



Verification Procedures: The U.S. Cotton Trust Protocol

Version 3.0 - February 2025

Contents

Section A- General Information	3
A1. The U.S. Cotton Trust Protocol	3
A2. Objective of the Program	3
A3. Guiding Principles	4
A4. About the Verification Procedures	4
A4.1 Introduction and scope.....	4
A4.2 Changes in the Verification Procedures (v2.0 to V3.0).....	5
Section B- Terms and Definitions.....	6
Section C- Prerequisites for Conducting Verification Assessments	6
C1. Confirmation of Grower Requirements	6
C2. Assignment of Farm Verification Groups.....	7
C2.1 Selection of Farm Verification Groups.....	7
C2.2 Farm Group Management System (FGMS).....	8
Section D- Verification Assessment Process	9
D1. Second-Party Verification Assessment.....	9
D2. Data for Verification Assessment: Self-Assessment Questionnaire	10
D3. Third-Party Verification Assessments.....	11
D3.1 Overview: Third-Party Verification Assessment Stages.....	11
D3.2 Third-Party Verification Assessment Process	12
D3.3 Stage 1: Farm Group Management System Verification	14
D3.4 Stage 2: Farm Level Verification	14
Section E- Risk Assessment and Sampling of Farm Verification Groups.....	16
E1. Identifying the Risk Level for the Farm Verification Group	16
E2. Sampling for Third-Party Verification Assessments	16
Section F- Evaluation of Compliance	17
F1. Identification of Non-compliances, Deviations, and Variations.....	17
F1.1 Self-Assessment Questionnaire Evaluation.....	17
F1.2 Fieldprint Calculator Evaluation	18
F2. Scoring Methodology	19
F3. Corrective Action Plans	20
F4. Reporting of Verification Results	21
F5. Reverification	21

Section A- General Information

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.

A4. About the Verification Procedures

A4.1 Introduction and scope

A4.1.1 The U.S. Cotton Trust Protocol's Verification Procedures define the processes for verification bodies to conduct verifications against the Trust Protocol's Principles and Criteria.

A4.1.2 The procedures guide verification bodies and verifiers to understand what needs to be in place before a verification takes place, the rules surrounding the verification, and how to accurately assess compliance levels in the field. This document supports verification consistency and quality among verification bodies and verifiers.

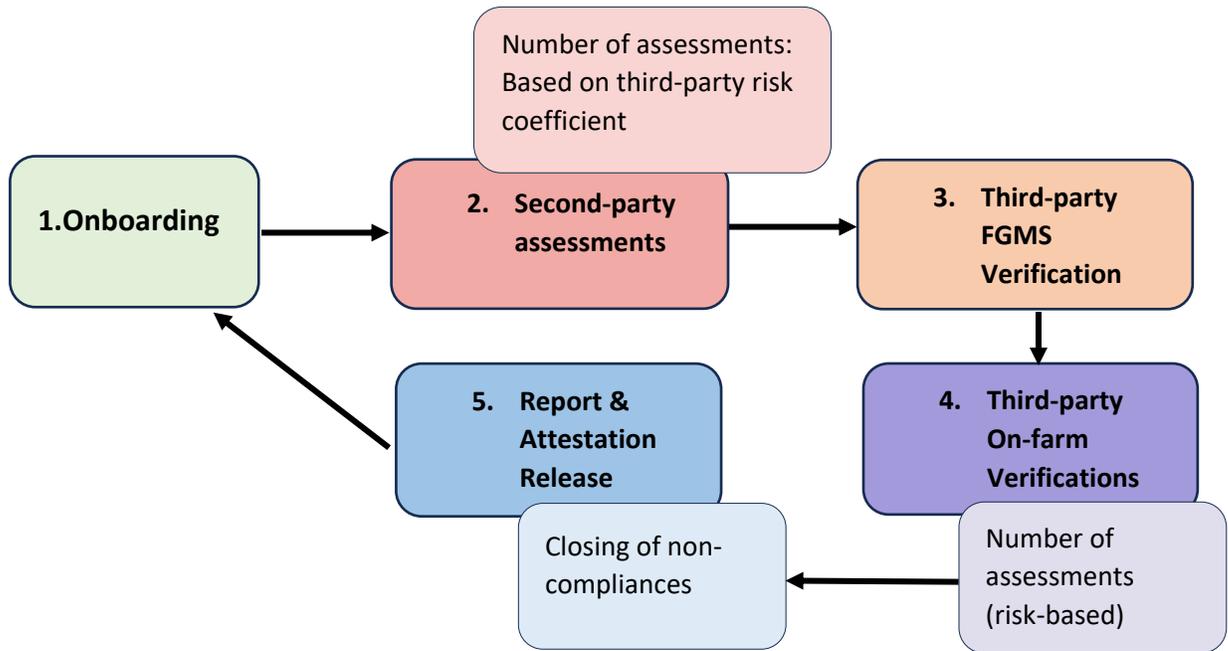
A4.1.3 The Verification Procedures were developed as a supporting document to the **Verification Program Manual**, where grower and verification body requirements are defined for conducting second and third-party verification assessments against the Trust Protocol's Principles and Criteria.

