumers), applied from 27 Sept 2026; Directive 2005/29/EC (UCPD) per Commission Notice C(2021) 9320; Regulation (EU) No 1007/2011 (textile fiber names); proposed Green Claims Directive COM(2023) 166 (status to monitor); France AGECL Law and 'affichage environnemental'.
United Kingdom	Digital Markets, Competition and Consumers Act 2024; CMA Green Claims Code (2021) and Fashion Compliance Guide (2024); Textile Products (Labelling and Fiber Composition) Regulations 2012.
Canada	Competition Act (as amended by Bill C-59, 2024), ss. 74.01(1)(b.1)/(b.2); Competition Bureau 'Environmental Claims and the Competition Act' (2025); Textile Labelling Act.
Japan	Act against Unjustifiable Premiums and Misleading Representations (amended 2024); Household Goods Quality Labelling Act; MoE 'Carbon Footprints Indication Guide' (2025); JIS L 0001:2024.
Australia	Australian Consumer Law (ss. 18 & 29); ACCC 'Making environmental claims' (2023); AANA Environmental Claims Code (2025).
South Korea	Act on Fair Labelling and Advertising (No. 5814); MoE Guidelines for Environmental Labelling and Advertising (rev. 2023).

C2.3 Use of U.S. Cotton Trust Protocol program data: Brand-Retailer Members must adhere to program requirements outlined in the Member Agreement as relates to any use of program data. At no time shall a Brand-Retailer Member communicate that overall program data is representative of their specific actions, fiber consumption, or membership in the U.S. Cotton Trust Protocol.

C2.4 Avoiding misleading claims: By adhering to the claims approval process, Members are better equipped to make sound Claims about the U.S. Cotton Trust Protocol program and any associated environmental or other outcomes.

- Claims should not be disproportionate to Member use of Tracked U.S. Cotton, Protocol Cotton, or participation in the program.
- Any member observing an inappropriate representation of the U.S. Cotton Trust Protocol in the public domain is encouraged to report it to the Protocol program managers.
- Upon discovery of a false claim being made in the public domain, members are obliged to notify Protocol program managers. Further guidance and support to members is available from Protocol program managers on how to address an identified or suspected false claim.

C3. Integrity of Claims: U.S. Cotton Trust Protocol Responsibilities

C3.1 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.

C3.2 Claims monitoring and surveillance: The U.S. Cotton Trust Protocol will monitor the use of member claims in the public domain.

- a. False or misleading claims that violate the Protocol's Code of Conduct and, depending on the circumstances of the violation, could result in termination of a member's U.S. Cotton Trust Protocol membership.
- b. A violation of any applicable laws may also warrant termination of membership.

C3.3 False claims: The U.S. Cotton Trust Protocol reserves the right to request offending organizations to remove claims, take corrective action, and/or to pursue legal action against any organization who engages in non-compliant claims.

C3.4 Period of validity: Member claims approved in the PCMS will be valid for a maximum period of 18 months, after which they must be resubmitted for approval if still required. Non-renewed claims are considered non-compliant.

C4. Labeling Guidelines: Branding and Logo

The U.S. Cotton 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:



Features:

- a. Allows for instant recall and application across digital and physical spaces.
- b. Leaves of the cotton boll now also resemble a check mark. This leaf shape stamps our cotton boll with a symbol of verification.
- c. Members can also request approval of their own colors.

Examples:



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

Section D: General Participation Statements

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

D1. General Statements About U.S. Cotton

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

D1.1 Example statements:

- a. '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.'
- b. 'U.S. cotton has a 35-year history of improving 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.'
- c. '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.'
- d. '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.'

D1.2 Refer to further public sources of information on:

- a. U.S. cotton and on worker well-being.
- b. U.S. Cotton production in the Field to Market: Alliance for Sustainable Agriculture National Indicators Report.

D2. Statements About the U.S. Cotton Trust Protocol Program

D2.1 Describing the program: These example statements are intended to support members and stakeholders in describing or making reference to the U.S. Cotton Trust Protocol program.

- a. 'The U.S. Cotton Trust Protocol is the only sustainable cotton fiber program to bring quantifiable and verifiable measurement to U.S. cotton production and drive continuous improvement in six key sustainability metrics.'
- b. 'U.S. Cotton Trust Protocol farmers are committed to continuously improving their environmental footprint, including water usage, soil diversity and greenhouse gas emissions.'
- c. 'The U.S. Cotton 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.'

- d. '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 double verification process.'
- e. '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.'
- f. '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.'
- g. '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.'

