



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

**U.S. COTTON TRUST PROTOCOL
STAKEHOLDER ENGAGEMENT**

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Section A- Introduction

This document was prepared in support of the Trust Protocol’s application to become an ISEAL Community Member and moved towards compliance with the ISEAL Code of Good Practice. It summarizes the ongoing monitoring, stakeholder consultation, and review of the U.S. Cotton Trust Protocol’s initiatives and normative documents, to ensure they remain relevant and accessible to its stakeholders and align with the goals to improve the impact of U.S.-grown cotton on people and the planet. The Trust Protocol was launched in July 2020 and its approach to governance is evolving with scale and maturity, along with guidance from its multi-stakeholder board. Following the second annual progress report in November 2022 and the validation of results from the field, an annual cycle of program review and stakeholder engagement was established.

Section B- Stakeholder Involvement

The Trust Protocol is governed by a multi-stakeholder board of directors including producers, brands/retailers, conservation and wildlife civil societies, 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 on cotton industry efforts to promote producer economic livelihood, environmental stewardship, caring of people and community and personal and corporate integrity.

In developing the Trust Protocol, leaders from U.S. cotton industry organizations including the National Cotton Council, Cotton Board, Cotton Council International, and Cotton Incorporated engaged ten technical experts in cotton biology and production to discuss how future technologies would impact trends in fourteen key performance indicators, which are used to assess the sustainability of cotton production systems. As a result, recommendations for six

science-based U.S. cotton industry goals were presented in 2017 to the newly formed Cotton USA Sustainability Task Force. A seventh goal, enrolling 2.5 million acres into Field to Market's Fieldprint Calculator, was also set-the Fieldprint Calculator is the tool that will measure continuous improvement and environmental metrics. The recommendations of the expert group included goals for the next five,10 and 30 years.

The Trust Protocol was formed by the Cotton USA Sustainability Task Force as a program to enable the industry to reach goals while emphasizing the importance of continuous improvement. Following the launch of the Trust Protocol and the formation of governance statutes in 2020, the program sets out to maintain stakeholder engagement and consultation as a routine and integrated discipline in the ongoing evolution of the program and will communicate regularly about opportunities for stakeholder involvement.

Section C- Monitoring of Program Activities

The Trust Protocol's activities are continuously monitored by assessing progress towards the following aims:

- **Relevance to growers** – In addition to direct dialogue with growers and their representatives on the Trust Protocol board, second and third-party assurance verifications provide a direct source of feedback on the applicability of the program at the farm level. For example, the difference between declared and actual (verified) practices on the farm will indicate any need to review the question set and data-gathering methodology.
- **Relevance to the textile industry** – in addition to representation on the Trust Protocol board, frequent and wide-ranging engagement is maintained throughout the Protocol year with members and prospective members from all stages of the textile value chain. Direct feedback from industry members is received through individual meetings, trade events, surveys, and wider observation of industry needs and trends.
- **Strategic partnerships** bring specialist expertise and capability to the program, providing insight that enhances the Trust Protocol's ability to maintain relevance to the groups it serves, and adopting established best practices:
 - [The Alliance for Sustainable Agriculture](#) is a diverse collaboration working to create opportunities across the agricultural supply chain for continuous improvements in productivity, environmental quality, and human well-being. By uniting the agricultural supply chain and key stakeholders around a common measurement framework, Field to Market seeks to drive continuous improvement in the sustainability of commodity crop production. By partnering with Field to Market on agricultural metrics, U.S. Cotton Trust Protocol can be confident of remaining on the leading edge of scientific developments in field level environmental impact measurement.
 - Authorized verification bodies: [Control Union](#), Averum and, IDFL provide supply chain assurance programs across a wide range of agricultural commodities in diverse geographies, and throughout the textile value chain. In addition to designing and delivering the Trust Protocol on-farm verification, Control Union provides expert guidance on assurance throughout the program, ensuring consistent and robust

monitoring. Refer to the Trust Protocol Program Manual & Control Union Verification Protocol documents for detail.

- Technology partners: [Textile Genesis](#) is a technology provider of a solution that provides unparalleled supply chain transparency specifically for the textile and apparel industry. With agreements in place with several sustainable fiber and certification sources, including Textile Exchange, Lenzing Fibers, Recycled Polyester, Responsible Wool, recycled cotton and the U.S. Cotton Trust Protocol, Textile Genesis is creating a central hub for sustainable fiber supply chain transparency – enabling Trust Protocol to integrate with and advance in supply chain transparency.

