Program Manual:
The U.S. Cotton Trust Protocol

Version 3.0 – February 2025

Contents

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 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 goal 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 on-farm 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 sustainability goals for 2025 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 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 supports growers in identifying opportunities for continuous improvement.

A4. Stakeholder Engagement

The Trust Protocol was developed with the participation of multiple cotton industry stakeholders, as well as other stakeholder groups with an interest in environmental sustainability and responsible production practices.

At its inception, leaders from U.S. cotton industry organizations including the National Cotton Council, Cotton Board, Cotton Council International, and Cotton Incorporated came together and engaged 10 technical experts in cotton biology and production to discuss how future technologies would impact trends in 14 key performance indicators. These indicators formed the basis of the Trust Protocol's Principles and Criteria 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 measures continuous improvement and environmental metrics. Goals have been defined for the next five, ten and thirty 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.

A5. About the Verification Program Manual

A5.1 Introduction and scope

A5.1.1 The Trust Protocol Verification Manual defines the requirements for verification bodies conducting verification assessments against the Trust Protocol's Principles and Criteria.

A5.1.2 Adherence to these requirements is also monitored by the Trust Protocol as part of scheme owner oversight to assess verification body performance.

A 5.1.3 These requirements were written to align with the ISEAL Code of Good Practice v1.0.

A5.1.4 The requirements were developed and revised by the Trust Protocol in consultation with assurance program stakeholders including verification bodies and the Trust Protocol Board.

A5.1.5 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 requirements. Clarification of requirements may be incorporated into supplementary and guidance documents prior to the next revision.

A5.1.6 Applicability and scope of these requirements:

    a. These requirements are applicable and required for verification bodies that are authorized by the Trust Protocol to conduct verification assessments against the **Trust Protocol Principles and Criteria.**
    b. This document version is binding over any previous versions of the Trust Protocol Program Manual.

c. Section C provides the framework for growers to understand the requirements to enroll and maintain participation in the program. This includes the documents that growers are expected to complete, the process of second-party verification assessments, and a summary of the third-party verification process. For detailed information related to the third-party verification process, please refer to the **Verification Procedures**.
d. Section E outlines the requirements for third-party verification bodies and their authorization.
e. Section F outlines the oversight responsibilities of the Trust Protocol for the verification process.

A5.2 Changes in the Verification Manual (V2.0 to V3.0)

Change	V2.0	V3.0
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 according to the system stakeholder to which requirements apply	Some requirements for multiple stakeholders were grouped into the same paragraphs or sections.	Requirements are grouped in sections as follows: Section C: Verification Requirements for Growers Section D: Verification Requirements for Aggregators Section E: Verification Body Requirements
Oversight of verification bodies	Oversight functions mentioned	New Section F: Oversight Responsibilities of the Trust Protocol

Section B- Terms and Definitions

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

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- Verification Requirements for Growers

C1. Grower Enrollment Requirements

C1.1 *Growers* who wish to participate in the program shall complete the following requirements, via the online grower enrollment platform created by the Trust Protocol (*Protocol Platform*):

    a. Complete grower enrollment via the Trust Protocol website at www.trustuscotton.org by completing these activities:

        i. The grower may click on "join now" tab to begin the registration process. Once a grower is registered in the Protocol Platform, the grower will have access to their dashboard. If a grower has an existing account, the grower may click on 'Login' to access the account.

        ii. Within their dashboard, the grower can find the six enrollment steps that are required from the Trust Protocol in order for the grower to be a Trust Protocol member.

        iii. Complete a self-assessment using the Self-Assessment Questionnaire.

    b. Engage in the Fieldprint Calculator (FPC); and

    c. Sign the *Farmer Commitment Statement*.

C1.2 It is the responsibility of the *originating aggregator*, or the Trust Protocol, to ensure that all growers within the group comply with the enrollment requirements. An aggregator is a gin, merchant, or cooperative and any of these may be referred to as an aggregator.

C1.3 The Trust Protocol provides technical assistance for grower enrollment where necessary to complete the requirements.