D2.2 Describing the U.S. Cotton Trust Protocol Farming Practices: These example statements describe the farming practices that support positive environmental outcomes in line with the U.S. Cotton Trust Protocol environmental indicators.

- a. 'U.S. Cotton 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.'
- b. 'U.S. Cotton 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.'
- c. 'The U.S. Cotton 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 prioritize the practices that will have the greatest impact on increasing their water use efficiency.'
- d. 'The U.S. Cotton 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.'
- e. 'The U.S. Cotton 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.'
- f. 'The U.S. Cotton 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.'
- g. 'U.S. Cotton 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.'

- h. 'Worker health and safety are priorities for the U.S. cotton industry and the U.S. Cotton 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.'

D2.3 Describing the U.S. Cotton Trust Protocol approach to regenerative agriculture: These example statements describe the farming practices that U.S. Cotton Trust Protocol growers can demonstrate in support of regenerative outcomes. These statements may only be used to describe the U.S. Cotton Trust Protocol program, and do not imply a claim of member action.

- a. 'The U.S. Cotton Trust Protocol encourages practices such as reduced tillage and no-tillage that **minimize soil disturbance** and promote continuous ground cover through cover crops. These actions foster a living soil teeming with microbes, improve water retention, and reduce erosion. This approach is fundamental to regenerative agriculture, as it promotes healthy soil structure, improves nutrient cycling, and enhances overall soil health.'
- b. 'The U.S. Cotton Trust Protocol also encourages practices that prevent soil erosion by maintaining a **continuous cover of plants** or crop residue on the ground. This aligns with regenerative principles, as cover crops help to retain valuable topsoil, improve water infiltration, and create a more resilient ecosystem.'
- c. 'The U.S. Cotton Trust Protocol promotes the use of **Integrated Pest Management** (IPM) strategies. IPM focuses on identifying and managing pests in a holistic way, minimizing reliance on chemical control. This approach aligns with regenerative principles by fostering a healthy ecosystem that promotes natural pest control mechanisms and reduces the need for crop protection product interventions.'
- d. 'The U.S. Cotton Trust Protocol supports the use of the 4R **Nutrient Management** principles: right source, right rate, right time, and right place. This ensures nutrients are applied efficiently, reducing environmental impact, and promoting responsible resource management which is a cornerstone of regenerative agriculture.'
- e. 'The U.S. Cotton Trust Protocol recognizes the importance of **biodiversity** for a healthy ecosystem and encourage practices that create suitable habitats for a variety of native species. This aligns with regenerative principles, as fostering biodiversity contributes to a more balanced and resilient ecosystem, promoting long-term sustainability.'

D2.4 Additional resources: Visit [our website](#) for further resources on the program detail, including principles & criteria for farmers.

Section E: Guidance: Communication of Claims

This section outlines examples of allowed communications for the statements and claims outlined in Section B.

E1. Allowed Member Participation Statements

Member Participation Statements are outlined in Section B2. These example statements are specific to membership categories and are intended to support members in communicating their participation in, and commitment to, the program.

E1.1 Brands and Retailers

- a. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, by measuring outcomes and impact as well as driving innovation in U.S. Cotton production.'
- b. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that measures outcomes and improves impact.'
- c. '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 E.2.6.

E1.2 Brands and Retailers Consuming PCCUs

- a. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, by measuring outcomes and impact as well as driving innovation in U.S. Cotton production.'
- b. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that measures outcomes and improves impact.'
- c. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, the only cotton fiber program to provide field-level environmental data as well as traceability and transparency in the supply chain.'
- d. '[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 improving our environmental footprint and the transparency of our supply chain.'
- e. '[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 better understand our environmental footprint.'
- f. '[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 digitally-enabled Protocol Consumption Management Solution (PCMS).'
- g. '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.'
- h. '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 U.S. Cotton Trust Protocol farms to finished products, as well as supporting U.S. Cotton Trust Protocol growers' efforts towards improving their environmental footprint.'

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

E1.3 Mills and Manufacturers

- a. 'As a member of the U.S. Cotton Trust Protocol [Name] is committed to help drive positive change in sustainable cotton sourcing by building full transparency of our cotton supply chain and supporting best practice in U.S. cotton production.'
- b. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, by measuring outcomes and impact as well as driving innovation in U.S. Cotton production.'

E1.4 Aggregators

- a. '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.'
- b. '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.'