Section D- Strategy: Stakeholder Review

Trust Protocol strategy and operational efficacy is regularly reviewed by its multi-stakeholder board and expert advisors. The following enables a continuous source of feedback and review from a broad range of stakeholder groups, such that the Trust Protocol can ensure its relevance:

- Direct stakeholder dialogue
 - Trust Protocol Board – see ‘Trust Protocol Structure of Governance’ for detail. Board meetings are held quarterly to ensure regular and open dialogue. Care has been taken to involve stakeholders representing the entire value chain at board level, ensuring healthy challenge to the continuous improvement of the program, and closely involving organisations with shared interest, for example the World Wildlife Fund
 - External committees – Trust Protocol representatives are cross populating knowledge and best practise in a number of fora, ensuring participation and learning wherever cotton sustainability is being discussed at expert level. Including but not limited to; Cascale, Textile Exchange, Cotton 2040, ICAC delta Project, Soil Health Institute.
 - Textile sector sustainability conferences & trade events are attended by Trust Protocol representatives to ensure a two way dialogue with relevant organisations around the world and at each step of the value chain. Including but not limited to; Innovation Forum, Bremen World Cotton Conference, Better Cotton, Textile Exchange Conference.
 - Cotton Council International hosts regular events in growing and manufacturing regions to meet with users of the Trust Protocol and build relationships in the value chain from farm to store (Cotton Days, Farm Tours, Cotton Sourcing fairs).
- Alignment to global goals and initiatives – Trust Protocol has been designed with global goals in mind, and regularly reviews this landscape to ensure contemporary relevance. Including but not limited to; Paris Climate Change Agreement, UN Climate Change Charter for fashion, G7 Fashion pact, Textile Exchange Sustainable Cotton Commitment, German and Dutch Sustainable Textile Alliance.
- Inspection and benchmarking to other programmes by third party initiatives such as the German Textile partnership (ITC platform), and the Textile Exchange Preferred Fibres and Materials Matrix brings external validation of the programme.
- Evolving policy and regulation is closely monitored and supported by direct dialogue with leading policy makers. Including but not limited to; EU Commission and the development of the Textile Strategy roadmap, U.S. Customs and Border Protection in relation to forced labor in supply chains.

- Indirect stakeholder research is commissioned to gather insights and opinions from key groups the Trust Protocol may not have a relationship with – for example textile industry research through Cotton Council funded surveys (e.g., Sourcing Journal) or citizen insight through consumer surveys.

Section E- Stakeholder Management Process

The Trust Protocol engages stakeholders in critical areas within the program, including normative documents guiding the verification program, and program development and innovation initiatives to scale our work. Examples of these areas include:

- The Claims Framework
- Material changes to user systems (e.g. Protocol Consumption Management Solution and others)
- Assurance system and model
- Member participation rules, contracts, and fee structures

The Trust Protocol stakeholder management process involves a five-step engagement policy:

Step 1: Define the policy

Before involving the stakeholders, the Trust Protocol defines and articulates the scope of the work through PowerPoint presentations, collaborative spreadsheets, or pdf files. Trust Protocol clearly defines the assumption of change background and impact to set the policy's scene.

Step 2: Identify stakeholders

Identifying stakeholders is a critical process that helps to manage and engage different stakeholder groups. The Trust Protocol identifies key stakeholders by gathering and assessing information on both internal and external stakeholders. Internal stakeholders include employees, the board of directors, leadership and management teams, and independent consultants, while external stakeholders include Trust Protocol members, brands, mills, manufacturers, growers/producers, collaborative partners, external consultants, and end-users.

Step 3: Develop an engagement plan

Trust Protocol ensures levels of engagement with stakeholders by:

1. Informing the stakeholders of the work, including strategies, core assumptions for change and improving outcomes. Either the information is actively broadcasted to stakeholders, or the information is made available, and it's on stakeholders to find it.
2. Consulting the stakeholders to provide feedback on the assumption for change that can improve the outcome. The consulting process is more about giving a response when only asked a question.
3. Involving the stakeholders in identifying the assumptions for change. The stakeholders are involved early in providing various alternative strategies to management and decision-makers.