C1.1 Grower Self-Assessment Questionnaire

C1.1.1 The Grower Self-Assessment Questionnaire outlines best management practices identified by the Trust Protocol with particular emphasis on cotton cultivation in the United States.

C1.1.2 The questionnaire has been adjusted to reflect practices specific to United States cotton production regions and shall be completed by each grower participating in the program, using a self-assessment.

C1.1.3 The questionnaire covers the following areas of cotton production and practices:

    a. Soil Health and Regenerative Practice Management,

    b. Nutrient Management,

    c. Water Management,

  d. Crop Protection,
  e. Chemical Management,
  f. Biodiversity,
  g. Fiber Quality, Data Management and Traceability,
  h. Farm Management, and
  i. Worker Well-being

C1.1.4 The questionnaire consists of three distinct sections grouped by the categories in the Trust Protocol's sustainability best practice principles and is applicable across all regions. The questionnaire consists of 58 Mandatory Practices, 63 Recommended Practices, and 10 In-Depth Farm Analysis questions.

C1.1.5 The Mandatory Practices exceed federal, state, and local regulatory requirements and have been identified by cotton experts to be vital in the sustainable production of cotton.

C1.1.6 To complete enrollment requirements, each grower shall respond to all of the Mandatory Practices and Recommended Practices in the Self-Assessment Questionnaire.

C1.2 Field to Market's Fieldprint Calculator

The Trust Protocol partners with Field to Market to engage growers in sustainability practices and in data collection. The Fieldprint Calculator is used by the grower to document the production practices that occur at the field level.

C1.2.1 Each Trust Protocol grower member shall complete the Fieldprint Calculator as one of the key steps of enrollment.

C1.2.2 The Fieldprint Calculator is a key component of the Field to Market platform and where growers shall input information related to the management of their farming operation on topics such as their crop rotations, nutrient and fertilizer application practices, pest management, and conservation practices, etc.

C1.2.3 The grower shall center data in the Fieldprint Calculator by using the grower enrollment platform created by the Trust Protocol. The platform is found under the Fieldprint Analysis portion of the enrollment process in the Protocol Platform, or directly on the Field to Market website or through a *Qualified Data Management Partner*.

C1.2.4 The Fieldprint Calculator uses the data entered by growers to provide a score on environmental metrics such as water quality, land use, soil conservation, soil conditioning index (soil carbon), irrigation water use, greenhouse gas emissions, biodiversity, and energy use (example presented below).
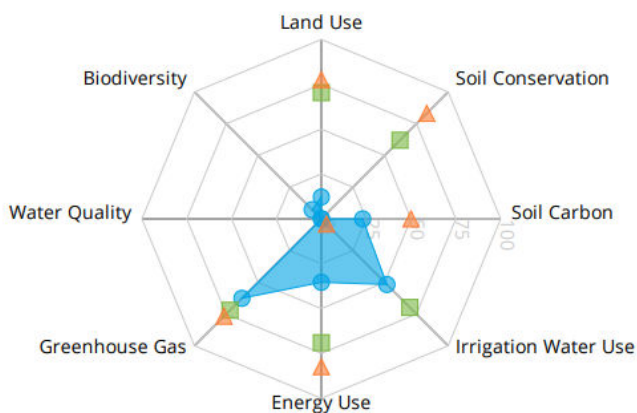
Metric	Your Result	State Benchmark	National Benchmark
Land Use (acre / lb)	0.0007	0.001	0.001
Soil Conservation (ton / acre / year)	1.1	8.9	12.9
Soil Carbon	0.54	N/A	0
Irrigation Water Use (ac-in / lb)	0.05	0.098	0.027
Energy Use (btu / lb)	5,033	7,167	9,427
Greenhouse Gas (lbs-CO$_2$e / lb)	1.6	1.8	2
Water Quality	4	N/A	N/A
Biodiversity	93%	N/A	N/A

C1.2.5 A grower may compare their results to both the state and national averages (provided by Field to Market), which help the grower understand where they stand in relation to other growers in their region or nation-wide.