A4.1.4 Adherence to these procedures is monitored by the Trust Protocol as part of scheme owner oversight to assess verification body performance.

A4.1.5 These procedures were written to align with the [ISEAL Code of Good Practice v1.0](#). The procedures are developed and revised by the Trust Protocol in consultation with assurance program stakeholders including verification bodies and the Trust Protocol board.

A4.1.6 The Trust Protocol welcomes input on these requirements at any time and these can be e-mailed to integrity@trustuscotton.org. There will be a consultation period with stakeholders during each revision cycle for these procedures. Clarification of requirements may be incorporated into supplementary and guidance documents prior to the next revision.

A4.1.7 The verification process steps are summarized in the diagram below:



A4.2 Changes in the Verification Procedures (v2.0 to V3.0)

Change	V 2.0	V 3.0
Document format: Document section lettering and requirements enumeration	Requirements were listed in narrative form	Sections and requirements are enumerated to facilitate identification and cross-reference with other assurance documents
Added reference to a Terms and Definitions document	Some definitions of program terms were included at the beginning of the manual	A standalone document, U.S. Cotton Trust Protocol Terms and Definitions , was developed and will be updated periodically to reflect all program definitions and any required updates.
Grouping of requirements within the document	Some requirements for multiple stakeholders were grouped into the same paragraphs or sections.	Grouping of requirements and re-naming of some sections for clarity
Farm Group Management System internal procedures	Trust Protocol internal procedures included in this document	Internal procedures relating to the Farm Group Management System were removed and will be

		added to the Trust Protocol’s internal procedures to support program improvements
--	--	---

Section B- Terms and Definitions

Refer to **U.S Cotton Trust Protocol Terms and Definitions** for the definition of terms used in this document. 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.

The following terms are used as guidance to interpret these requirements:

- a. “shall” indicates a requirement,
- b. “should” indicates a recommendation,
- c. “may” indicates a permission, and
- d. “can” indicates a possibility or capability

Section C- Prerequisites for Conducting Verification Assessments

C1. Confirmation of Grower Requirements

C1.1 The *Authorized Verification Body* shall comply with the requirements of Sections E1 and E2 of the **Program Manual** in order to become authorized to conduct verification assessments for the Trust Protocol.

C1.2 The Authorized Verification Body shall review the requirements for *growers* to participate in the program which are outlined in Section C of the **Program Manual**. Key elements of grower participation include use of these tools:

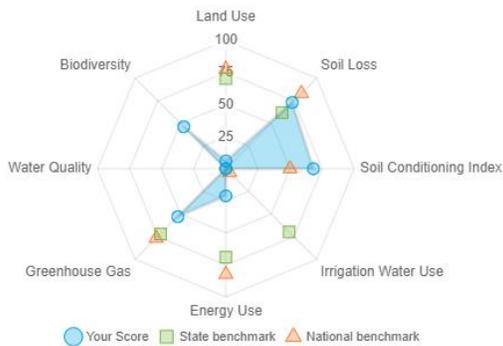
- a. Self-Assessment Questionnaire

The *Self-Assessment Questionnaire* outlines best management practices identified by the Trust Protocol with particular emphasis on cotton cultivation in the United States. The questionnaire is to be completed by each grower participating in the program and will be region-specific. The questionnaire can be accessed via the online *Protocol Platform*, and the grower can complete it with the help of a second party, if necessary. The questionnaire covers soil health, nutrient management, water management, crop protection, chemical management, biodiversity, fiber quality, farm management, and worker well-being.

- b. Fieldprint Calculator

The Trust Protocol works with Field to Market to engage growers in sustainability practices and data collection. In their own words, “Field to Market: The Alliance for Sustainable

Agriculture tackles the most urgent challenges facing our industry by forging pre-competitive collaboration and translating science into action. We bring together over 190 member organizations across the food and agriculture value chain to create a future in which farmers, business and nature thrive.” A key component of the Field to Market platform is a *Fieldprint Calculator*, whereby growers input information from a minimum of 10% of their planted cotton acres for the given crop year, and the calculator uses the information to provide a score on various environmental metrics (example presented below). The results on the individual grower level are compared to regional averages, which help the grower understand where they stand in relation to other growers in their region.



- c. Farmer Commitment Statement: All farmers participating in the Trust Protocol shall sign a Statement of Commitment, indicating their commitment to health, safety and environmental awareness. This statement will be accessible through the U.S. Cotton Trust Protocol’s online platform.