4. Collaborating with the stakeholders to identify and develop assumptions for change through engagement with Trust Protocol leadership and management. Stakeholders primarily have a voice in decision-making through public consultations, and may also participate, where appropriate, in board meetings, and committees as stakeholder group representatives or external experts.
5. Co-creating with the stakeholders to improve the outcomes by engaging them throughout the process. Co-creating activity may include decision-making strategies or operational execution of the decisions through specific action.

The Trust Protocol facilitates all engagement activities through in-person or online meetings, phone calls, conferences, collaborative forms, spreadsheets, press events, letters, newsletters, websites, and advertising.

Step 4: Define the governance process

Trust Protocol defines the governance process for the stakeholder management process by outlining roles, responsibilities, and relationships among the stakeholders and also ensuring issue management and resolution with information dissemination and transparent communication.

Stakeholder engagement processes for the development of the standard is outlined in the **Standard-Setting Procedure**.

The Trust Protocol routinely maintains the stakeholder map to ensure stakeholder consultation into regular governance routine and operations. The engagement planning is reviewed at monthly senior staff sessions with board oversight every quarter of the annual year.

Step 5: Provide feedback and generate reports

The Trust Protocol incorporates feedback with reports reflecting stakeholder inputs. Reports are documented in written form and shared via web meetings, phone calls, or e-mails to facilitate distribution and transparency.

Section F- Stakeholder Engagement Approach

The Trust Protocol approach to stakeholder engagement uses the stakeholder power vs interest grid analysis technique.

- 1) **High power- High-interest group:** These stakeholders have high authority and high interest, making them likely to be decision-makers and have the most influence on the project's success. The Trust Protocol will manage their expectations by staying in regular contact with these stakeholders.
- 2) **High power- Low-interest group:** These stakeholders, who possess high influence but low interest, must be kept informed about the project's progress. Even though they may not be interested in the outcome, they yield power. The Trust Protocol will deal with this group of stakeholders with caution since if they are not satisfied, they may use their influence negatively.
- 3) **Low power- High-interest group:** The Trust Protocol will keep these individuals well-informed and communicate with them to ensure that no significant concerns are developing as this group of stakeholders are often very helpful with specific details.

- 4) **Low power-Low-interest group:** The Trust Protocol will closely monitor this group of stakeholders but won't indulge in excessive communication