C1.2.6 Any data reported externally by Field to Market or the Trust Protocol will be aggregated and preserves the grower's anonymity.

C1.2.7 No individual grower data is made available by Field to Market or the Trust Protocol unless the grower provides permission to share it with any stakeholders.

C1.2.8 Growers shall enter a minimum of 10% of their cotton acreage into the Fieldprint Calculator. This enables reasonable comparisons against both state and national averages within the Fieldprint Calculator.

C1.2.9 The grower may select the 10% of farm acres that are most representative to their entire cotton operation, and this approach to selection is recommended.

C1.2.10 Data entered in the Fieldprint Calculator will be reviewed by a third-party verifier according to the **Verification Procedures** which describe the procedures for *third-party verification assessments*.

C1.3 Cotton Production Volume Information

C1.3.1 On the Protocol Platform, a grower shall designate their cotton gin and their cotton merchandiser.

C1.3.2 The grower may submit cotton production data or bales produced in an annual harvest into the Protocol Platform and this information will be used to support the Trust Protocol's supply chain traceability program as outlined in the **Chain of Custody Requirements v1.0**.

C1.3.3 The grower may designate the gin or merchant organization to submit bale production data on behalf of the grower in the Protocol Platform.

C1.3.4 Cotton production data is centrally managed by the Trust Protocol. The Trust Protocol cotton consumption management system is managed within the *Protocol Consumption Management Solution (PCMS)*, a platform where retailers can claim *Protocol Consumption Units (PCCUs)* that are created based on actual bales uploaded into the system. This system is further described in the **Chain of Custody Requirements.**

C1.4 Grower Commitment Statement

C1.4.1 All growers participating in the program shall sign a commitment statement, indicating their commitment to sustainable farming practices. A form with this statement is generated upon completion of enrollment in the Protocol Platform and requested to be signed by the grower.

C1.4.2 The commitment statement functions as a self-declaration showing grower commitment to the goals of the Trust Protocol and to responsible production practices with an emphasis on continuous improvement.

C2. Verification Assessment Requirement

C2.1 Each grower is automatically placed into a *farm verification group* by the Trust Protocol based on the location of the growers' operations or their originating aggregators.

C2.2 If selected for a verification assessment, each grower selected shall participate and successfully complete in the third-party verification assessment to be considered in compliance with the verification program.

Section D- Verification Requirements for Aggregators

D1. Farm Verification Groups

D1.1 Growers within a farm verification group will be managed at a group level by the Trust Protocol.

D1.2 The Trust Protocol maintains oversight of the originating aggregators ensuring that the required processes, practices, and documents from the growers are in place throughout the grower's participation the program.

D2. Verification Assessment of the Farm Group Management System

This section outlines requirements for the aggregator in the verification assessment of the *Farm Group Management System (FGMS)*.

D2.1 The Farm Group Management System (FGMS) is the system used by the Trust Protocol to track the progress of the individual growers within each farm verification group, in relation to:

a. the use of the Protocol Platform,
b. the required documentation, and
c. verification requirements

D2.2 The aggregator shall maintain a grower list for each farm verification group, including individual farm production volumes.

D2.3 The aggregator shall maintain oversight of required documentation at the grower level:

a. Self-Assessment Questionnaire;
b. Fieldprint Calculator data; and
c. Farmer Commitment Statement

D2.4 The aggregator shall maintain results of the *second-party* verification assessments and any required actions.

D2.5 The aggregator shall recommend corrective actions and document grower follow through, as appropriate.

D2.6 The aggregator shall train the incoming growers about the program and ensure they:

a. Are aware of the objectives of the program;
b. Understand how to participate in the program;
c. Understand the program requirements;
d. Are familiar with the Protocol Platform; and
e. Are familiar with the verification process.

D3. Second-Party Verification

D3.1 The Trust Protocol uses *second-party verification* assessments for the following purposes:

a. To enable additional review of grower compliance with requirements outlined in Section C, and to supplement third-party verification assessments.
b. To confirm characteristics of the systems, data, and practices that were verified during the verification assessment cycle.