E1.5 Farmers

- a. '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.'
- b. 'I am proud to be among the growers to commit to the U.S. Cotton Trust Protocol, which enables us to measure outcomes and drive innovation in U.S. cotton production. I am using the tools and insights provided by the U.S. Cotton Trust Protocol to ensure our farm is able to track the outcomes of using sustainable practices to improve both our environmental footprint and business resilience.'
- c. '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.'
- d. '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.'

E1.6 Supporters

Any members not participating in the U.S. Cotton Trust Protocol value chain, including donors, foundations, investors, non-consuming brands.

- a. '[Name], is a proud supporter of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, by measuring outcomes and impact as well as driving innovation in U.S. Cotton production.'
- b. '[Name], is a proud supporter of the U.S. Cotton Trust Protocol, a program that measures outcomes and improves impact.'
- c. '[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 U.S. Cotton Trust Protocol to increase soil health and carbon storage, increase biodiversity, and reduce greenhouse gas emissions.'

E2. Allowed Program Outcome Statements

Program Outcome Statements are outlined in [Section B2](#). Program Outcome Statements are intended to be used to describe the overall program achievements and to reference progress of specific environmental metrics and improvements towards environmental goals.

E2.1 Making a program outcome statement associates a member's participation with program outcomes, either in aggregate or in fiber volume-based form, and can only be used by Brand-Retail members actively consuming PCCUs.

E2.2 Ahead of making a program outcome statement, members must have publicly communicated their participation. See participation statements described in [Section B2](#) of this document.

These statements are available to Brand & Retailer members claiming PCCUs.

U.S. Cotton Trust Protocol Annual Report: Information on Latest Program Results

The U.S. Cotton Trust Protocol Annual Report is published to U.S. Cotton Trust Protocol Members, with aggregated program results available to all members and additional impact insights provided to Brand-Retailer members consuming 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 [here](#).

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 statement in accordance with this guidance. Please refer to the guidance in [Section E6](#) on using environmental metric data.

E2.4 Example program statements, based on aggregate data:

- a. '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.'
- b. 'In [year] U.S. Cotton Trust Protocol 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.'
- c. 'In [year] U.S. Cotton 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.'
- d. 'In [year] U.S. Cotton 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.'

- e. '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 group¹

E2.5 Trends claims demonstrate that the sustainability metric results generated by the program are showing directional improvement. This claim provides an interim path to highlight a project's progress before reaching the five years of data required for an Impact claim.

Since 2020 the U.S. Cotton Trust Protocol program has seen a trend towards improvement in these metrics driven by the efforts made by U.S. Cotton Trust Protocol grower members.

- A % water efficiency improvement
- B % GHG emissions reduction
- C % energy use reduction
- D % soil conservation improvement
- E % land use efficiency improvement

E2.6 Example consumption claims. Consumption (volume) claims should have appropriate context applied alongside, relating the statement to the Member's material sustainability impacts, targets and progress.

- [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] tons of U.S. Cotton in [year], tracked through our supply chain by the U.S. Cotton Trust Protocol. Of this volume, [data point] originated from Protocol Farms.

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

¹ Refer to most recent Annual Report for full detail on the baseline

E2.7 Supporting statements. These statements maybe used alongside U.S. Cotton Trust Protocol claims, to provide greater detail to the audience.

- a. '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 on-farm 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].'
- b. '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 U.S. Cotton 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].'
- c. '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 U.S. Cotton Trust Protocol farmers use precision irrigation techniques to minimize the amount of water used. The U.S. Cotton 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.'
- d. '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 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.'
- e. '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 program tracks the practices that Protocol 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 U.S. Cotton 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.'
- f. '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.'
- g. 'At [NAME] we recognize the importance of adopting regenerative practices in agriculture. By participating in the U.S. Cotton Trust Protocol, we are learning from U.S. cotton farmers and their work to adopt a range of practices that support regenerative principles.'

E3. Consumer-Facing Statements and Claims

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

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

E3.1 Ahead of making a customer facing claim, members must have publicly communicated their participation. See ‘participation statements’ ([Section B2.2](#) and [Section E1](#)).