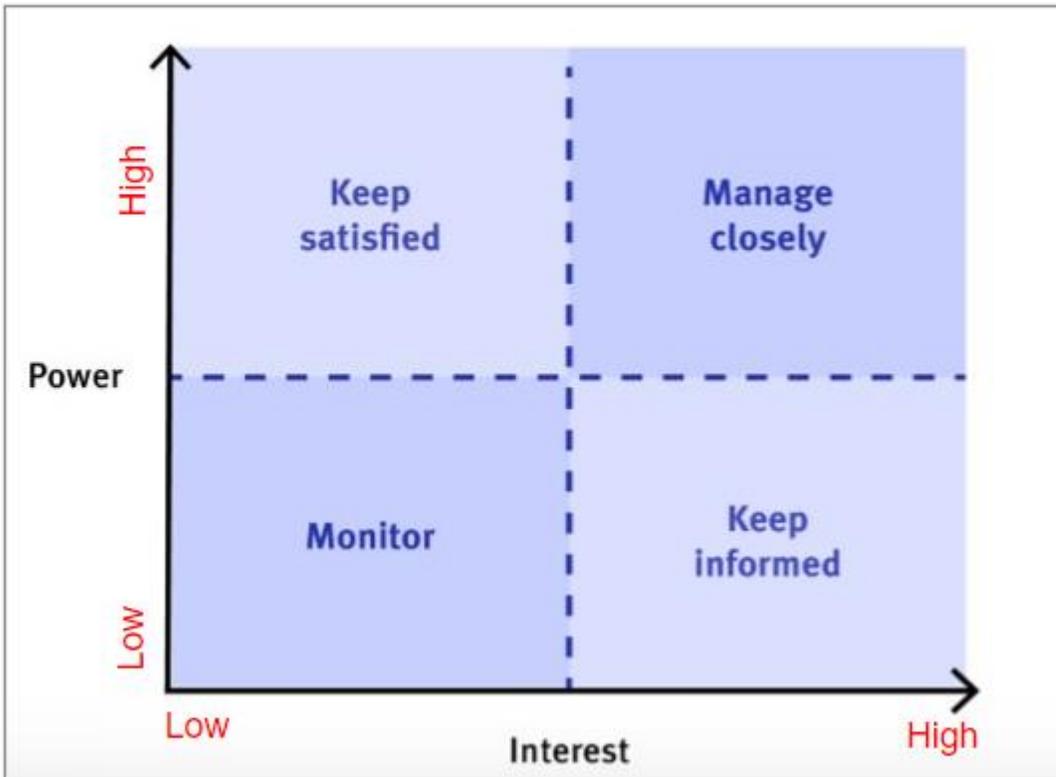


Figure 1: Stakeholder power vs interest grid

Section G- Trust Protocol Key Stakeholder Groups



Figure 2: Key stakeholder groups for U.S. Cotton Trust Protocol

Section H- Directory of Key Stakeholders

The Trust Protocol is affiliated with the following organizations and initiatives:

Organization Name	Type of organization	Website	Relationship/Relationship to Trust Protocol
Textile Exchange – matrix of preferred fibers and materials	A global non-profit which develops, manages, and promotes a suite of leading industry standards, as well as collects and publishes critical industry data and insights.	https://textileexchange.org/ https://textileexchange.org/2025-sustainable-cotton-challenge	The Trust Protocol is one of 36 fibers and materials that over 170 participating brands and retailers can select from as part of Textile Exchange’s Material Change Index program. The Trust Protocol joins the Better Cotton Initiative (BCI), Cotton

			Made in Africa (CmiA), Fairtrade Cotton, Organic Cotton and Recycled Cotton as a preferred cotton fiber. The Trust Protocol is also recognized as part of Textile Exchange's 2025 Sustainable Cotton Challenge
ITC Standards Map	The world's largest database for sustainability standards.	https://www.standardsmap.org/en/home	The Trust Protocol is recognized and published in the standard mapping process by the International Trade Centre, giving brands and retailers around the world greater choice when it comes to sourcing sustainably grown cotton
Forum for the Future: Cotton 2040	Sustainability Non-Profit	https://www.forumforthefuture.org/ https://www.forumforthefuture.org/cotton-2040 http://cottonupguide.org/sourcing-options/sourcing-options-sustainability-considerations/	The Trust Protocol is acknowledged by Forum for the Future and participates in their Cotton 2040 coalition. Additionally, the Trust Protocol is part of their CottonUP initiative as a recognized sourcing option for cotton
Cascale	Alliance for sustainable production in the apparel, footwear and textile industries	https://apparelcoalition.org/	The Trust Protocol is a member of Cascale, joining over 250 global organizations from multiple sectors who have committed to furthering sustainability and transparency throughout value chain. Cascale provide the secretariat for

			<p>the development of the EU PEF (product footprinting rules). Trust Protocol participates in the Member Expert Team for HIGG Cotton metrics. The Policy Hub is affiliated to Cascale, a source of regulatory insight and consultation.</p>
HIGG	<p>Commercial partner of Cascale, providing the platform and tools used by its members.</p>	<p>https://higg.com/</p>	<p>Trust Protocol environmental metrics provided to SAC will appear in the HIGG product tools used by brands and other value chain members, under the materials sustainability index (MSI)</p>
ISEAL	<p>ISEAL is a global membership organization that supports credible sustainability systems in their work, with the goal to drive greater impact and establish markets that are a force for good. The organization focuses on a wide variety of global challenges such as the climate emergency, biodiversity crisis and human rights issues among others.</p>	<p>https://www.isealalliance.org/</p>	<p>The Trust Protocol was accepted as an ISEAL Community Member in 2022 following a rigorous and meticulous approval process. ISEAL Community Members must be committed to continually improving their systems through learning and innovation, with emphasis on the importance of collaboration.</p>

