

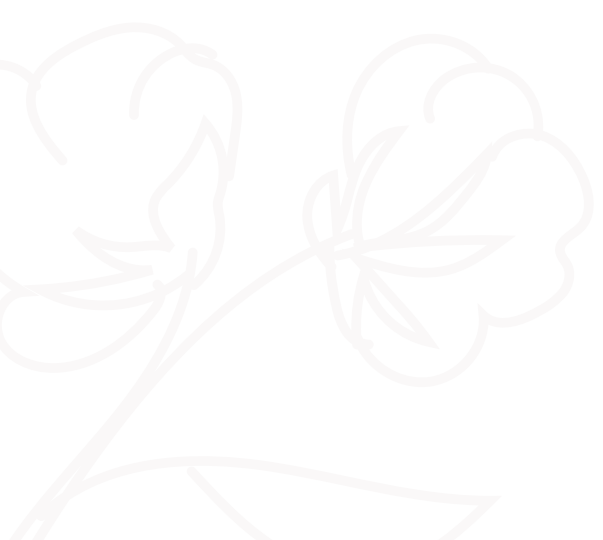


Aid by Trade Foundation Transparency Standard

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Update History

The Aid by Trade Foundation Transparency Standard and its associated documents, including the Assurance Manual, are under the responsibility of the Aid by Trade Foundation and managed by ATAKORA Fördergesellschaft GmbH. Readers shall use the latest copy of this (and other related documents). Any discrepancies between copies, versions, or translations shall be resolved by reference to the definitive version of the requirements maintained on the websites of the Aid by Trade Foundation ([Home - Aid by Trade Foundation](#)), Cotton made in Africa® ([Home | Cotton made in Africa | CmiA](#)), and the Regenerative Cotton Standard® ([Regenerative Cotton Standard](#)).

Version number	Issue date	Amendments
Transparency Standard Version 1.0	2025-06	Initial release

Standard Effective Date

This document is effective as of 2025-06-01 with a transition period ending 2026-02-28. The explanations and regulations in the Chain of Custody Guideline on HIP implementation will cease to apply on 2026-02-28. From 2026-03-01, this standard will be mandatory for all stakeholders involved in CmiA HIP/RCS implementation.

Next Review

The Aid by Trade Foundation Transparency Standard is reviewed at least every five years. The next review is expected in 2030.

Disclaimer

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Translation Accuracy

The official language of this document is English. In case of any inconsistency between versions in different languages, please refer to the English version. While translations to other languages will be provided, the Aid by Trade Foundation assumes no liability for errors or misunderstandings due to translation.

Any Questions or Concerns?

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1 How to Use this Document

The goals of the Aid by Trade Foundation Transparency Standard (AbTF Transparency Standard) are to ensure the accuracy of claims made about the implementation of cotton that has been verified in accordance with the latest version of the Cotton made in Africa® (CmiA) standard¹, Cotton made in Africa Organic Standard (CmiA Organic)² or the Regenerative Cotton Standard® (RCS) standard³ and to allow retailers and brands to communicate correctly about them.

CmiA- or RCS-verified raw material is tracked through the supply chain, up to and including retailers' and brands' CmiA- or RCS-claimed products. The AbTF Transparency Standard is designed to safeguard the integrity of these materials at every stage.

The AbTF Transparency Standard provides the following:

- A foundation for using CmiA- or RCS-verified raw material under the **Hard Identity Preserved (HIP)** implementation system
- A tool for retailers and brands to reliably build consumer trust through credible claims
- A way for supply chain organisations to verify business-to-business claims

The AbTF Transparency Standard is owned by the Aid by Trade Foundation and managed by ATAKORA Fördergesellschaft GmbH.

Key definitions and terms used in this document are listed below.

