



Standard-Setting Procedure: The U.S. Cotton Trust Protocol

Version 1.0 - May 2025

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Section A- Introduction

A1. 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 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 [here](#).

The U.S. Cotton Trust Protocol provides a set of voluntary sustainability principles and criteria for U.S. cotton growers in order to promote achievement of social and environmental management practices aligned with global regulatory requirements and market needs. The program serves as guidance for best practices and uses a framework emphasizing continuous improvement within the farming operation. The Trust Protocol drives change by encouraging environmental preservation, ensuring fair treatment of workers, and demonstrating U.S. cotton's commitment to be an environmentally sound and responsibly produced product. The Trust Protocol also incorporates tools developed by the Field to Market program and other partners to measure sustainability metrics.

The Trust Protocol is a non-profit governed by a multi-stakeholder board of directors including growers, brands/retailers, civil society representatives from conservation and wildlife initiatives, ginners, merchants, marketing cooperatives, textile manufacturers, and cottonseed crushers/handlers. The mission is to meet U.S. cotton customers' sustainability needs and to provide transparency about cotton industry efforts to promote grower economic livelihood, environmental stewardship, caring of people and community, and personal and corporate integrity.

A2. Objective of the Program

The Trust Protocol provides a voluntary mechanism to support individual cotton grower management programs and communicate common elements of best management practices.

The Trust Protocol was developed as a platform for measuring environmental impact and assuring rights of workers while maintaining profitability. The objective of the program is to meet the evolving requirements of the three pillars of sustainability for the U.S cotton industry relevant to economics, environment, and social standards, while assuring continuous improvement.

A3. Guiding Principles

A3.1 To have the largest positive impact at scale, program objectives must be reasonably achievable by growers, encourage use of best available technology, have a positive effect on environmental metrics (land, water, and air) and provide tangible market access incentives through brand and retail customer acceptance.

A3.2 To drive change at the national scale and engage the majority of cotton acres in the U.S.

A3.3 To help the U.S. cotton industry achieve their national established sustainability goals, initiated with 2025 targets established for land use, energy use, greenhouse gas emissions, water use, soil conservation, and soil conditioning index (soil carbon).

A3.4 To assure employee health and safety with an emphasis to meet or exceed all national standards regarding labor rights, workplace conditions, and fundamental principles of employment conditions. Additional assurance to legal enforcement of U.S. worker health and safety requirements is provided by the Trust Protocol's second and third-party assurance.

A3.5 To enhance profitability for cotton growers by supporting the adoption of best management practices that improve soil, water, and climate resilience. The Trust Protocol also supports growers in identifying opportunities for continuous improvement.

Section B- Objectives of this document

B1 The objectives of this procedure are to establish clear and measurable sustainability criteria for cotton production under the U.S. Cotton Trust Protocol.

B1.1 Ensure stakeholder engagement throughout the standard-setting process.

B1.2 Align the standard with relevant international sustainability frameworks (e.g., UN Sustainable Development Goals, UN Guiding Principles on Business and Human Rights).

B1.3 Ensure the standard is practical, achievable, and measurable at the field level.

Section C- Scope

C1 This procedure applies to the creation, revision, and approval of sustainability standards for cotton production at the field level. Standards shall be written to enable monitoring and evaluation of the objectives of the program. It covers aspects such as:

- Environmental sustainability (e.g., soil health, water usage, nutrient management).
- Social sustainability (e.g., labor rights, community engagement, worker welfare).
- Economic sustainability (e.g., farm management, market access).
- Chain of Custody (fiber traceability)
- Marketing and communication (claims)

C2 Conformity criteria within the standard shall:

C2.1 Be linked to the goals and desired outcomes identified in the approved project plan or strategy;

C2.2 Be clear, objective, and verifiable;

C2.3 Be informed by best available science related to achieving the desired outcomes identified in the project plan or strategy, as well as by regulatory and market considerations; and

C2.4 Not seek to restrict trade in any way or give preference to one region, technology, or company over another.

C2.5 At minimum, the standard shall be accompanied by:

C2.5.1 Guidance for local applicability where necessary or helpful (e.g. varying farm management practices across the U.S. Cotton Belt);

C2.5.2 An accompanying user manual to give further guidance for participating organizations;

C2.5.3 Verification procedures to set guidelines for the responsible assurance body.