D3.2 Second-party verification assessments are conducted annually on the square root of the farmer group, multiplied by the coefficient of risk for the group. The coefficient of risk is determined based on the outcome of the third-party verification assessments. This process is described in the **Verification Procedures**.

D3.3 The second-party verification assessment will cover the same scope as the third-party verification, and the outcomes from these verification assessments will be documented at the farm verification group level, through the Trust Protocol.

D3.4 The scope of the second-party verification assessment will include verifications of the following:

    a. Self-Assessment Questionnaire;
    b. Fieldprint Calculator data; and
    c. Farmer Commitment Statement

D3.5 Second-party verification assessments will not be duplicated with the same growers annually, ensuring a different group of growers are assessed each year.

D3.6 If there were any variations identified in the previous years' second-party verification assessment, the aggregator shall provide evidence for closing these variations as noted in **Verification Procedures.**

D3.7 The second-party verification assessment should be conducted by the originating aggregator who is helping the growers through the Protocol Platform; or they could be conducted by a representative of the Trust Protocol.

Section E- Verification Body Requirements

The requirements for verification bodies authorized to conduct third-party verification assessments are outlined in this section to help ensure that proper management, quality, and tracking systems are in place to assure the quality and consistency of the third-party verification process.

E1. Verification Body Eligibility Requirements

E1.1 All *Authorized Verification Bodies* shall maintain ongoing adherence to the eligibility requirements detailed in this section. These requirements assure the quality and consistency of verification practices among Authorized Verification Bodies.

E1.2 Authorized Verification Bodies shall have one of the following accreditations to offer certification services:

a. ISO 17021 Management System accreditation: Conformity assessment: requirements for bodies providing audit and certification of management systems), or

b. ISO 17065: Conformity assessment: requirements for bodies certifying products, processes, and services, or equivalent.

E1.3 Accreditation to ISO standards ensures the competence of the verification body in the implementation and maintenance of internal mechanisms, thus supporting the credibility, competence, and basis for verification body oversight by the Trust Protocol. Verification body management systems shall document the following characteristics:

a. Auditor qualifications

b. Relevant training records

c. Internal procedures describing Trust Protocol verification program implementation and management

E1.4 The Authorized Verification Body shall have experience with the verification or certification of other sustainability standards within the agricultural or agribusiness sector.

E1.5 The Authorized Verification Body shall understand agricultural practices specific to cotton production in the United States.

E1.6 The Authorized Verification Body shall engage with the Trust Protocol to determine what level of organizational capacity building is required to become familiar with the Trust Protocol. Topics shall include:

a. Trust Protocol program objectives

b. Trust Protocol online platforms

c. Technical competence (best practice impacts reports, regional differences in cotton production, etc.)

d. Relevant documentation related to other verification body guidance or training to support effective verification assessments

E1.7 The Authorized Verification Body shall have procedures in place to ensure correct implementation of the requirements outlined in the **Verification Procedures**.

E1.8 The Authorized Verification Body shall have a system in place to monitor any required corrective actions resulting from verification assessments.

E1.9 The Authorized Verification Body shall report an assured result of verification upon completion of each third-party verification assessment.

E1.10 The Authorized Verification Body shall keep the records of verification assessments conducted and respective verification reports for at least 6 years.

E2. Authorization of Third-party Verification Bodies

E2.1 The Trust Protocol is the *Authorization Body* responsible for approving/rejecting requests for conducting third-party verifications with growers involved in the program.

E2.2 Third-party Verification Bodies that wish to offer verification services against the Trust Protocol's Principles and Criteria shall meet the requirements outlined in this section and formally apply for authorization with the Trust Protocol.

E2.3 The following requirements and criteria will be used to assess a verification body that would like to become authorized to conduct third-party verifications against the Trust Protocol's Principles and Criteria:

E2.3.1 The verification body shall include the following in its application to become an authorized verification body:

a. Copy of valid ISO 17021 Certificate;
b. Desired geographic scope of verification indicating regional/national service scope; and
c. List of verifiers who would have to be trained to conduct verifications according to the requirements in Sections E5, E6, and E7.