C1.3 The Authorized Verification Body shall confirm that the *Farm Verification Group* for each grower is assigned by the Trust Protocol based on the location of the growers’ operations or their *originating aggregators* (see Section C2).

C1.4 The Trust Protocol shall assign a risk score to each Farm Verification Group before the third-party verification assessment takes place. This risk score informs the number of growers chosen for *second-party verification assessment* by the Trust Protocol team the following year.

C2. Assignment of Farm Verification Groups

C2.1 Selection of Farm Verification Groups

C2.1.1 U.S. cotton growers that complete enrollment are grouped by the Trust Protocol into a Farm Verification Group according to their United States cotton-growing regions or the producer’s originating aggregator(s). The grouping of growers supports consistency in the assurance process and delivery of technical resources to grower groups.

C2.1.2 Growers are placed into groups based on regional boundaries for cotton production conditions and to support efficiency in organizing verification assessments. The Trust Protocol will communicate to the verification body the list of growers selected for verification assessments.

Growers are automatically classified into a Farm Verification Group, based on the state where they are cultivating cotton.			
Farm Verification Groups:			
West (United States)	Southwest	Midsouth	Southeast
Arizona California New Mexico	Kansas Oklahoma Texas	Arkansas Louisiana Mississippi Missouri Tennessee	Alabama Georgia Florida North Carolina South Carolina Virginia

C2.1.3 Every grower in the Farm Verification Group (not only those selected for verification assessments) shall complete the requirements as outlined in Section C of the **Program Manual**.

C2.1.4 If the verification assessment is completed successfully, then all production volumes coming from the growers in the Farm Verification Group can be designated as eligible cotton that can be used by Trust Protocol members for trade and processing according to the requirements outlined in the Trust Protocol **Chain of Custody Requirements**.

C2.1.5 There is no minimum or maximum size of a Farm Verification Group.

C2.2 Farm Group Management System (FGMS)

The *Farm Group Management System* (FGMS) is the system used by the Trust Protocol to track the progress of the individual growers within each group, in relation to the use of the Protocol Platform, required documentation, and any trainings.

C2.2.1 Each grower within a Farm Verification Group shall adhere independently to program requirements.

C2.2.2 The data entered by the grower in the Protocol Platform is managed at a Farm Verification Group level by the Trust Protocol, and the *Farmer Group Coordinator*. The Farmer Group Coordinator can be the program manager of the Trust Protocol, who is working with growers to support their engagement in the program, or an aggregator.

C2.2.3 The group implementation and management model follows a systematic approach, ensuring that all growers provide complete data and information for required documentation and have the necessary support and information regarding the objectives and operations of the program.

C2.2.4 Cotton production volumes shall be counted at the level of the individual grower as well as at the level of the Farm Verification Group.

C2.2.5 The Trust Protocol shall maintain records of the FGMS regarding the following topics:

- a. Required documentation from all growers:

- i. The Self-Assessment Questionnaire
- ii. Confirmation of completion of the Fieldprint Calculator
- iii. Farmer Commitment Statement
- b. Education and training of growers in a group:
 - i. Training about the Trust Protocol and the role of growers in the program
 - ii. The platforms used by growers to provide farm data and information
 - iii. Use of the data entered into the Protocol Platform and Fieldprint Calculator
 - iv. Overall operation of the program (enrollment, third-party verifications, assessment process, and reporting, etc.)

Section D- Verification Assessment Process

The verification assessment process follows the steps below:



D1. Second-Party Verification Assessment

D1.1.1 Second-party verification assessments¹ should be conducted annually based on a sample consisting of the square root of the number of growers within each Farmer group, multiplied by the coefficient of risk determined by the previous third-party verification assessment (see Section E1).

Coefficient of risk (previous 3rd party verification assessment):

LOW RISK= Square root of Farmer group * .5

MEDIUM RISK= Square root of Farmer group * .75

HIGH RISK= Square root of Farmer group

¹ Second- and third-party verification assessment methodologies were adapted in 2022 to make the third-party verification assessment process more rigorous by expanding the sample size, and to make second-party verification assessments more targeted and effective by prioritizing growers at higher risk for non-compliance with requirements.

Example - Grower sample taken from the Farm Verification Group:	
Midsouth 87 growers	Low: 4.6= 5 grower visits Medium: 6.99= 7 grower visits High: 9.3= 9 grower visits
Southwest 169 growers	Low: 6.5= 7 grower visits Medium: 9.75= 10 grower visits High: 13 grower visits
West 43 growers	Low: 3.2= 3 grower visits Medium: 4.91= 5 grower visits High: 6.55= 7 grower visits
Southeast 96 growers	Low: 4.89= 5 grower visits Medium: 7.34= 7 grower visits High: 9.7= 10 grower visits

D1.1.2 The same grower selected one year should not be in the sample for the next selection (for up to three years), ensuring that each year brings a new set of growers to the second-party verification assessment process.