Section D- Roles and responsibilities

D1. U.S. Cotton Trust Protocol

D1.1 The U.S. Cotton Trust Protocol is overseen by a multi-stakeholder Board of Directors. This Board includes representatives from various sectors: brands and retailers, civil society and independent sustainability experts, as well as the cotton-growing industry, encompassing growers, ginner, merchants, wholesalers, cooperatives, mills, and cottonseed handlers. The Board meets on a quarterly basis.

D1.2. Providing strategic guidance and input for the Trust Protocol, the Board of Directors helps shape the Trust Protocol's mission and improve resiliency of U.S. cotton production with the goal of driving value for all members.

D1.3 The U.S. Cotton Trust Protocol Standard Setting Committee (SSC) review committee, having responsibility for standard development/revision processes, shall be comprised of the following:

- Trust Protocol President/CEO
- Trust Protocol Standards Lead
- Trust Protocol Board Director representative
- National Cotton Council of America representative
- Cotton Incorporated representative
- Independent sustainability expert

D1.4 The Trust Protocol shall play the role of secretariat for all standard development and revisions or designate another party to do so.

D1.5 The Trust Protocol Secretariat is responsible for:

- Coordinating standard development and revision processes
- Supporting the Board of Directors and Technical Committee
- Facilitating stakeholder engagement and consultation
- Ensuring the integrity and transparency of standard-setting processes
- Communicating changes and updates to stakeholders
- Maintaining documentation and records

D1.6 During the development and revision process, the secretariat participation and contribution shall include staff members from various areas of knowledge and management of Trust Protocol standards, including assurance, communication, climate impact, data collection, and stakeholder engagement.

D1.7 The Technical Committee (TC) serves as the primary advisory body for standard development and revisions, with responsibilities including:

- Reviewing proposed changes and providing technical expertise
- Ensuring the standard remains scientifically sound and practically implementable
- Analyzing feedback from stakeholders and field implementation
- Recommending final drafts to the Board of Directors for approval
- Guiding the strategic evolution of the standard

D1.8 The Trust Protocol shall be responsible for the following, with regard to the standard development/revision:

- Selecting members for the TC according to experience, subject matter expertise, and stakeholder representation for the corresponding processes
- Keeping information about the standard development or revision process publicly available, including, at minimum, details on the scope of the revision, estimated timeline, and how to participate
- Keeping details and records of all standards development and revision activities for a minimum of five years, and available to stakeholders upon request

D2. Technical Committee (TC)

D2.1 The development of Trust Protocol standards shall be accompanied by a Technical Committee (TC) of individuals and representatives of companies/organizations appointed by the board of directors of Trust Protocol who have agreed to volunteer their time.

D2.2. TC membership shall normally be comprised of the following stakeholder representatives:

| Type of Organization | Number of Members |
|-----------------------|-------------------|
| Brand/Retailer | 2 |
| Mills & Manufacturers | 1 |
| Cotton growers | 2 |
| Coops & Merchants | 1 |
| NGOs & Academia | 1 |
| Data innovations | 1 |
| ISEAL best practice | 1 |
| Total | 9 |

D2.3. TC members shall sign a charter outlining their roles, responsibilities, and expectations for participation. The charter shall include:

- Goals and scope of the TC's work
- Confidentiality requirements
- Meeting expectations and time commitments
- Decision-making procedures
- Conflict of interest disclosures

D2.4. The TC will typically work on a defined timeframe with a clear mandate, usually between 6-12 months for specific projects

D2.5. Through the standard development and revision process, the TC shall be responsible for:

- Providing technical expertise and industry insights
- Reviewing draft standards and related materials
- Developing recommendations for the Trust Protocol Board
- Evaluating implementation feasibility and impact
- Ensuring standards meet both sustainability goals and practical application

D2.6. The Trust Protocol secretariat shall support the TC by:

- Coordinating meetings and documentation
- Providing background research and analysis
- Facilitating stakeholder engagement
- Drafting standard documents based on TC input

- Supporting the evaluation of implementation feasibility

D2.7. The TC shall meet bi-monthly, with at least one in-person meeting during the standards development cycle. Additional input may be requested between meetings.