1.1 Definitions and Methodology

Term	Definition
Aid by Trade Foundation (AbTF)	The Aid by Trade Foundation is the owner of the CmiA and RCS raw material standards as well as of the AbTF Transparency Standard.
Aid by Trade Foundation Transparency Standard (AbTF Transparency Standard)	The AbTF Transparency Standard sets out requirements for organisations in the supply chain that are buying or selling CmiA- or RCS-verified cotton, cotton-containing products (e.g. yarns, fabrics or garments) or cotton by-products such as comber noils, treated and produced according to the Hard Identity Preserved (HIP) implementation system.
ATAKORA Fördergesellschaft GmbH (ATAKORA)	The global marketing of the Aid by Trade Foundation's brand rights is carried out by ATAKORA Fördergesellschaft GmbH, which manages licensing and partnership agreements with various stakeholders in the textile value chain.

¹ https://cottonmadeinafrica.org/wp-content/uploads/CMIA_Standard_ENG.pdf

² https://cottonmadeinafrica.org/wp-content/uploads/CmiA-Organic_Compl-Requirements-CmiA-Vol4_V1_EN.pdf. For ease of reading, references to CmiA cotton in this document encompass CmiA Organic cotton as well.

³ https://regenerative-cotton.org/wp-content/uploads/Regenerative_Cotton_Standard_0.0-2.pdf

Term	Definition
Chain of Custody (CoC)	This system documents and verifies the path taken by a defined input material through all stages of transfer and production, up to and including the final product. The chain of custody preserves the identity of the input material.
CmiA cotton	This term includes cotton produced by CmiA-verified cotton companies and their associated small-scale farmers in accordance with the CmiA standard. For ease of reading, the term “CmiA” in this document encompasses CmiA Organic as well.
CmiA or RCS Cotton Producer (Managing Entity)	This is another term for a CmiA- or RCS-verified Managing Entity that adheres respectively to the CmiA, CmiA Organic or the RCS standards. A Managing Entity is responsible for management and production activities and must be able to demonstrate that everyone working in or with its' CmiA or RCS unit operates according to the requirements of the CmiA or RCS standards. A Managing Entity is the CmiA or RCS certificate holder.
CmiA- or RCS-nominated cotton trader	CmiA- or RCS-nominated cotton traders have signed a contract with ATAKORA that enables them to purchase CmiA/RCS cotton from a CmiA/RCS-verified cotton producer and to sell the cotton under the CmiA/RCS claim to an CmiA HIP- or RCS-registered spinning mill or another CmiA-/RCS-nominated cotton trader.
CmiA Organic cotton	CmiA Organic must both meet the requirements of the CmiA standard and hold a certification under the IFOAM Family of Standards for organic cotton cultivation at the farm level (e.g. EU Organic Regulation No 834/2007 or the USDA National Organic Program (NOP)). For ease of reading, the term “CmiA” in this document encompasses CmiA Organic as well.
CmiA HIP- or RCS-claimed product	Any cotton or cotton-containing product (after the cotton trader level) that is bought or sold under a CmiA HIP or RCS claim. In this document this can refer to yarns, fabrics, garments or combers noils.
CmiA HIP- or RCS-registered spinning mill	CmiA HIP-registered or RCS-registered spinning mills are allowed to purchase CmiA or RCS cotton, to process it into yarns, and sell these yarns as CmiA HIP-/RCS-claimed yarns.
CmiA HIP- or RCS-registered yarn trader	CmiA HIP-registered yarn traders or RCS-registered yarn traders are allowed to purchase CmiA HIP-/RCS-claimed yarns and sell these yarns as CmiA HIP-/RCS-claimed yarns.
CmiA HIP- or RCS-registered yarn dye house	CmiA HIP-registered yarn dye houses or RCS-registered yarn dye houses are allowed to purchase CmiA HIP-/RCS-claimed yarns, treat them and sell these yarns as CmiA HIP-/RCS-claimed yarns.