D1.1.3 The verification assessments should be conducted by the Farmer Group Coordinator. This could be the aggregator who is helping the growers through the Trust Protocol, or it could be a representative of the Trust Protocol.

D1.1.4 The same individual should not conduct the second-party verification assessments more than three times in a row. In certain circumstances, this will be allowed: when a grower markets with the same company (merchant or cooperative) year after year, it will mean that they will have the same aggregator who can conduct the second-party verification assessments consecutively.

D1.1.5 The second-party verification assessment will cover the same scope as the third-party verification assessment at the farm level, and the outcomes will be documented at the Farmer group level by the Trust Protocol.

D2. Data for Verification Assessment: Self-Assessment Questionnaire

D2.1.1 The regions in which growers are producing cotton will inform a grower's Farm Verification Group and scoring of the Self-Assessment Questionnaire that the grower completes.

D2.1.2 The Self-Assessment Questionnaire will remain the same nationwide as will the scope of verification assessments.

D2.1.3 The contextual nuances of each region, Farmer group, and questionnaire module becomes important during the scoring for the verification assessment. Each region will have their own slightly different scoring methodology, resulting in more appropriate analyses for comparison and scoring.

NOTE: Cotton cultivation practices are not standard across all regions. Some practices are standard or common in some regions, while some are not employed in other regions. For example, the southeast with greater rainfall will depend on rain-fed irrigation practices whereas in the southwest with less rainfall, the operation will rely heavily on irrigation systems to support plant growth and promote water conservation.

D2.1.4 The verification body shall confirm whether the appropriate Protocol Platform module is being used before conducting the verification assessment.

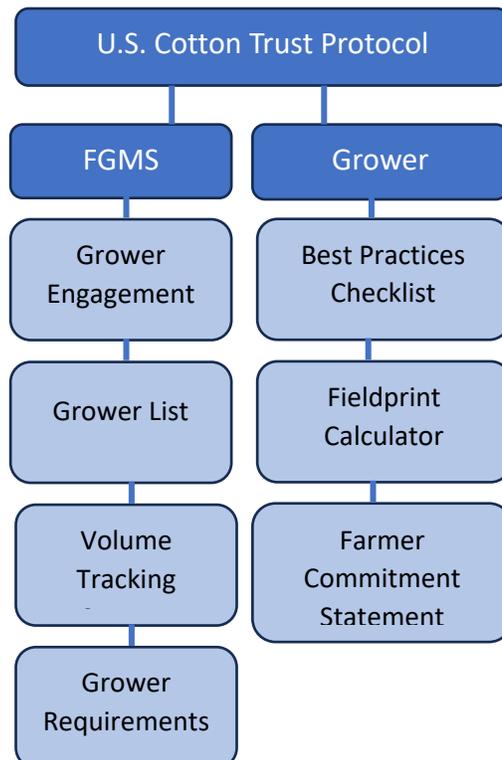
D2.1.5 The Trust Protocol shall send the verification body the following information to review at least ten working days before the onsite verification assessment visit, and in time for the remote half-day verification assessment visit (described below in section D3.1.5):

- a. Applicable grower list for each FGMS
- b. For growers selected for a verification assessment:
 - i. Applicable Self-Assessment Questionnaire
 - ii. Fieldprint Calculator data
 - iii. Farmer Commitment Statement

D3. Third-Party Verification Assessments

D3.1 Overview: Third-Party Verification Assessment Stages

D3.1.1 The third-party verification assessment includes two stages aimed at reviewing grower data at the Farm Verification Group level (FGMS level) and the individual grower level as outlined in the diagram below:



D3.1.2 The verification assessment for each grower selected for third-party verification assessment has two components, a remote component and in-person component, and the assessment process includes review of information from the grower at two levels:

- a. FGMS group level
- b. Individual farm level

D3.1.3 The third-party verification assessment shall be scheduled in two stages.

D3.1.4 The first stage of the third-party verification assessment shall focus on review of the FGMS group level data as outlined in Section D3.3.

D3.1.5 The first stage of the third-party verification assessment process should be completed remotely and have a minimum duration of half a working day (unless otherwise noted by the verification body or the grower). The review shall cover at a minimum:

- a. The FGMS level documents and all documents for the sampled grower.
 - i. FGMS level: Review the grower list, grower volumes, implementation method, etc.
 - ii. Grower level: Review the results of the second-party verification assessment, identifying any *corrective actions*.
 - iii. Grower level: Review the farmer commitment statements.

D3.1.6 The first stage of the third-party verification may be conducted on site if requested by the verification body or the grower.

D3.1.7 The second stage of the third-party verification assessment shall focus on review of the individual farm level data and related farm practices and characteristics.

D3.1.8 The second stage of the third-party verification assessment shall be conducted on-site at the farm and have a minimum duration of a half day, not including follow-up by the verification body to assess non-compliances.