E2.3.2 Verification body applications will be evaluated based on the following criteria:
a.   Background and experience in similar verification processes;
b.   Staff expertise and overall experience of personnel assigned to the work;
c.   Time required to accomplish the requested services;
d.   Responsiveness to requirements; and
e.   Estimated costs for rendering services.

E2.3.3 The stated criteria may be supplemented, weighted or revised at the sole discretion of the Trust Protocol.

E2.4 The Trust Protocol designates approved verification bodies as "Authorized Verification Bodies."

E2.5 The Trust Protocol is responsible for all decisions regarding the authorization status of a verification body, including application, approval, and suspension.

E2.6 The Trust Protocol is responsible for managing and communicating changes to the scope and procedures for authorization of verification bodies.

E3. Third-party Verification Assessment Requirements

E3.1 The scope of the third-party verification assessment is outlined in the **Verification Procedures**. The farm verification group shall participate in a third-party verification assessment for the farm verification group to be considered in compliance with verification requirements.

E3.2 The third-party verification assessment for the farm verification group shall cover the following:

Assessment Level	Scope of Verification Assessment	Location of Verification	Duration
a. FGMS	i. Grower list + volumes ii. Required documentation at grower level iii. Results of the second-party assessments + any required actions iv. Training records related to participation in the program	Can be conducted remotely or in person (depending on client's request and auditor's suggestion).	½ day minimum
b. Grower	i. Required documentation according to Section C ii. In-person farm visit	Some documents may be sent in advance (see the **Verification Checklist**). Farm visit shall be in person.	½ day minimum

E3.3 The sample size for third-party verification assessment will be based on the square root of the number of farms in the farm verification group.

E3.4 The verification must be conducted by an Authorized Verification Body who meets the requirements outlined in Sections E1 and E2 of these requirements.

E3.5 Growers who participated in the second-party verification assessments within one year of the third-party verification, are exempt from participating in the third-party verification.

E3.6 Growers can only be chosen for the third-party verifications once every three years. An exception is if the verification body requires a third-party verification assessment to confirm closure of corrective action(s) from the previous third-party verification assessment.

E3.7 The verification body shall use the scoring mechanism established by the Trust Protocol which is centered on continuous improvement using levels of conformity as a baseline. The scoring mechanism is based on the following criteria:

   a. Levels of conformity are assessed against the **Trust Protocol Grower Self-Assessment Questionnaire** completed by growers in the Protocol Platform and are based on required and recommended criteria.
   b. Selected grower practices from the Grower Self-Assessment Questionnaire are considered requirements (Mandatory Practices)

c. Selected grower practices from the Grower Self-Assessment Questionnaire are recommended and are designated practices for the grower to achieve improvements over time based on the local conditions where the grower is farming.

d. To successfully pass the third-party verification assessment, a grower shall be in compliance with all of the Mandatory Practices from the Grower Self-Assessment Questionnaire.

E3.8 The Authorized Verification Body shall follow the detailed procedures outlined in the **Verification Procedures** in order to consistently apply the scoring mechanism and determine the verification assessment result.

E4. Subcontracting Requirements for Verification Bodies

E4.1 Authorized Verification Bodies may subcontract (outsource) verification work to an affiliate office, external body or person, subject to their compliance with the Trust Protocol requirements for verification assessment teams as set out in this section.