D2.8. Decisions by the TC shall be made by consensus whenever possible. If consensus cannot be reached after thorough discussion, a majority vote may be employed, with documentation of dissenting views.

D2.9. The TC may establish specialized working groups to address specific technical aspects of the standard when necessary.

D2.10. Participation in the TC by the appointed members shall be voluntary. In the event that any TC member drops out of the process, the Trust Protocol will determine whether or not the member should be replaced, depending on the stage of the process, the level of participation and expertise of the remaining members, and related considerations.

D2.11. Decisions by the TC may be made by consensus among members of the TC.

D2.12. In the event that consensus is not attempted/met, a majority vote shall be required within each stakeholder category as outlined in D2.2.

D2.13. When a vote occurs, a quorum of at least 75% of each stakeholder category as outlined in D2.2 shall be required.

D2.14. As the entity ultimately responsible for the standard, the Trust Protocol reserves the right to make final decisions regarding standard content and shall publicly disclose any decisions, including reasoning, that differs from the quorum of the TC.

Section E- Stakeholder identification

E1 The secretariat shall conduct stakeholder mapping to identify potential stakeholders and interested parties for outreach activities, including:

- Ensuring clear stakeholder participation goals are set and communicated for each stakeholder sector. Goals ensure representation from affected geographic regions and market sectors of the given standard
- Ensuring under-represented or disadvantaged stakeholders are identified in the stakeholder mapping with strategies to proactively seek their contribution

E2 The secretariat shall notify identified stakeholders of the development or revision and how they can participate in the development or revision.

E3 The secretariat shall make records of standard development or revision activities publicly available while the standard is still in development, with an open invitation to participate.

E4 Throughout the development or revision process, the secretariat shall actively seek feedback from the public at the following key stages of development:

- At the onset of a major revision to seek input on needed changes in the current version of the standard
- Following development/revision of the standard content, via a public consultation on the standard draft which is held for at least 15 days

- For a new standard, or if substantive, unresolved issues persist, via a second public consultation on the standard draft which is held for at least 30 days

E5 The secretariat shall conduct public consultations that include, at minimum, the following:

- A public announcement
- Targeted outreach to stakeholders identified during the stakeholder mapping
- A standard draft which is made publicly available
- A feedback mechanism
- A feedback summary that includes key topics of feedback and how they were addressed, shared publicly and directly with all participant.

Section F- Standard Setting Process

The standard setting process consists of **five key stages**: Preparation, Drafting, Consultation, Review and Approval, and Monitoring and Revision.

F1. Preparation

Objective: Define the scope, goals, and stakeholders for the new or updated standard.

F1.1 Establish a Standard Setting Committee (SSC) initially referred as U.S. Sustainability task force.

F1.1.1 Composition: Experts, producers, textile sector representatives, NGOs, government bodies, and other relevant stakeholders.

F1.1.1 Role: Oversee the development and review of the standard.

F1.2 Establish a Technical Committee (TC)

F1.2.1. See enumeration D2.2

F1.2.2. Role: See enumeration D2.5

F1.3 Define the purpose and scope of the standard.

F1.3.1 Identify the sustainability goals the standard will address.

F1.3.2 Decide whether the standard will cover the entire cotton production process or specific areas (e.g., plant protection products use, water management), and the value chain steps it will apply to (e.g., farm, gin, manufacturing).

F1.4 Collect baseline data and research.

F1.4.1 Analyze current sustainability practices in cotton farming.

F1.4.2 Review existing standards, reports, and guidelines relevant to cotton production (e.g., ICAC, Textile Exchange, peer reviewed LCA reports, national indicators reports).

F1.4.3 Identify local/regional conditions, challenges, and opportunities.

F1.4.4 Standards design shall take into consideration pre-existing standards that cover similar areas including an analysis of overlapping scopes and potential opportunities to strengthen alignment or complementarity.

F1.4.5 If operational standards with similar desired outcomes are found to be in place with other organizations, these organizations shall be informed about the new standard development and invited to provide input.

F2. Drafting

Objective: Develop the first draft of the standard based on identified goals and stakeholder inputs.