Term	Definition
CmiA HIP- or RCS-registered fabric producer	CmiA HIP-registered or RCS-registered fabric producers are allowed to purchase CmiA HIP-/RCS-claimed yarns, process them into fabrics and sell the fabrics as CmiA HIP-/RCS-claimed fabrics.
CmiA HIP- or RCS-registered fabric trader	CmiA HIP-registered fabric traders or RCS-registered fabric traders are allowed to purchase CmiA HIP-/RCS-claimed fabrics and sell these fabrics as CmiA HIP-/RCS-claimed fabrics.
CmiA HIP- or RCS-registered fabric dye house	CmiA HIP-registered fabric dye houses or RCS-registered fabric dye houses are allowed to purchase CmiA HIP-/RCS-claimed fabrics, treat them and to sell these fabrics as CmiA HIP-/RCS-claimed fabrics.
CmiA HIP- or RCS-registered garment producer	CmiA HIP-registered garment producer or RCS-registered garment producer are allowed to purchase CmiA HIP-/RCS-claimed yarns or fabrics, process them into garments and sell these garments as CmiA HIP-/RCS-claimed garments.
CmiA HIP- or RCS-registered comber producer or comber trader	CmiA HIP-registered comber producer/comber trader or RCS-registered comber producer/comber trader are allowed to purchase CmiA/RCS cotton or CmiA HIP-/RCS-claimed comber noils, treat or process then and sell these comber noils as CmiA HIP-/RCS-claimed comber noils.
Combers/noils	These short fibres are removed during the cotton-combing process in textile manufacturing, making them cotton by-products. They are used in textile production both as an input (e.g. for yarn production) and as an output (e.g. wastage during yarn production).
Conventional cotton	This refers to any cotton that was not produced under AbTF's cotton standards, which are Cotton made in Africa®, Cotton made in Africa Organic, and the Regenerative Cotton Standard®. Under this definition, conventional cotton can include organic cotton or cotton certified under other sustainability standards.
Control Body	A control body is an independent organisation responsible for verifying compliance with the AbTF Transparency Standard and its regulations. It conducts audits, assessments, and inspections to ensure adherence to the established criteria.
Cotton made in Africa Standard® (CmiA)	The Cotton made in Africa® (CmiA) standard is a voluntary standard by AbTF which covers the most significant sustainability aspects of cotton cultivation and ginning. The CmiA standard applies to Managing Entities – usually cotton companies with one or more ginning facilities – operating in Africa South of the Sahara with a direct link to small-scale farmers. A Managing Entity must be able to demonstrate that its CmiA unit operates according to the requirements of the CmiA standard.
Hard Identity Preserved (HIP)	The Hard Identity Preserved (HIP) system is a content claim system. Within this system, it is not allowed to mix CmiA/RCS cotton with any