E3.2 Example statements available to all Brand & Retailer members:

- a. ~~‘At [Name], we’re proud to be a member of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, measuring outcomes and driving innovation in U.S. Cotton production.’~~ *NOTE: This terminology is no longer applicable, with generalized sustainability language replaced by more specific claims.*
- b. ‘At [Name], we’re proud to be a member of the U.S. Cotton Trust Protocol, a program that enables us to contribute to a more sustainable and transparent world.’
- c. ‘At [Name], we’re proud to be a member of the U.S. Cotton Trust Protocol, a program that measures outcomes and improves impact.’
- d. ‘At <brand>, we’re proud to be a member of the U.S. Cotton Trust Protocol as part of our commitment to sustainability.’
- e. ‘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.’
- f. ‘At <brand>, we’re proud to be a member of the U.S. Cotton Trust Protocol, the only cotton fiber program to provide verified field-level environmental data as well as traceability and transparency in the supply chain.’
- g. ‘At <brand>, we’re proud to be a member of the U.S. Cotton Trust Protocol, a program which assures that the cotton in our products is responsibly sourced from the USA.’

To support customers in understanding the U.S. Cotton 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. This option does not replace the need for clear and comprehensive claims statements.

E4. On-product Claims for Tracked U.S. Cotton

E4.1 These claims are intended to support consumer facing communication within a product description in the following formats:

- a. e-commerce product page
- b. POS in physical retail locations (stores)
- c. hang tags or physical labels applied to product
- d. sewn in or in-garment printing of labels
- e. product packaging

E4.2 On-product claims for Tracked U.S. Cotton that are not permitted:

- a. Umbrella messaging to suggest that the product is sustainable or has been sustainably produced, unless otherwise evidenced
- b. Generic terms such as ‘eco cotton’
- c. Statement or implication that the cotton can be traced to a specific farm
- d. Reference to specific environmental metrics

These claims are available to Brand & Retailer members consuming PCCUs

E4.3 Product content claim criteria for Tracked U.S. Cotton:

Chain of Custody Model	Fiber content criteria	Permitted Content Claim	Stamp
Segregation	100% Tracked U.S. Cotton*	Made with U.S. Cotton — or — Made from 100% U.S. Cotton	
Controlled blending	≥50% Tracked U.S. Cotton Remaining content from non-cotton fibers and/or certified recycled ² cotton	Blended with (or contains) U.S. Cotton — or — Contains X% U.S. Cotton	

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

*Trims: Where applicable, claims may include: “exclusive of trims”. This shall appear in the primary claim statement, not as subtext.

Example: “Contains 60% U.S. Cotton (exclusive of trims)”

E4.4 Claims related to other provenance fibers blended with Tracked U.S. Cotton are governed by their respective industry standard or certification.

² Recycled cotton, separately certified under schemes that are recognized by Textile Exchange (GRS, RCS)

E4.5 Permitted on-product claims examples for Tracked U.S. Cotton

- This product contains [X]% U.S. Cotton as verified by the U.S. Cotton Trust Protocol.
- The cotton in this product is responsibly sourced from the USA, as verified by the U.S. Cotton Trust Protocol.



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

E4.6 Please submit any new designs via the PCMS member dashboard to the U.S. Cotton Trust Protocol for approval.

E5. On-product Claims for Protocol Cotton

E5.1 These Protocol Cotton claims are intended to support consumer facing communication within a product description in the following formats:

- a. e-commerce product page
- b. POS in physical retail locations (stores)
- c. hang tags or physical labels applied to product
- d. sew in or in-garment printing of labels
- e. product packaging

E5.2 On-product claims for Protocol Cotton that are not permitted:

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

These claims are available to Brand & Retailer members consuming Protocol Cotton, tracked through the PCMS system as physically originating from U.S. Cotton Trust Protocol Farms.

E5.3 Product content claim criteria for Protocol Cotton:

Chain of Custody Model	Fiber content criteria	Permitted Content Claim	Stamp
Segregation	100% tracked Protocol Cotton*	Made from Protocol Cotton — or — 100% Protocol Cotton	
Controlled blending	>50% tracked Protocol Cotton Remaining content from Tracked U.S. Cotton, non-cotton fibers and/or certified recycled ³ cotton	Blended with (or contains) Protocol Cotton — or — Contains X% Protocol Cotton	

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

*excluding trims

E5.4 Claims related to other provenance fibers blended with Tracked U.S. Cotton are governed by their respective industry standard or certification.

³ Recycled cotton, separately certified under schemes that are recognized by Textile Exchange (GRS, RCS)

E5.5 Permitted on-product claims examples for Protocol Cotton:

- This product contains [X]% Protocol Cotton, a program that aims to contribute to a more sustainable and transparent world, measuring outcomes and driving innovation in U.S. Cotton production.
- This product contains [X]% Protocol Cotton, from farmers in the U.S. committed to continuously improving their environmental footprint, including water usage, soil diversity and greenhouse gas emissions.