F2.1 Set clear, measurable criteria and indicators for sustainability aligned with the Trust Protocol's specific sustainability goals.

F2.1.1 Environmental:

- 13% increase in productivity (i.e., reduced land use per pound of fiber)
- 18% increase in irrigation efficiency
- 39% reduction in greenhouse gas emissions
- 15% reduction in energy expenditures
- 50% reduction in soil loss
- 30% increase in soil carbon

F2.1.2 Social: Labor rights, child labor, worker welfare, health and safety.

F2.1.3 Economic: Market access, financial viability of required practises, distribution of value to the producer.

F2.2 Develop specific guidelines, practices, and compliance requirements for each required or recommended criterion through the document Standard Guidelines.

F2.2.1 For example, specify how cotton farmers should reduce soil erosion or adopt water-saving irrigation techniques.

F2.3 Include mechanisms for monitoring and verification.

F2.3.1 Define how compliance will be measured through

- Producer self-assessment questionnaire covering nine principles/categories: soil health, nutrient management, water management, crop protection, chemical management, biodiversity, fiber quality & traceability, farm management and worker well-being
- Use of the FieldPrint Calculator or other qualified data providers to monitor farms for best management practices
- Independent third-party verification through Control Union Certifications, Averum and IDFL: Textile Testing & Quality Assurance to review and verify the data collected from the producer members
- Additional verification methods as appropriate (e.g., satellite monitoring)

F2.4. The following shall be noted in the Standard:

F2.4.1 The official language of the standard, which is English, and in the case of inconsistency between translated versions, the English version prevails.

F2.4.2. Anticipated timing of the next revision and how to submit feedback or complaints.

F2.4.3. Reference to the release date, effective date, and version number (a new standard will begin at version 1.0).

F2.4.4. A disclaimer stating that U.S. Cotton Trust Protocol will not be held liable for use of the standard; and

F2.4.5. A copyright statement.

F3. Consultation process

Objective: Gather feedback from a wide range of stakeholders to ensure the draft is comprehensive, practical, and aligned with global sustainability principles.

F3.1. Public consultation and stakeholder meetings.

F3.1.1. Hold workshops, webinars, or roundtables with cotton farmers, textile sector representatives, environmental NGOs, and policymakers.

F3.2. Collect feedback and suggestions for improvement.

F3.2.1. Encourage comments on the draft's feasibility, clarity, and alignment with sustainability goals.

F3.3. Revise the draft based on feedback.

F3.3.1. Address concerns related to feasibility, costs, and impacts on farmers or specific regions.

F4. Review and Approval

Objective: Finalize and approve the standard.

F4.1. Conduct a final review of the draft.

F4.1.1. Ensure the standard aligns with global sustainability frameworks, national laws, and local conditions.

F4.2. Submit the standard for approval by the governing body or regulatory agency (e.g., board of directors)

F4.3. Publish the approved standard.

F4.3.1. Provide accessible materials. At minimum, the following documents shall be available to participants:

- Final Standard
- Final Standard Guidelines
- Program manual and verification protocol
- Feedback summary available upon request
- Summary of key changes.
- Detailed list of all changes from previous versions, available upon request, if applicable
- Updated Claims Policy

F5. Monitoring and Revisions

F5.1. U.S. Cotton Trust Protocol standard shall undergo a major revision at least every five years.

F5.2. Minor revisions with non-substantive changes may be made by U.S Cotton Trust Protocol without consulting the standard setting committee or technical committee

F5.3. In addition to those scheduled, major revisions may also be initiated for the following reasons:

- Standard criteria result in critical unintended consequences that compromise the goals or desired outcomes of the standard.
- New developments that change or affect the implementation, assurance process, or known impacts of the standard.
- Expanded goals or scope in U.S. Cotton Trust Protocol strategy.
- At the discretion of U.S. Cotton Trust Protocol Board of Directors.

F5.4. All major revisions shall include the following:

- Update and approval of the project plan
- Approval of the public consultation standard draft
- Public consultation of at least 15 days; and
- Approval of the final standard.

Section G- Complaints and Appeals

G1 Stakeholders can lodge formal complaints or share feedback about the Trust Protocol's standards activities via the Trust Protocol Grievance process using grievance@trustuscotton.org available on the Trust Protocol website.