Term	Definition
	other cotton at any stage of production. Blending or mixing with other organic or recycled cotton verified under a different standard (e.g. the Organic Content Standard or the Recycled Claim Standard) is only possible under some conditions (see chapter 6.3).
Importer, Exporter, Vendor, or Garment Trader	Importers, assigned by retailers for CmiA or RCS orders, do not need to register with CmiA or RCS; however, they can only access AbTF's tracking systems. When selling CmiA/RCS garments or textiles to a CmiA/RCS licensing partner (retailer/brand), they are allowed to purchase CmiA- or RCS-claimed finished products from ready-made garment producers.
Outsourcing	This refers to the process of sending claimed material to a subcontractor for services to be rendered.
RCS cotton	This is cotton produced by RCS-verified Managing Entities and their associated small-scale farmers in accordance with the RCS standard.
Regenerative Cotton Standard ® (RCS)	The Regenerative Cotton Standard ® (RCS) is a voluntary standard developed by AbTF for cotton produced through regenerative farming methods. An RCS Managing Entity must be able to demonstrate that its RCS unit operates according to the requirements of the RCS standard. To avoid any confusion with other standards (such as the Recycled Claim Standard) it is recommended to clearly state "Regenerative Cotton Standard" on all relevant documents.
Retailer or brand	A retailer is a person or business that sells goods to the public for use or consumption rather than for resale (i.e. business-to-consumer or B2C). In this context, the term "brand" meets the same definition.
Sub-contractor	This is a legal entity hired by an organisation to perform services (e.g. storage or processing) on a claimed material. Subcontractors take physical possession but not legal ownership of claimed materials and are independent of the organisation which outsources the material.
Supply chain organisation	This term refers to a legal entity registered with CmiA or RCS according to the applicable registration guidelines. A supply chain organisation treats, trades, or sources CmiA/RCS cotton or CmiA/RCS-claimed materials or products (e.g. comber noils, yarns, fabrics, or garments), operating out of one or more business locations. For ease of reading, this document also refers to supply chain organisations as simply an "organisation".
Tracking system or Sustainable Cotton Tracker (SCOT)	AbTF provides tracking systems to track the volumes of procured CmiA or RCS cotton throughout the supply chains. Their use is mandatory for all members of the CmiA/RCS supply chain who are producing ⁴ or trading CmiA/RCS cotton or CmiA-/RCS-claimed products (e.g. comber

⁴ For cotton-producing entities (CmiA/RCS cotton producers), use of the tracking systems will be mandatory from 2026 onwards.

Term	Definition
	noils, yarns, fabrics, or garments). Apart from its own systems (e.g. SCOT), AbTF may use approved systems of external service providers.
Volume reconciliation	This is the process of documenting quantities of material purchased, present on-site, and sold for a particular supply chain organisation and of reviewing these quantities for accuracy and consistency.

1.2 Verbal Forms for the Expression of Provisions⁵

In this document the following terms are used to indicate requirements, recommendations, permissions, and possibilities or capabilities:

Verbal Form	Meaning
shall or shall not	These verbal forms are used to indicate requirements that must be strictly followed in order to conform to the document and from which no deviation is permitted.
should or should not	These verbal forms are used to indicate that, among several possibilities, one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required, or that (in the negative form) a certain possibility or course of action is deprecated but not prohibited.
may or may not	These verbal forms are used to indicate a course of action permissible (or, in the negative form, impermissible) within the scope of the document.
can or cannot	These verbal forms are used for statements of possibility and capability, whether material, physical, or causal.

1.3 Legal Compliance

The AbTF Transparency Standard, the Assurance Manual, and other standard-related documents do not address product quality or legal compliance criteria. Organisations adhering to the standard are expected to comply with all relevant local, national, and international laws and regulations and are responsible for ensuring their own legal compliance.

⁵ See “ISO/IEC Directives Part 2: Rules for the structure and drafting of International Standards” https://boss.cen.eu/media/yypj13mn/iso_iec_directives_part2.pdf. Copyright 2011 by ISO/IEC.

It is expected that no organisation registered with CmiA or RCS violate fundamental human rights as afforded by customary international law. Should such practices come to the attention of the Aid by Trade Foundation or ATAKORA, they have the authority to exclude the offending organisations from current and future registration.

1.4 Reference Documents

Document	Link
Assurance Manual for the AbTF Transparency Standard	https://cottonmadeinafrica.org/wp-content/uploads/Assurance-Manual_AbTF-Transparency-Standard_Version1_6.2025.pdf
Cotton made in Africa ® standard	https://cottonmadeinafrica.org/wp-content/uploads/CMIA_Standard_ENG.pdf
Cotton made in Africa Organic	https://cottonmadeinafrica.org/wp-content/uploads/CmiA-Organic_Compl-Requirements-CmiA-Vol4_V1_EN.pdf
Regenerative Cotton Standard ® standard	https://regenerative-cotton.org/wp-content/uploads/Regenerative_Cotton_Standard_0.0-2.pdf
CmiA Registration Guidelines	https://cottonmadeinafrica.org/en/become-a-partner/
RCS Registration Guidelines	To be published
Cotton Trader Partnership Guideline	To be published
CmiA Chain of Custody Guidelines	https://cottonmadeinafrica.org/wp-content/uploads/CmiA-Chain-of-Custody-Guidelines.pdf
CmiA Mass Balance Implementation	https://cottonmadeinafrica.org/wpcontent/uploads/CmiA_MassBalance_Implementation.pdf
SCOT User Manual	https://scot.cottonmadeinafrica.org/help-docs/ctindex
Document for HIP Onboarding audits	https://cottonmadeinafrica.org/wp-content/uploads/Onboarding-Audit-for-HIP-Spinning-Mills.pdf
Document for Self declarations	To be published