<p>Partnership for Sustainable Textiles</p>	<p>The Partnership for Sustainable Textiles is a multi-stakeholder initiative with about 135 members from business, government, civil society, unions, and standards organisations. Together, they strive to improve the conditions within global textile supply networks — from production of raw materials to re-use and disposal.</p>	<p>https://www.textilbuendnis.com/en/</p>	<p>The Trust Protocol is a standard for sustainable cotton by Siegelklarheit, an initiative of the German Federal Government. By helping consumers to better understand environmental and social labels, Siegelklarheit wants to contribute to more sustainable purchasing decisions. U.S. Cotton Trust Protocol successfully passed Siegelklarheit’s assessment system. As a result, members of the Partnership for Sustainable Textiles (PST) can use the Trust Protocol as another standard to calculate their share of sustainable cotton.</p>
<p>Soil Health Institute (SHI)</p>	<p>The Soil Health Institute is a global non-profit with a mission of safeguarding and enhancing the vitality and productivity of soils through scientific research and advancement. Established the U.S. Regenerative Cotton Fund which encourages the adoption of soil health management systems across more than 1 million acres of U.S. cotton cropland.</p>	<p>https://soilhealthinstitute.org/about-us/</p> <p>https://soilhealthinstitute.org/our-work/initiatives/us-regenerative-cotton-fund/#our-goal</p>	<p>SHI sees opportunities that would allow cotton growers to measure and report their soil health improvements in the U.S. Cotton Trust Protocol. Consequently, SHI is committed to working synergistically with the U.S. Cotton Trust Protocol to bring those benefits to growers and the U.S. cotton industry.</p>

Cotton UP guide	Hosted By Textile Exchange, a practical guide to sourcing more sustainable cotton. The CottonUP guide exists to help apparel industry professionals develop and implement sourcing strategies	http://cottonupguide.org/	Trust Protocol is listed in the guide as a sustainable cotton standard.
SWOF (Soil and Water Outcomes Fund)	Market-based solution to soil and water stewardship.	https://www.theoutcomesfund.com/	Works to compensate farmers and ranchers who improve the environment through their agricultural practices. Market program reduces greenhouse gases, improves water quality, and increases other ecosystem services to benefit society. Extensive membership including: WWF, American Farmland Trust, Soil Health Institute, Nestle, Regrow and USDA

**Other partners/
stakeholders**

Control Union	Certification provider for the sustainability of the industry's supply chains which feed into the food, feed, forestry, biomass, bioenergy, social compliance and textiles markets	https://certification.controlunion.com/en	Control Union are third party assurance provider verifying Trust Protocol grower practices.
Nature Conservancy	The Nature Conservancy is a global environmental organization,	https://www.nature.org/en-us/	Dr. Kris Johnson, Deputy Director of Agriculture at The Nature Conservancy, currently sits on the Trust

	headquartered in Arlington, Virginia.		Protocol Board of Directors.
Field to Market	Field to Market: The Alliance for Sustainable Agriculture brings together a diverse group of grower organizations, agribusinesses, food, beverage, apparel, restaurant and retail companies, conservation groups, universities, and public sector partners to define, measure and advance the sustainability of food, feed, fiber and fuel production in the United States.	https://fieldtomarket.org/the-alliance/	Trust Protocol formed a partnership in 2020, which seeks to strengthen the ability of cotton growers and the value chain to drive continuous improvement, combining two of the industry's leading sustainability assessment frameworks.
Textile Genesis	Textile Genesis is a pioneering traceability platform custom built for the fashion & textile ecosystem	https://textilegenesis.com/	Trust Protocol joined the TextileGenesis platform in 2021 as the world's first sustainable cotton fiber to offer full transparency across the supply chain on the platform.
The Seam	The Seam is a leading provider of trading and technology solutions enabling agribusinesses to operate profitably and efficiently throughout a sustainable global supply chain.	https://www.theseam.com/	The Seam developed the existing Trust Protocol Platform in 2020, allowing U.S. cotton farmers to assess and verify production practices, environmental footprint and measurement of progress toward long-term sustainability goals.

Cotton Incorporated	Not-for-profit company providing the resources and research needed to help companies develop and market superior, innovative, and profitable cotton products.	https://www.cottoninc.com/	
Cotton Council International	A non-profit trade association that promotes U.S. cotton fiber and manufactured cotton products around the globe with our COTTON USA trademark.	https://cottonusa.org/cotton-council-international	
National Cotton Council	The National Cotton Council of America is the central organization for the U.S. Cotton industry - mission is to ensure the ability of all U.S. cotton industry segments to compete effectively and profitably in the raw cotton, oilseed and U.S.-manufactured product markets at home and abroad.	https://www.cotton.org/index.cfm	
Supima	Supima is a non-profit trade association in the United States whose main objective is to promote the use of U.S. grown American Pima cotton around the world and is involved in quality assurance and research programs.	https://supima.com/	