G2 The Trust Protocol Grievance Policy explains in detail how the Trust Protocol receives, manages, and addresses both complaints and general feedback relating to Trust Protocol standards, standards logos, and scheme participants.

Appendix: Definitions

1. **Consensus:** General agreement, characterized by the absence of sustained opposition to substantial issues by any important stakeholder group, achieved by a prespecified deadline.
2. **Interested party:** Any person or group concerned with or who may be directly affected by a standard.
3. **Minor Revision:** Changes to the standard that are non-substantive and do not require the full approvals by the SSC or TC or public consultations. Non-substantive changes to a standard include, but are not limited to, improving or clarifying language without changing the intent, correcting typing or grammatical errors, and updating references to other documents where these have changed.
4. **Major Revision:** Changes to the standard that are substantive and require the full revision process as identified in Section 5.5. Substantive changes include changing the intent and objectives of the standard or the criteria within. Major revisions may be scheduled or initiated when necessary.
5. **Project Plan:** A document that articulates what the standard aims to achieve and why the standard development, or revision of the standard, is needed. It includes a summary of key information to guide the process of standard development or revision:
 - Justification of the need for the new standard development or for a standard revision
 - Proposed scope, including geographic regions of significance
 - Clear goals and objectives for the standard, including intended sustainability outcomes
 - An assessment of risks in implementing the standard, and how to mitigate these
 - Identification of factors that could have a negative impact on the ability of the standard to achieve its objectives
 - Unintended consequences that could arise from its implementation
 - Possible corrective actions that could be taken to address these potential risks
6. **Public Consultation:** The process of gathering input and feedback from stakeholders on the standard draft held at the end of the development or revision process, open to any interested parties.
7. **Protocol Cotton:** Cotton produced on farms enrolled in the U.S. Cotton Trust Protocol.

8. **Secretariat:** The administrative role of the SSC or TC, which includes record keeping, stakeholder management, and other functions such as assurance management, and monitoring and evaluation.
9. **Standard:** Document that provides requirements, specifications, guidelines or characteristics that can be used consistently to ensure that materials, products, processes and services are fit for their purpose.
10. **Standard Setting Committee (SSC):** A balanced and diverse group of stakeholders, including those directly affected by implementation of the standard and/or those the standard seeks to positively impact, actively engaged in the development or revision of a standard.
11. **Technical Committee (TC):** Individuals and representatives of companies/organizations appointed by the Secretariat who have agreed to volunteer their time on project specific activities.

Relationship between the standard setting and technical committees:

| Aspect | Standard Setting Committee (SSC) | Technical Committee (TC) |
|-------------------|---|--|
| Nature | Permanent governance body | Temporary project-specific body |
| Focus | Process integrity and oversight | Subject matter expertise and stakeholder input |
| Composition | Trust Protocol leadership, US cotton industry experts and relevant stakeholders | Balanced stakeholder representation |
| Authority | Approves project plans and committee formation | Makes recommendations to SSC and Board |
| Meeting Frequency | On a need basis | Bi-monthly or as needed for project timeline |
| Term | Ongoing | Limited to project duration |

12. **Trust Protocol Consumption Management Solution (PCMS):** The digital system used to record consumption of U.S. Cotton and/or Protocol Cotton within all stages of manufacturing, creating a digital chain of custody that provides brands and retailers with visibility into where their products are made.

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The Trust Protocol contributes to the UN Sustainable Development Goals, is recognized by Textile Exchange and Forum for the Future, and is part of the Sustainable Apparel Coalition, Cotton 2025 Sustainable Cotton Challenge, Cotton 2040, and Cotton Up initiatives. It has also been recognized and published in the ITC Standards Map.

Disclaimer

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Document Revision

The Standard Setting Procedure V1.0 will undergo a revision process at least every five years. The next revision is tentatively scheduled to begin in 2030, for completion in 2031. You may submit feedback to the standard at any time via the U.S. Cotton Trust Protocol website. Points of clarification may be incorporated into supplementary and guidance documents prior to 2030. More substantive feedback or suggested changes will be collected and reviewed as part of the next revision of the document.