2 Introduction

2.1 Cotton made in Africa® and the Regenerative Cotton Standard®

Cotton made in Africa® (CmiA)⁶ and the Regenerative Cotton Standard® (RCS) are two internationally renowned standards for sustainable raw materials. Whereas Cotton made in Africa® has been one of the world's leading standards for sustainably produced and traceable cotton since 2005, focussing on small-scale farming in Africa South of the Sahara, the Regenerative Cotton Standard® was established only recently, in 2023, with the objective of improving the overall resilience of farming communities while adding value to farmland, rural communities, the biosphere, and the quality of life of farm animals.

CmiA and RCS are owned and implemented by the Aid by Trade Foundation (AbTF), an internationally recognised non-profit organisation transforming fibre and textile production through its cotton and cashmere sustainability standards. Following a value-to-business approach, AbTF's goal is to accelerate nature restoration and socioeconomic justice for farming communities by activating market forces and investing in innovative farming as well as supply chain tools. The foundation works with a wide-ranging network of partners in cotton-growing and textile production countries as well as with experts from governmental and non-governmental organisations and the private sector.

ATAKORA Fördergesellschaft GmbH (ATAKORA) is responsible for the marketing and supply chain management of AbTF standards. It acts as the contracting partner at each level of the supply chain. By maintaining licensing contracts with several international retail and brand partners, the Aid by Trade Foundation and its marketing company, ATAKORA, are working to increase demand for CmiA- and RCS-verified cotton.

The Aid by Trade Foundation Transparency Standard is the key framework that connects Cotton Producers — verified in accordance with the latest version of the CmiA standard⁷ or the RCS standard⁸ — with retailers or brands demanding sustainably grown cotton with a traceable supply chain. The AbTF Transparency Standard sets out monitorable requirements for organisations in the supply chain that are buying or selling CmiA- or RCS-verified cotton, cotton-containing products (e.g. yarns, fabrics, or garments), or cotton by-products such as comber noils that were treated and produced according to the Hard Identity Preserved (HIP) implementation system.

Supply chain organisations and retailers/brands can make the respective HIP claims for eligible products if they adhere to the requirements of the AbTF Transparency Standard and the Claims Framework for CmiA or RCS, as applicable.

2.2 Scope

The AbTF Transparency Standard defines the requirements for all supply chain organisations that produce, trade, treat, buy, or sell any products that contain CmiA or RCS cotton (e.g. cotton, comber noils, yarns, fabrics, or garments/textiles) and that are processed under the Hard Identity Preserved (HIP) implementation system.

⁶ For ease of reading, the term "CmiA" in this document encompasses CmiA Organic as well.

⁷ <https://cottonmadeinafrica.org/en/principles-and-criteria/>

⁸ <https://regenerative-cotton.org/en/home/>

The requirements of the AbTF Transparency Standard must be applied at each site owned by the organisation which falls under the CmiA HIP/RCS registration, and which wants to sell CmiA HIP-/RCS-claimed products.