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

E5.6 Please submit any new designs via the PCMS member dashboard to the U.S. Cotton Trust Protocol for approval.

E6. Use of Assigned Environmental Metrics

E6.1 U.S. Cotton Trust Protocol data is designed to help Members meet their sustainability goals. The data can be used for:

- a. **Science-Based Targets for Nature (SBTN) Target Setting:** U.S. Cotton Trust Protocol metrics align with SBTN targets for freshwater, land, biodiversity, and climate, providing data for setting and tracking progress towards science-based goals.
- b. **Corporate Sustainability Reporting Directive (CSRD) Benchmarking:** U.S. Cotton Trust Protocol data can be used to benchmark performance against CSRD requirements, demonstrating transparency and accountability in sustainability reporting.
- c. **Scope 3 Reporting:** U.S. Cotton Trust Protocol provides data on emissions from cotton cultivation, enabling brands to accurately report their Scope 3 GHG emissions and track progress towards reduction targets.

E6.2 Brand-Retail Members consuming PCCUs may use program data in accordance with the guidance set out below:

- a. **Absolute values:** Brand-Retail Members consuming 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 U.S. Cotton Trust Protocol environmental metrics into a brand-retail member's raw material footprint calculation is carried out under the member's own responsibility and should follow appropriate GHG Protocol or SBTi guidance.
 - In line with current GHG Accounting Protocol, U.S. Cotton Trust Protocol aggregate program emissions factors can be applied as primary data in the case of Protocol Cotton consumption, and as secondary data in the case of Tracked U.S. Cotton consumption.
 - 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.'
- b. **Product Footprint Calculation:** Brand-Retail Members consuming PCCUs may use U.S. Cotton Trust Protocol datasets available through approved material or product foot printing tools, such as the [Worldly Higg Product Tools](#).
 - U.S. Cotton Trust Protocol aggregated program metrics may be used as Lifecycle impact assessment (LCIA) equivalent data to represent the raw material footprint of Tracked U.S. Cotton fiber consumed through the U.S. Cotton Trust Protocol program. The expected use case is for U.S. Cotton Trust Protocol Member Brands (the 'user') to be able to model product environmental impacts using their own- or third-party foot printing tools, applying Protocol program data to their use of Protocol Cotton or Tracked U.S. Cotton.
 - By prior agreement, 3rd party environmental modeling tools and platforms may use the U.S. Cotton Trust Protocol program metrics to model or calculate the footprint of textile materials or finished products where the 'user' is both a member of the U.S. Cotton Trust Protocol and has sourced and tracked eligible U.S. Cotton fiber into the finished product.
 - Third-party platforms shall share their methodology for data modeling with U.S. Cotton Trust Protocol in advance, such that both parties can align on data parameters and transformations, maintaining a truthful and consistent view of program data.
 - Product foot printing party platforms must demonstrate third-party certification of their methodology in line with the Greenhouse Gas Reporting Protocol, along with in house expertise in lifecycle assessment (LCA).

Contact the U.S. Cotton Trust Protocol team for more information on the latest tools approved for Trust Protocol data use, or to request agreement for data use in a specific application.

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

E6.3 Use of assigned environmental metrics that is not allowed:

- a. The U.S. Cotton Trust Protocol does not allow its environmental metric results to be used in comparative statements to past consumptions and associated environmental metric data from other sources/programs.
- b. The U.S. Cotton 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.
- c. Public communication referencing a comparison of U.S. Cotton Trust Protocol data to data from any other source, or asserting a comparative 'improvement' Claim is not permitted.

E6.4 The U.S. Cotton Trust Protocol endeavors 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.

E7. Brand-Retailer Transfer

E7.1 Brands consuming PCCUs are able to transfer U.S. Cotton Trust Protocol traceability data alongside the transfer of related articles (finished products) to another brand or retail trading partner, supporting product related claims.

System capability supports partial automation, with anticipated enhancements to this functionality during 2025.

Separate guidance is available on 'how' to complete this transfer. Please contact your Trust Protocol account team for guidance on this process if it is relevant to your operation.