USDA	The United States Department of Agriculture (USDA) is the federal executive department responsible for developing and executing federal laws related to farming, forestry, rural economic development, and food.	https://www.usda.gov/	USDA database is used to verify/ authenticate the U.S. cotton's origin. As the fiber is ginned, each bale's unique PBI and gin weight are recorded and verified against the USDA master list for authenticity and duplication.
WWF	WWF is the world's leading independent conservation organization.	https://www.wwf.org.uk/	Melissa Ho, Senior VP of WWF, previously held a position on the Trust Protocol Board of Directors.
John Deere - data partnership	An American corporation that offers technology, best-in-class equipment, and data tools to cotton growers	https://www.deere.com/en/	Deere enables the Trust Protocol to leverage data to access additional value associated with sustainable practices and sustainable crops.
International Cotton Association (ICA)	A UK-headquartered trade association, which provides ICA Bylaws & Rules that govern the trading of cotton. The ICA now has more than 550 members and operates on a not-for-profit basis. The ICA also offers a range of services – arbitration, training, trade and networking events, plus cotton testing and research via ICA Bremen.	https://ica-ltd.org/	In February 2022 the Trust Protocol signed a Memorandum of Understanding with the ICA for closer cooperation as part of a series of alliances that the ICA has formed with similar groups.

Section I- Initiative alignment and industry stakeholder frameworks

Organization Name	Type of organization	Website	Relationship/Relevance to Trust Protocol
U.N. Sustainable Development Goals	IGO/ internationally recognized sustainability goals	https://sdgs.un.org/goals	Goals - The U.S. Cotton Trust Protocol is aligned with the relevant UN Sustainable Development Goals
G7 Fashion Pact	The Fashion Pact is a global coalition of companies in the fashion and textile industry	https://www.thefashionpact.org/?lang=en	Pledge - The Trust Protocol is aligned with the G7 Fashion Pact which requires they follow their common core of environmental goals in three areas: stopping global warming, restoring biodiversity and protecting the oceans.
UNFCCC Fashion Industry Charter	IGO/ charter which contains the vision to achieve net-zero emissions by 2050 in the fashion industry	https://unfccc.int/climate-action/sectoral-engagement/global-climate-action-in-fashion/about-the-fashion-industry-charter-for-climate-action	Pledge – The Trust Protocol is aligned with the Charter, which contains the vision to achieve net-zero emissions by 2050. It was launched at COP24 in 2018 and renewed at COP26 in 2021.
Greenhouse Gas Protocol	A global framework to measure and manage greenhouse gas emissions from private and public sector operations, value chains and mitigation actions.	https://ghgprotocol.org/	Pledge - The Trust Protocol is aligned with the Greenhouse Gas Protocol's aim to reduce emissions. The Greenhouse Gas Protocol system has designed to be neutral and sector agnostic - allowing the Trust Protocol to tailor it to their specific needs and requirements.

<p>Science Based Targets initiative (SBTi)</p>	<p>SBTi is a partnership between the CDP, United Nations Global Compact, World Resources Institute and World Wide Fund for Nature.</p>	<p>https://sciencebasedtargets.org/sectors/forest-land-and-agriculture</p>	<p>Pledge - With nearly a quarter of global GHG emissions coming from agriculture, forestry and land use, SBTi has developed guidance for those in land-intensive sectors to set science-based targets.</p>
<p>Soil Carbon Initiative</p>	<p>A commitment and verification program that empowers and incentivizes farmers.</p>	<p>https://www.soilcarboninitiative.org/</p>	<p>Pledge - SCI is focused on helping farmers improve soil health, carbon drawdown, biodiversity, water quality, climate resilience, and good security.</p>
<p>America Farmland Trust</p>	<p>Founded in 1980 is a national agricultural organization</p>	<p>https://farmland.org/</p>	<p>Pledge - The AFT is aligned with the Trust Protocol on the importance of water usage for sustainable farming</p>
<p>Farmers for a Sustainable Future</p>	<p>An organized body of farmers and ranchers in the US.</p>	<p>https://www.fb.org/land/fsf</p>	<p>Pledge - Farmers for a Sustainable Future are aligned with the Trust Protocol's goals of promoting soil health, biodiversity and conserving water.</p>