The following sections shall apply to all organisations, unless the requirement specifies otherwise:

Entity	Relevant sections
Cotton Producers	<ul style="list-style-type: none"> • Partnership requirements (Chapter 4) • Management requirements (Chapter 5) • Processing requirements (Chapter 6) • Transactions (Chapter 7)
Cotton trader	<ul style="list-style-type: none"> • Partnership requirements (Chapter 4) • Management requirements (Chapter 5) • Processing requirements (Chapter 6) • Transactions (Chapter 7)
Other supply chain organisations	<ul style="list-style-type: none"> • Chain of Custody supply chain model (Chapter 3) • Partnership requirements (Chapter 4) • Management requirements (Chapter 5) • Processing requirements (Chapter 6) • Transactions (Chapter 7)
Retailers and brands	<ul style="list-style-type: none"> • Requirements for brands (Chapter 8)

For ease of reading, the term “CmiA” in this document encompasses CmiA Organic as well.

2.3 Tracking Systems

It is mandatory for Cotton Producers⁹, cotton traders, retailers, brands, and producers and suppliers of comber noils, yarns, fabrics, or garments to document their CmiA- or RCS-claimed purchases and sales through tracking systems owned or acknowledged by the Aid by Trade Foundation or ATAKORA. For more detail, please refer to [chapter 7](#).

⁹ For cotton-producing entities (CmiA/RCS cotton producers), use of the tracking systems will be mandatory from 2026 onwards.

3 Chain of Custody Model

Depending on expectations for transparency and traceability, different systems for implementing verified cotton in a retailer’s supply chain are applicable. The Hard Identity Preserved (HIP) implementation system offers full transparency and traceability throughout the supply chain, meaning that the CmiA- or RCS-verified cotton can be traced from the retail order back to the CmiA- or RCS-verified cotton producer. Under the Mass Balance (MB) implementation system, verified cotton can be mixed or substituted with any other cotton so that only limited information about the cotton supply chain is available.

Cotton made in Africa® cotton can be implemented under either system: Hard Identity Preserved or Mass Balance¹⁰. For cotton verified according to the Regenerative Cotton Standard® or to the CmiA Organic standard, the Hard Identity Preserved implementation system is mandatory.

Retailers, brands, and their supply chains are advised to adopt the Chain of Custody (CoC) models that best align with their business requirements, operational environments, and legal regulations. At every supply chain stage, organisations must apply all relevant CoC models at the site level, ensuring that CoC requirements and data are maintained at each site for all applicable models. **The AbTF Transparency Standard establishes the basic rules for the Hard Identity Preserved (HIP) implementation system.**

3.1 Hard Identity Preserved (HIP) Implementation for CmiA and RCS

Under the HIP implementation system, CmiA or RCS cotton and RCS/CmiA HIP materials and products (comber noils, yarns, fabrics, garments) must be segregated at all stages of the supply chain (from cotton producer to retailer/brand).

The following requirements **also apply for the implementation of CmiA/RCS Organic cotton¹¹.**