E7.2 At this time, Brands can transfer the following:

- a. PCCUs with accompanying environmental metric data
- b. Accompanying product identification and volume data

E7.3 Brands cannot currently transfer:

- a. PCCU volumes / Environmental metric data already used in a public claim/report by initial brand
- b. Traceability data

E7.4 Prerequisites:

- a. All parties must be U.S. Cotton Trust Protocol members
- b. Products to be transferred must have already had PCCU claims executed and approved by a U.S. Cotton Trust Protocol Program Manager before transfer to recipient brand
- c. All PCCUs to be transferred must have been recognized in the donor brand's PCMS dashboard
- d. PCCUs may only be transferred when the associated goods/articles are also being traded

E.8 (New): Making Claims About U.S. Regen™ Cotton and Field Partner Programs

For the purpose of claims under this section, U.S. Regen™ Cotton refers to cotton originating from farms verified under the U.S. Cotton Trust Protocol Integrity Framework for adoption of specified regenerative farming practices and tracked through the PCMS traceability system and chain-of-custody requirements. Regenerative status reflects verified practice adoption at farm and field level. It does not represent quantified environmental outcomes unless separately approved under Section E2.

E8.1 Eligibility

Regenerative claims shall only be used where: cotton originates from verified regenerative farms; bales are segregated and traceable; chain of custody is maintained through the PCMS; and volume reconciliation is complete.

E8.2 Business-to-business marketing claims

To support members in scaling uptake of U.S. Regen™ Cotton, business-to-business marketing claims are supported, for example:

- '[Field Partner name] supplies U.S. Regen™ Cotton verified according to the requirements of the U.S. Cotton Trust Protocol Integrity Framework.'
- 'Cotton produced by growers meeting Regenerative Practice Requirements defined in the U.S. Cotton Trust Protocol Integrity Framework.'
- 'U.S. Regen™ Cotton is traceable throughout the value chain of U.S. Cotton Trust Protocol member brands and retailers, through the program's proprietary solution.'

E8.3 Field Partner Program reporting claims

The U.S. Cotton Trust Protocol aligns with the principles of the Textile Exchange Guide to Regenerative Outcome Claims (adapted from ISEAL), enabling three types of public-facing reporting claim:

Commitment claims set out commitments to regenerative agriculture actions or outcomes. Commitment claims shall include: who is making the commitment; who and what will be changed; the scale of change; time-bound actions; and clear targets and intended results.

Action claims relate to specific actions taken or practices implemented, describing scope, scale, intended change and timing, supported by links to outcomes, a contextual reference point, co-funders/partners, a monitoring system, verification (if applicable) and publicly accessible information.

E8.3.3 Performance claims

Concern change realized or progress toward regenerative outcomes, are only possible over an extended time frame, require additional assurance evidence, and will not apply to the 2025 Regenerative Program Pilot.

E8.4 Permitted on-product content claims

E8.4.1 Claims shall clearly communicate the percentage of U.S. Regen™ Cotton in the finished product.

Chain of Custody Model	Fiber content criteria	Permitted Content Claim	Stamp
Segregation	100% tracked U.S. Regen™ Cotton*	Made with (or Contains) U.S. Regen™ Cotton, exclusive of trims* — or — 100% U.S. Regen™ Cotton, exclusive of trims*	
Controlled blending	Minimum 50% tracked U.S. Regen™ Cotton, rounded to the nearest whole number; remaining content from Tracked U.S. Cotton, Protocol Cotton, non-cotton fibers and/or certified recycled cotton (GRS/RCS).	Blended with (or Contains) U.S. Regen™ Cotton — or — Contains X% U.S. Regen™ Cotton	

E8.4.2 Claims shall be accompanied by one of the following clarifying statements, either on-product or accessible via QR code or digital product page:

- “U.S. Regen™ Cotton is sourced from farms verified for the adoption of regenerative production practices under the U.S. Cotton Trust Protocol Integrity Framework.”
- “U.S. Regen™ cotton is sourced from U.S. farms verified for regenerative practice adoption and tracked through the U.S. Cotton Trust Protocol chain of custody.”
- “U.S. Regen™ Cotton comes from U.S. farms verified for adopting practices that support soil health, biodiversity, and responsible resource use.”
- “U.S. Regen™ Cotton is grown on U.S. farms verified for adopting specific regenerative farming practices such as conservation tillage, cover cropping, crop rotation, and responsible nutrient and pest management. These practices are designed to support soil health, biodiversity, and long-term farm resilience.”
- “U.S. Regen™ cotton in this product is sourced from farms verified under the U.S. Cotton Trust Protocol Integrity Framework as adopting regenerative farming practices. Learn more about what regenerative means in our program at [link/QR code]”.