D3.1.9 The on-site third-party verification assessment shall cover, at a minimum:

- a. A walk through of the farm areas indicated in the **Verification Checklist** and review of any additional paperwork required for the verification of the Self-Assessment Questionnaire and Fieldprint Calculator data.
- b. The verification body may request additional documentation for review based on the guidance in the **Verification Checklist**.

D3.2 Third-Party Verification Assessment Process

D3.2.1 Each of the two third-party verification assessment stages shall follow the outlined activities in the chart below and include an opening meeting, data collection and verification activities, and a closing meeting:

Opening Meeting	<ul style="list-style-type: none"> • Present verifier team • Explain assessment process- Time and documents needed • Explain confidentiality of grower information
Data Collection and Verification	Review documents or interview the appropriate people, to gather the information needed to verify U.S. Cotton Trust Protocol information
Closing Meeting	Explain any non-compliances, deviations, or variations found during the visit, and the process for closing them.

D3.2.2 Opening meeting: Each stage of the verification assessment shall begin with an opening meeting between the verifier and the grower where the verifier shall conduct the following:

- a. introduction of the verification assessment team
- b. explanation of the verification assessment process, and
- c. explanation to the grower about confidentiality of grower information shared in the verification assessment.

D3.2.3 Data collection/verification: The second stage of the verification assessment shall include a data collection and verification process to ensure that the grower filled out the Self-Assessment Questionnaire accurately and completely. This includes review of the following:

- a. The grower’s use of the Fieldprint Calculator;
- b. The answers that the grower presented on their self-assessment using the Self-Assessment Questionnaire. The verifier may ask to see documentation relevant to the Self-Assessment Questionnaire responses using the guidance included in the **Verification Checklist**.
- c. Review of completion of the Farmer Commitment Statement.

D3.2.4 Closing meeting: The closing meeting shall be used to inform the grower about:

- a. any *deviations* and *non-compliances* found during the verification assessment process (see Section F1), a
- b. explanation to the grower about the process for resolving any non-compliances (see Section F1)

D3.3 Stage 1: Farm Group Management System Verification

D3.3.1 Verification of the FGMS requires assessment of the management processes and systems at the Farm Verification Group level.

D3.3.2 The objective of this part of the verification is to ensure that the processes related to grower engagement, cotton volume accounting, and grower documentation are being implemented and maintained.

D3.3.3 This verification takes place with a representative from the cooperative, aggregator, or Trust Protocol, who has managed most of the onboarding and management processes for the growers in the Farm Verification Group.

D3.3.4 The FGMS shall appoint at least one person, typically the Farmer Group Coordinator, to oversee implementation of the Trust Protocol requirements and maintain written procedures for how the growers will be engaged and managed.

D3.3.5 The FGMS shall regularly evaluate the implementation of procedures and conformance with Trust Protocol requirements.

D3.3.6 The FGMS must maintain an up-to-date list of growers in the Farm Verification Group.

D3.3.7 The FGMS shall evaluate completion of the grower requirements as outlined in the **Program Manual** and including the below:

a. Self-Assessment Questionnaire	i. The coordinator should have all of the surveys for the growers in the Farm Verification Group. ii. The verifier can choose to look at a random selection of growers' responses.
b. Fieldprint Calculator Data Input	i. The Farmer Group Coordinator should have recorded interactions with the growers related to the use of the Fieldprint Calculator, and/or the Fieldprint Calculator section of the Protocol Platform. ii. The data should be shared with the verifier at least ten days before the half-day remote FGMS level verification.

D3.4 Stage 2: Farm Level Verification

D3.4.1 Verification of the individual farm requires assessment of the Self-Assessment Questionnaire which is made up of questions relating to farm practices.

D3.4.2 The farm practices are separated into three categories including Mandatory Practices for every region/group, Recommended Practices, and In-depth Farm Analysis questions:

- a. Mandatory Practices (58 Questions)
 - i. Encompasses practices required by U.S. federal law and U.S. Cotton Trust Protocol Principles and Criteria
 - ii. Full compliance is mandatory for maintaining U.S. Cotton Trust Protocol membership unless a practice is not applicable under certain conditions
 - iii. Covers critical areas including worker safety, environmental protection, and regulatory compliance

- iv. Non-compliance with any mandatory practice may result in immediate review of the grower's membership in the U.S. Cotton Trust Protocol
- b. Recommended Practices (63 Questions)
 - i. Region-specific best practices that support sustainable cotton production
 - ii. Requires yes/no responses to measure adoption of best management practices
 - iii. Helps identify areas for improvement and development
 - iv. Demonstrates commitment to continuous advancement in sustainable agriculture
 - c. In-Depth Farm Analysis (10 Questions)
 - i. Detailed quantitative assessment of specific farming operations
 - ii. Requires percentage-based responses to measure implementation levels
 - iii. Provides measurable metrics for tracking progress
 - iv. Supports data-driven decision making for farm management

D3.4.3 Farm practices are categorized by level of importance based on the specific region. Each region has their own applicable and non-applicable practices, but the questionnaire remains the same for all growers nationwide.