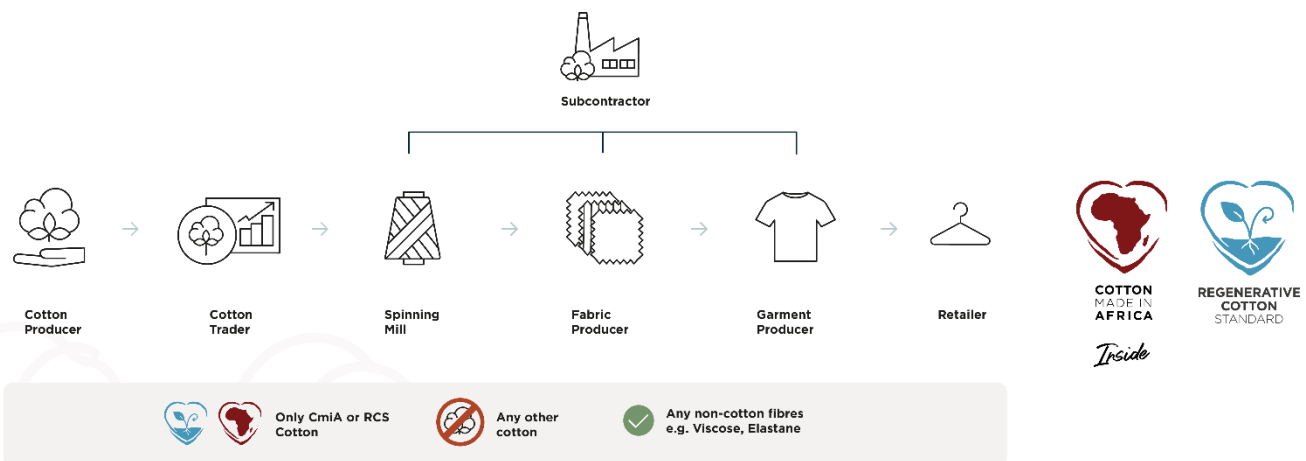


Figure 1: The HIP system throughout the supply chain¹²



¹⁰ See “Guidelines for Mass Balance (MB) Implementation”

(https://cottonmadeinafrica.org/wp-content/uploads/CmiA_MassBalance_Implementation.pdf). Copyright 2023 by CmiA.


¹¹ Cotton that is verified under CmiA or RCS and that is also verified under an organic standard of the IFOAM Family of Standards for organic cotton cultivation at the farm level (e.g. EU Organic Regulation No 834/2007 or the USDA National Organic Program (NOP))

¹² This is a simplified graphic of the textile supply chain. All intermediate levels, e.g. yarn/fabric trader or dye houses, are also in scope of the AbTF Transparency Standard and must fulfil all relevant regulations.

Segregation at the Cotton Producer Level (From Raw/Seed Cotton to Lint Cotton)

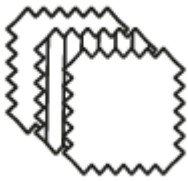
Entity	Segregation rules
 <p>Cotton Producer (Cotton farmer and ginnery)</p>	<ul style="list-style-type: none"> • CmiA or RCS cotton and non-CmiA/RCS cotton must be kept segregated during all stages of harvest, storage, and processing at the farm and of transportation between cotton farmers and Cotton Producers, including at the ginnery, as well as from Cotton Producers to spinning mills. • Physical traceability from CmiA- or RCS-verified cotton producers to CmiA- or RCS-registered spinning mills is mandatory. • No blending of or substitution between CmiA or RCS cotton and non-CmiA/RCS cotton is permitted at the level of the Cotton Producer, including at the ginnery.
 <p>Cotton trader</p>	<ul style="list-style-type: none"> • Sales of CmiA or RCS cotton must comprise exclusively cotton from CmiA or RCS farmers (produced in compliance with the latest version of the Cotton made in Africa® Standard or Regenerative Cotton Standard®). • Accompanying sales and transport documents must clearly identify (e.g. with bale numbers or lot numbers) the corresponding bales as CmiA- or RCS-verified cotton bales. To avoid any confusion with other standards (e.g. the Recycled Claims Standard), it is recommended to clearly state “Regenerative Cotton Standard” on all relevant documents.

Segregation at the Supply Chain Organisation Level (From Lint Cotton to Final Product)

Entity	Segregation rules
 <p>Spinning mills</p>	<ul style="list-style-type: none"> • CmiA or RCS cotton and non-CmiA/RCS cotton must be kept segregated at all stages of storage, processing, treatment, and inter-facility transportation. Segregation may be physical (e.g. separate storage areas and production lines) or temporal (e.g. separate production runs, one after the other). • CmiA or RCS cotton must be clearly marked at all stages of storage, processing, treatment, and inter-facility transportation (e.g. with signage). Accompanying sales and transport documents must clearly identify (e.g. with bale numbers or lot numbers) the corresponding bales as CmiA- or RCS-verified cotton bales. To avoid any confusion with other standards (e.g. the Recycled Claims Standard), it is recommended to clearly state “Regenerative Cotton Standard” on all relevant documents. • The substitution of CmiA or RCS cotton with non-CmiA/RCS cotton is prohibited; blending CmiA or RCS cotton with non-CmiA/RCS cotton is only allowed under the regulations outlined in chapter 6.3.