Expanded text recommended for EU market:

- “U.S. Regen™ Cotton is grown on U.S. farms verified for adopting specific regenerative farming practices such as conservation tillage, cover cropping, crop rotation, and responsible nutrient and pest management. These practices are designed to support soil health, biodiversity, and long-term farm resilience. Regenerative status reflects verified practice adoption at the farm and field level and does not represent a quantified environmental impact claim for this product.”

E8.5 Prohibited Representations

E8.5.1 Members shall not:

- a. Describe U.S. Regen™ Cotton as “certified regenerative” or infer third party endorsement
- b. Imply that the finished product itself is regenerative or regenerative certified
- c. Make quantified environmental outcome claims at product level (including carbon sequestration, greenhouse gas reduction, biodiversity increase, soil carbon increase, water reduction, or similar) at product level
- d. Imply that cotton in a specific product originates from a specific farm or grower
- e. Make comparative or superiority claims (e.g., “more regenerative than conventional cotton”)
- f. Use unqualified environmental benefit statements such as “better for the planet,” “climate positive,” or similar broad claims in connection with U.S. Regenerative Cotton content.
- g. Associate visual elements, iconography or color schemes that imply environmental benefit beyond that substantiated by the verified practice adoption claim.

E8.6 Substantiation and Documentation Requirements

E8.6.1 All regenerative on-product claims shall be supported by:

- a. Chain of Custody records maintained within the PCMS;
- b. Volume reconciliation demonstrating percentage accuracy for the claimed content.

E8.6.2 The U.S. Cotton Trust Protocol reserves the right to request additional documentation at any time to validate the accuracy of regenerative content claims.

E8.6.3 Approved regenerative claims are valid for a maximum period of 18 months, consistent with Claims Framework Section C3.4.

E8.7 Relationship to Program Outcome Statements

E8.7.1 On-product regenerative content claims under this section communicate verified practice adoption only.

E8.7.2 Program outcome statements referencing aggregate environmental metrics shall follow the requirements of Section E2 and shall not be presented in a manner that implies product-specific quantified environmental performance.

Appendix A

A1. Quick Reference Guide to Marketing Claims

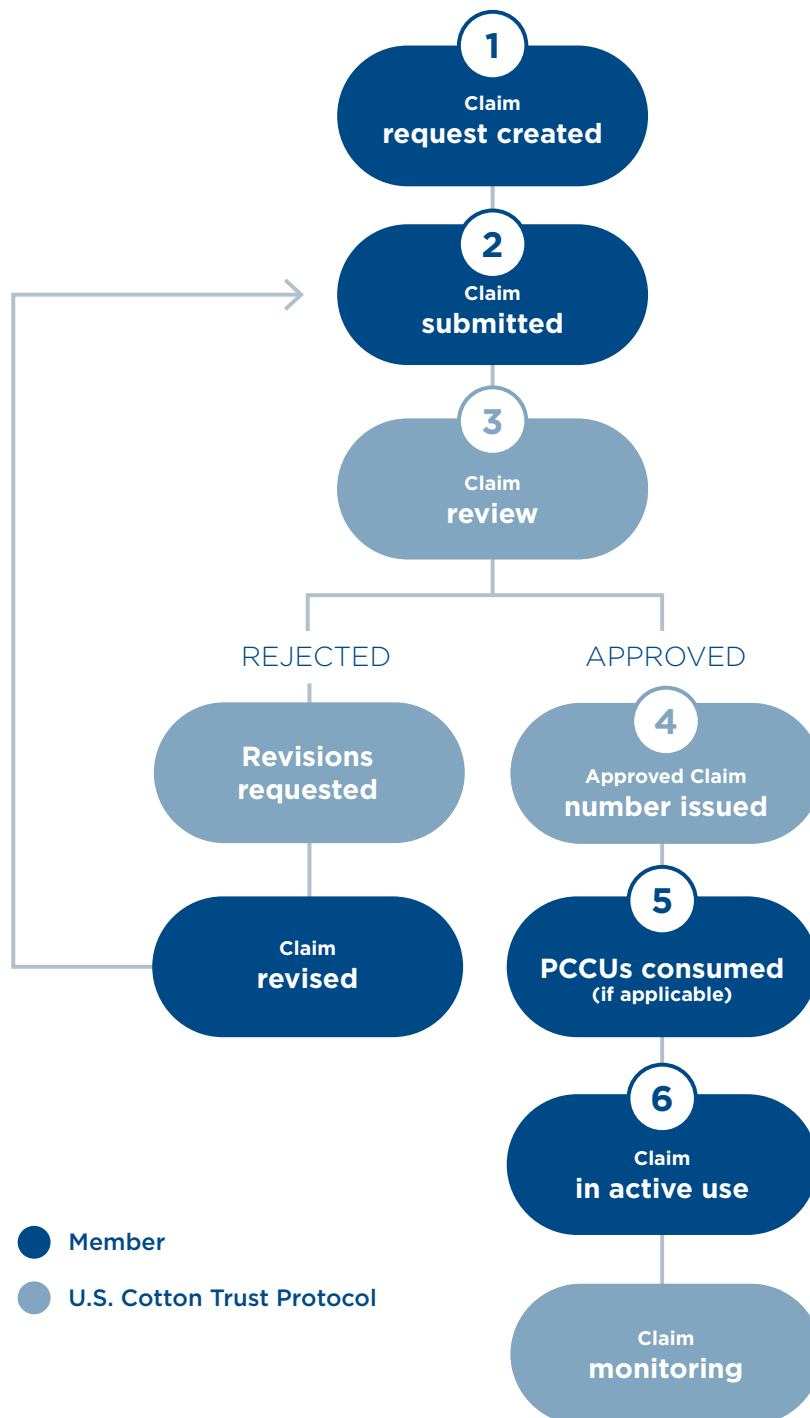
Please refer to the detail in this document for full guidance on creating an approved claim.