D3.4.4 The different levels of relevance in the practices impact the scoring of the assessment in the Protocol Platform.

D3.4.5 The growers' answer choices for the Self-Assessment Questionnaire questions are:

1. In compliance
2. Yes/No
3. Variable responses possible (quantitative questions)

NOTE: Each of these choices has been assigned a score based on the environmental impact of the practice. For example, when a grower answers a question relevant to their region/group option 1, the grower will receive the highest number of points for implementing that practice. In turn, when they choose option number 4, they will get the least number of points. ²

D3.4.6 Some of the responses can be verified through a remote documentation check, and others through an on-farm visit/farmer interview. If there are any discrepancies between the growers' responses and the verifier's findings, then the verifier's findings shall be used for calculating the new score.

² The scoring system described in this section is part of an internal ranking process created by Trust Protocol to assist verifiers and the Trust Protocol in understanding the relative impact of various practices.

Section E- Risk Assessment and Sampling of Farm Verification Groups

E1. Identifying the Risk Level for the Farm Verification Group

E1.1.1 The Trust Protocol uses a risk-based sampling methodology for the Farm Verification Group using FGMS third-party verification assessment results from the previous year. This methodology results in the identification of the sample of growers that will receive third-party verification assessments each year.

E1.1.2 The Trust Protocol shall determine a risk level for the Farm Verification Group based on the outcomes of the third-party verification assessments conducted the previous crop year.

E1.1.3 The Trust Protocol shall conduct the risk assessment of the Farm Verification Group prior to planning the third-party verification assessments for a given year to ensure the correct number of sites are selected for second-party verification assessments. The risk assessment criteria to assign the risk level of the Farm Verification Group are outlined in the table below:

	Low Risk	Medium Risk	High Risk
Farm Level: Third-party verification results from previous year	a. Maximum of 4 non-compliances found at the farm's verification assessment during the previous year's third-party verification.	b. 5-8 non-compliances found at the farm's verification assessment during the third-party verifications.	c. 8-11 non-compliances found at the farm's verification assessment during the third-party verifications.

E1.1.4 The types of deviations and non-compliances that a verification body may identify are defined in Section F1.

E2. Sampling for Third-Party Verification Assessments

E2.1.1 Growers who are part of the Farm Verification Group shall be available for the third-party verification assessment, unless they have been through a second-party verification assessment in the last 12 months.

E2.1.2 Growers who have been through a second-party verification assessment in the last 12 months are exempt from being chosen for the third-party verification assessment for the current year.

E2.1.3 Any individual grower within a Farm Verification Group shall only be chosen for a third-party verification assessment once every three years.

E2.1.4 The Trust Protocol and the verification body shall be responsible for confirming the participation of growers in previous second-party and third-party verification assessments. The total number of growers should be used to calculate the number of growers selected for the third-party assessments.

E2.1.5 The Trust Protocol shall follow the below sampling methodology when selecting growers for third-party verification assessments. The number of verification assessments selected from each Farm Verification Group shall equal the square root of each Farm Verification Group, rounded to the nearest whole number, per the examples below:

Third-party verification assessment sample size: Square root of Farm Verification Group
--

Midsouth 87 growers	9.3= 9 growers
Southwest 169 growers	13 growers
West 43 growers	6.5= 7 growers
Southeast 96 growers	9.7= 10 growers

E2.1.6 The growers chosen for the verification shall also represent the proportionate number of growers in each region (for example, if the Farm Verification Group contains 50% of growers growing cotton in Texas, and 50% who are growing cotton in Oklahoma, then 50% of the growers chosen for the sample should be in Texas, and the other 50% in Oklahoma).

Section F- Evaluation of Compliance

Due to the program’s spirit of continuous improvement, the scoring mechanisms for the Self-Assessment in the Protocol Platform checklist go beyond “pass/fail.” There are certain practices that are considered required, and if the grower is not in compliance, it will result in the need for a corrective action. However, the scoring mechanism in the Protocol Platform checklist was designed to provide feedback to the grower regarding their overall sustainability as compared to the average of all participating growers.

F1. Identification of Non-compliances, Deviations, and Variations

F1.1 Self-Assessment Questionnaire Evaluation

F1.1.1 A non-compliance occurs when any Mandatory Practice from the Self-Assessment Questionnaire is not implemented on the farming operation.

F1.1.2 A deviation at a grower level occurs when a Recommended Practice from the Self-Assessment Questionnaire is not implemented on the farming operation, or when one of the pre-requisites for joining the program has not been met.

F1.1.3 Different corrective actions shall be required of the grower when non-compliances or deviations occur.