E4.2 The following requirements shall apply for subcontractors contracted by the Authorized Verification Body:
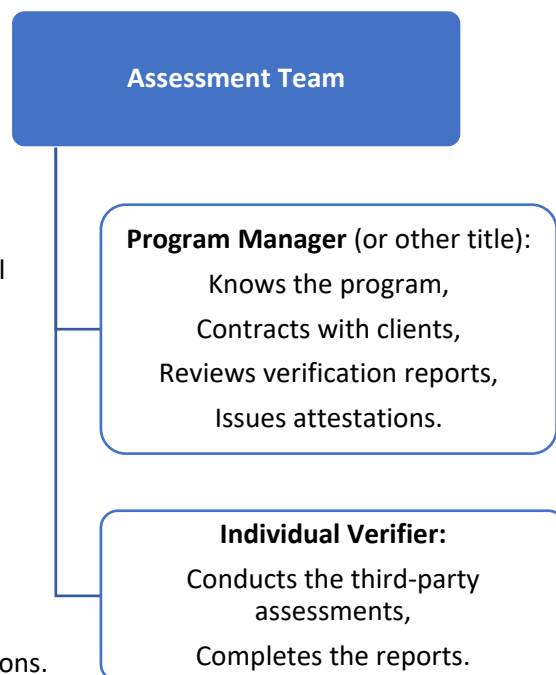
a. The Authorized Verification Body shall have a formal agreement and/or contract with the subcontractor;

b. The Authorized Verification Body shall have documented procedures for managing its relationship with the subcontractor according to the requirements outlined in this document;

c. The Authorized Verification Body shall have documented mechanisms to review the performance of the subcontractor and ensure that the subcontractor is fully in conformance.

d. Subcontractors shall be subject to monitoring by the Trust Protocol team.

e. Subcontractors shall comply with all applicable requirements in this Program Manual.

E5. Verification Body Competence: Verification Assessment Team Requirements

E5.1 Organizations providing third-party verification assessments for the Trust Protocol shall have the adequate structures and roles in place to ensure that the program is operating in accordance with this Program Manual.

E5.2 The verification *assessment team* shall be comprised, at a minimum, of the following:

a. A verifier or qualified individual who conducts the actual verification assessment, and
b. one other person who has received training to conduct Trust Protocol verification assessments. This role should be something similar to a program manager. This individual shall:
    i. be able to explain the requirements and processes with growers or other interested parties.
    ii. be in charge of the quality review of the verifiers' work, and
    iii. may also be responsible for issuing attestations.

Assessment Team

Program Manager (or other title):
Knows the program,
Contracts with clients,
Reviews verification reports,
Issues attestations.

Individual Verifier:
Conducts the third-party assessments,
Completes the reports.

E6. Verifier Requirements

E6.1 All verifiers, whether employees or subcontractors, shall have the following minimum qualifications:

a. Training (by Authorized Verification Body) according to E6.2
b. ISO 9001 qualification (Quality management systems)- ensuring their knowledge to conduct audits, raise non-conformities, analyze corrective action plans, and identify root causes.
c. Knowledge of row crop production, soil management, plant protection, fertilization, irrigation technologies and energy systems on farm, as either part of a formal qualification (such as a University degree whereby these topics were covered through different classes, or a continued education course specializing in one of the topics), or, at least two years relevant experience on a farm (through auditing or previous experience on a farm).
d. Experience auditing sustainable agriculture schemes relevant to the row crops. These include voluntary sustainability systems (e.g. Rainforest Alliance, Fairtrade, SAI/ FSA, Global GAP) and/or private sustainable agriculture programs (e.g. Unilever SAC, PepsiCo, SFP).
e. Successfully completed five sustainability audits/verifications within the last year.

E6.2 An auditor training package shall be developed by the Authorized Verification Body or in partnership with the Trust Protocol team and should be approved by the Trust Protocol team.

E6.3 Training shall be conducted by the Authorized Verification Body or in partnership with the Trust Protocol and will cover the following:

a. Trust Protocol program objectives, requirements, and procedures
b. FGMS Requirements
c. Farm Level Requirements
d. Verification Procedures
   i. Requirements at FGMS + Farmer Level
   ii. Identifying Risk Levels
   iii. Verification Sampling Methodology
   iv. Evaluation of Non-Compliances
   v. Verification assessment reporting

E7. Impartiality and Conflict of Interest

E7.1 Any person or entity hired by the Authorized Verification Body shall:

a. Declare any interest that may potentially affect the verification process and/or which could possibly constitute a conflict of interest, in advance of engaging in the verification process.
b. Report immediately to the Authorized Verification Body any circumstance or pressure that may influence their independence or confidentiality during the verification process.