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 Tracked U.S. Cotton or Protocol Cotton	✓ Permitted	✓ Permitted	× Not permitted
Product content claim	✓ Permitted	✓ Permitted	✓ Permitted
Volume related environmental metrics	× Not permitted	× Not permitted	× Not permitted

*only where the product contains Tracked U.S. Cotton or Protocol Cotton, meeting the criteria defined in the 'on product claims' rules.

A2. Process Overview

U.S. Cotton Trust Protocol members should request and manage marketing claims online, through the PCMS dashboard. This provides tracking and archiving of agreed language and associated documents/assets, as well as ensuring a timely response from the U.S. Cotton Trust Protocol reviewing team.



Appendix B (new): Combined Claims of U.S. Cotton Trust Protocol and Supima Cotton Fiber

The U.S. Cotton Trust Protocol and Supima are collaborating to enhance cotton supply chain traceability and provide access to farm-level data that drives continuous improvement on U.S. cotton farms. Both the U.S. Cotton Trust Protocol and Supima have built robust traceability solutions that are harnessing the strong foundation of the USDA's Permanent Bale Identification (PBI) system as well as robust traceability and transparency technology delivered by the TextileGenesis platform to empower brands visibility into their products and supply chain.

U.S. Cotton Trust Protocol brand and retailer members can track Supima's four distinct fiber tokens, Supima, Supima Protocol, Supima Organic and Supima Regenerative into their finished products under the Supima AQRe® Project and claim Protocol Consumption Units in the same manner they do under the U.S. Cotton Trust Protocol® program.

Definitions (to be included in the next update to U.S. Cotton Trust Protocol Terms and Definitions):

There are 4 fiber types available for **U.S. Cotton Trust Protocol members** to source as Supima extra-long staple fiber under the Supima brand, tracked⁴ and eligible for **Protocol Consumption units**.

Terms	Definitions
Supima	Supima cotton tracked and verified via the AQRe® project, eligible for U.S. Cotton Trust Protocol Consumption Units (PCCUs).
Supima Protocol *U.S. Cotton Trust Protocol controlled term*	Supima cotton produced by a U.S. Cotton Trust Protocol grower, tracked and verified via the AQRe® project, eligible for Protocol Consumption Units (PCCUs).
Supima Organic	Organic Supima cotton produced by a certified organic grower, tracked and verified via the AQRe® project, eligible for Protocol Consumption Units (PCCUs).
Supima Regenerative	Organic Supima cotton produced by a certified regenerative grower, tracked and verified via the AQRe® project, eligible for Protocol Consumption Units (PCCUs).
Pima (extra-long staple American Pima)	American Pima fiber grown in the U.S. but not using the SUPIMA® trademark or the AQRe® Project platform, is eligible for tracking ⁵ and associated claims through the U.S. Cotton Trust Protocol - refer to program documents for more information.

4 Supima Fiber shall be tracked through 'path 1 - AQRe® project to be eligible for SUPIMA® brand marketing claims and to be eligible for Protocol Consumption Units (PCCUs)

5 American Pima cotton outside of the AQRe® Project platform shall be tracked by 'path 2 - PCMS' to be eligible for U.S. cotton or Protocol Cotton marketing claims