F1.1.4 Verification bodies shall apply the *Corrective Action Plan* follow-up outlined in the table below, along with the timeframe needed to complete the action (see Section F3):

	Third-Party Verification Assessment Finding	Action	Timeframe
a. Farm Level	Maximum of 12 verified non-compliances found at the Farm level	<p>Grower or FGMS should develop and submit a Corrective Action Plan after the grower visits take place.</p> <p>This shall occur within 30 business days of receipt of the verification report from the verification body.</p> <p>If action plan or evidence of corrective action implemented is not shared with the verifier, then the grower verification will be cancelled and rescheduled after the documentation has been received.</p>	30 business days

F1.2 Fieldprint Calculator Evaluation

F1.2.1 The verification for the Fieldprint Calculator portion of the Trust Protocol shall cover assessment on the use of the Fieldprint Calculator, as well as the accuracy of data being provided by the grower.

F1.2.2 Fieldprint Calculator use shall be checked at both the FGMS level and at the grower level. The FGMS coordinator should have the grower's Fieldprint Calculator Data accessed via the Protocol Platform.

F1.2.3 All questions in the Field to Market category are Priority level "Required."

F1.2.4 *Variations* occur when required practices in the Fieldprint Calculator are not implemented on the farming operation.

F1.2.5 The verifier shall assess the following:

- a. Whether growers are using the Fieldprint Calculator
- b. Whether growers are recording at least 10% of their planted cotton acreage and information into the platform, and;
- c. Whether data being reported into the calculator is correct.

F1.2.6 The verifier shall assess one of the fields selected for entry by the grower in the Fieldprint Calculator and accurately compare self-reported data with the data available at verification.

NOTE: The Field to Market questionnaire contains questions related to crop rotation, irrigation, farm management, and nutrient/fertilizer management. When answering these questions, growers should select fields that represent 10% of their overall planted cotton acreage, and input the specific data related to each of those fields into the Fieldprint Calculator.

Example: How to Verify Fieldprint Calculator data

The verifier will review that the self-reported information for each data point is correct.

For example, the verifier will review the acreage/yields at the farm level and ensure that the acreage/yields reported in the platform are accurate.

F2. Scoring Methodology

F2.1.1 At the grower level, a deviation and/or non-compliance occurs when the grower's answers on the Self-Assessment Questionnaire vary from the answers found by the verifier in Stage 2 (on-farm assessment, See Section D3.2) or during the documentation review.

F2.1.2 A non-compliance may also occur during the verification of the Self-Assessment Questionnaire when a Mandatory practice is found to not be implemented.

F2.1.3 Non-compliances and deviations are used by the Trust Protocol to identify and implement improvements to the verification process and scoring methodology for Farm Verification Groups.

F2.1.4 The scoring system for the Self-Assessment Questionnaire is analyzed and improved to reflect the growing region. All Mandatory Practices are consistent across all regions/groups. Only the Recommended practices vary from region to region.

- a. Non-compliance: When one of the Mandatory Practices in the Self-Assessment Questionnaire is not being implemented.
- b. Deviation:
 - a. When the verifier identifies that the grower answered one of the recommended practices in the Self-Assessment Questionnaire with an answer that is not consistent with actual implementation on the farming operation.
 - b. Can result in a change in performance level for that grower.

F2.1.5 Deviations do not require any corrective actions.

F2.1.6 A non-compliance requires a Corrective Action Plan (CAP) to be submitted to the verifier according to the below requirements:

- a. If less than 12 non-compliances are found at any farm, the grower or the FGMS coordinator shall send a CAP or evidence of non-compliance closure to the verifier within 30 days of receipt of the verification report.
- b. The maximum number of non-compliances that can be found at any farm is 12.
- c. If more than 12 non-compliances are found at any farm, then the verification shall be suspended, and re-verification should be planned once the grower has addressed the non-compliances.