E7.2 The Authorized Verification Body shall retain records of any actual and potential conflicts of interest from its verifiers.

E7.3 The Authorized Verification Body shall also retain records of its reasoning behind any decisions, including all actions taken to resolve any potential or actual conflict of interest, for at least six years.

E7.4 The Authorized Verification Body shall have its own documented procedures for preventing, reviewing and acting upon any conflict of interest declarations made by its employees. These procedures shall ensure that the declared potential or actual conflict of interest does not influence the evaluations, actions, or decisions of the Authorized Verification Body.

E7.5 The Authorized Verification Body shall not use the same verifier for more than three consecutive visits to the same farms or FGMS.

E7.6 The Authorized Verification Body, its verifiers, and its subcontractors shall remain separate from any farm or FGMS consultations related to the Trust Protocol. They shall not have provided, or provide management advice or consultation, or technical support related to the Trust Protocol criteria

interpretation or implementation to any organization under contract with the Authorized Verification Body for verification assessment services.

E8. Confidentiality

E8.1 All information and documentation shared between the Trust Protocol, the growers, and the Authorized Verification Body will be kept confidential.

E8.2 Individual results of the third-party verifications that identify grower entity names or grower names will only be shared with the Trust Protocol and with growers participating in verification assessments.

E8.3 Growers within a group will not have access to results of the other growers.

E8.4 The Authorized Verification Body shall have a documented policy on confidentiality to share with its clients, as part of or referenced by the verification agreement. This policy will cover the handling of commercially sensitive information.

E9. Contracts of Service

E9.1 The Authorized Verification Body shall enter into a written, legally enforceable verification contracting agreement for the provision of verification assessment services with its clients (growers). The agreement must clearly indicate the scope, duration and costs related to the verification assessment services, and outline the Authorized Verification Body's and client's contractual rights and obligations.

E9.2 All Authorized Verification Bodies shall keep records of Trust Protocol verifications and related documentation for at least 6 years.

Section F- Oversight

F1. Oversight Responsibilities of the Trust Protocol

F1.1 The Trust Protocol conducts competence and performance oversight activities to support the rigor, consistency, and quality of the work of Authorized Verification Bodies, and can revoke any Authorized Verification Body's right to conduct verifications.

F1.2 The Trust Protocol may ask the Authorized Verification Body for any documentation related to past or current verifications, or for any management system documentation as outlined in Section E above.

Section G- Disputes and Complaints

G1.1 If an Authorized Verification Body wishes to make a complaint about the implementation of the procedures or requirements outlined in this document, the Authorized Verification Body shall communicate the complaint in written form to the Trust Protocol by sending an e-mail to integrity@trustuscotton.org. The Trust Protocol team will evaluate the grievance and act accordingly.

G1.2 If a grower, FGMS coordinator, or other stakeholder files a complaint about the implementation of the procedures or requirements outlined in the **Verification Procedures**, the complaint should be documented and communicated in written form to the Authorized Verification Body.

G1.3 The Authorized Verification Body shall have a written procedure for handling any incoming grievances, and the grievance presented should be handled in the manner described in that document.

G1.4 In the event that the grievance cannot be addressed properly by the Verification Body, then the stakeholder should communicate the grievance in a written form to the Trust Protocol assurance team at integrity@trustuscotton.org.

G1.5 The following timelines will apply to grievance resolution by the Trust Protocol:

a. The Trust Protocol team will evaluate the grievance and acknowledge receipt within 14 working days.
b. The Trust Protocol team will resolve the grievance within 30 working days of original submission to the Trust Protocol.

APPLICANT / DECLARATION

By signing below, the Verification Body assures that they have read the requirements outlined in this document, and that they are able to adhere to the requirements at the time of applying to become an Authorized Verification Body.

Name	:	
Position	:	
Signature	:	
Date	:	