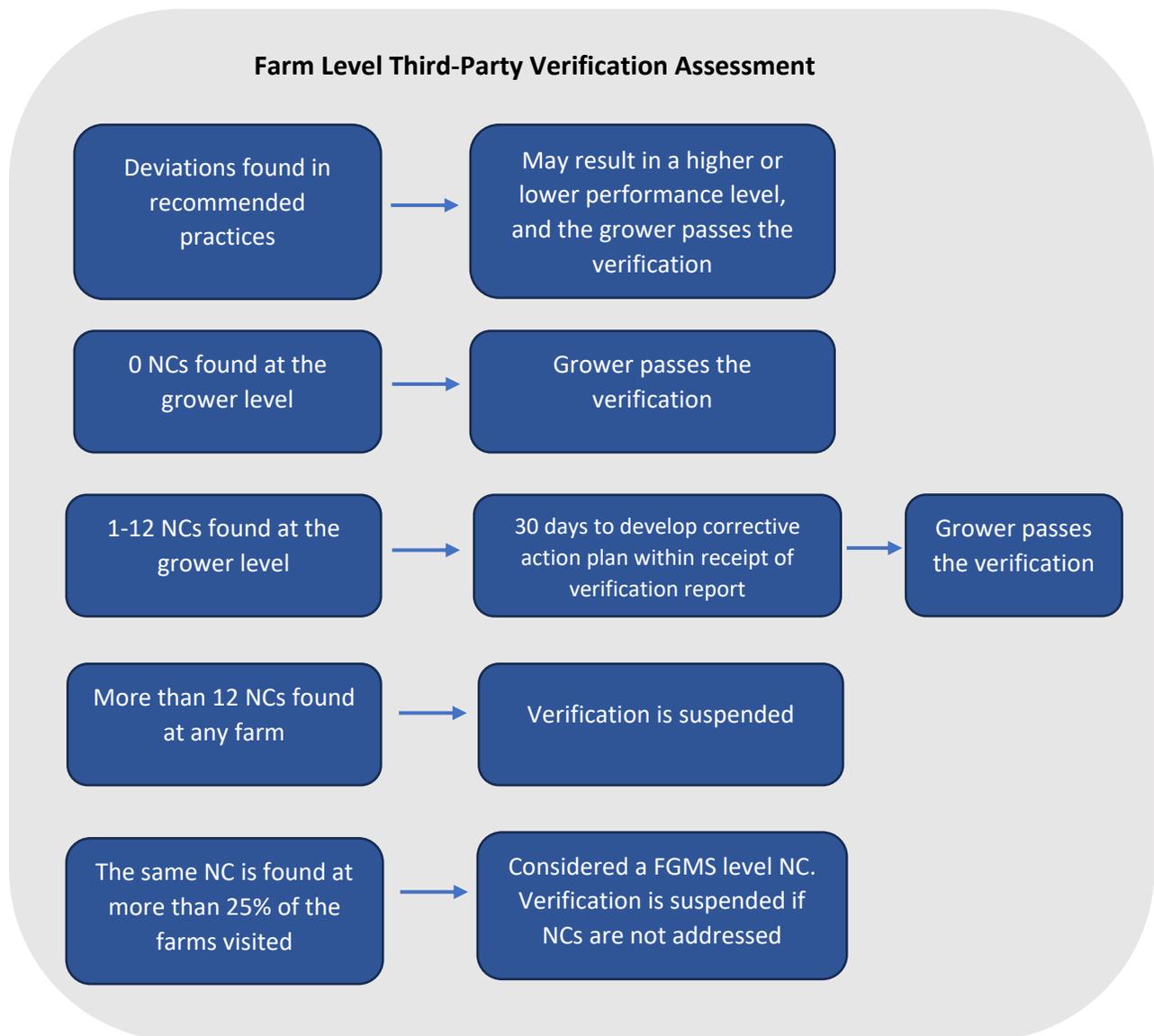
F3. Corrective Action Plans

F3.1.1 To address a non-compliance, the grower or the FGMS shall submit a CAP for review and approval by the verifier within 30 days of receipt of the verification body's verification report.

F3.1.2 The information included in the CAP:

- a. Should correct any immediate issues identified during the verification visit,
- b. Shall provide a timeline for implementation,
- c. Shall designate the person responsible for correction, and/or
- d. Can describe how the issue will be prevented in the future

F3.1.3 A CAP may include pictures of the corrected issue, evidence of consultation with an expert on the issue, proof of employee training, or other evidence.



F4. Reporting of Verification Results

F4.1.1 After the conclusion of verification assessments, the verification body shall create a verification report within 30 days of the assessment date which documents the following for the farms in the Farm Verification Group sample:

- a. For each farm's verification assessment: Non-compliances, observations, and circumstances during the remote FGMS portion of the verification assessment (Stage 1, see Section D3.3) and the on-site farm verification assessment (Stage 2, see Section D3.4).
- b. A summary of the grower's own Protocol Platform checklists, and list of the deviations, non-compliances, or variations for each grower.

F4.1.2 The individual grower reports shall be updated to reflect any closures of non-compliances during the period between the verification assessment and submission of the CAP

F4.1.3 If the verification assessment was considered complete and successful, then an attestation shall be issued by the verification body.

F5. Reverification

F5.1.1. If all non-compliances from the previous verification assessment (as indicated in the CAP) are not closed before the reverification assessment to the respective farm, a reverification visit may be scheduled.

F5.1.2 The attestation shall be valid for one year and shall list the volumes involved in the group, the levels of sustainability reached, and a list of the growers who participated in the third-party verification assessment.

F5.1.3 The reverification assessments may be scheduled at least 60 calendar days before the expiration date on the valid attestation to allow enough time to close out any non-compliances, and for the verifier's work to be reviewed for quality checks.