Entity	Segregation rules
--------	-------------------

and



Fabric producer


and



Garment producer

and

- However, CmiA or RCS cotton can be blended with other, non-cotton fibres.
- CmiA HIP-/RCS-claimed yarns and other yarns must be kept segregated at all stages of storage, processing, treatment and inter-facility transportation. Segregation may be physical (e.g. separate storage areas and production lines) or temporal (e.g. separate production runs one after the other).
 - CmiA HIP-/RCS-claimed yarns must be clearly marked at all stages of storage, inter-facility transportation, and processing (e.g. with signage).
 - The substitution of CmiA HIP-/RCS-claimed yarns with other yarns is prohibited; mixing of CmiA HIP-/RCS-claimed yarns with other cotton yarns is only allowed under the regulations outlined in chapter 6.3. However, CmiA HIP-/RCS-claimed yarns can be mixed with other, non-cotton yarns.
 - CmiA HIP-/RCS-claimed fabrics and other fabrics must be kept segregated at all stages of storage, processing, treatment and inter-facility transportation. Segregation may be physical (e.g. separate storage areas or production lines) or temporal (e.g. separate production runs one after the other).
 - CmiA HIP-/RCS-claimed fabrics must be clearly marked at all stages of storage, inter-facility transportation, and processing (e.g. with signage).
 - The substitution of CmiA HIP-/RCS-claimed fabrics with other fabrics is prohibited; mixing of CmiA HIP-/RCS-claimed fabrics with other cotton fabrics is only allowed under the regulations outlined in Chapter 6.3. However, CmiA HIP-/RCS-claimed fabrics can be mixed with other, non-cotton fabrics.
 - CmiA HIP-/RCS-claimed garments and other garments must be kept segregated at all stages of storage, processing, treatment and inter-facility transportation. Segregation may be physical (e.g. separate storage areas and production lines) or temporal (e.g. separate production runs, one after the other).
 - CmiA HIP-/RCS-claimed garments must be clearly marked at all stages of storage, inter-facility transportation, and processing (e.g. with signage).
 - Substitution of CmiA HIP-/RCS-claimed garments with other garments is prohibited.
 - CmiA HIP-/RCS-claimed comber noils and other comber noils must be kept segregated at all stages of storage, processing, treatment and inter-facility transportation. Segregation may be physical (e.g. separate storage areas and production lines) or temporal (e.g. separate production runs one after the other).
 - CmiA HIP-/RCS-claimed comber noils must be clearly marked at all stages of storage, inter-facility transportation, and processing (e.g. with signage).

Entity	Segregation rules
 <p>All subcontractor and intermediate levels (yarn/fabric/garment trader, yarn/fabric dye house)</p>	<ul style="list-style-type: none"> The substitution of CmiA HIP-/RCS-claimed comber noils with other comber noils is prohibited; blending of CmiA HIP-/RCS-claimed comber noils with other comber noils is only allowed under the regulations outlined in chapter 6.3. Accompanying production reports as well as, sales and transport documents must clearly identify (e.g. with bale numbers or lot numbers) the corresponding products or materials as CmiA HIP-/RCS-claimed products or materials. To avoid any confusion with other standards (e.g. the Recycled Claims Standard) it is recommended to clearly state “Regenerative Cotton Standard” on all relevant documents.

3.2 Other Chain of Custody Models

The Mass Balance system is only applicable for CmiA cotton; CmiA Organic cotton and RCS cotton can be only processed under the HIP system (chapter 3.1). CoC requirements for Mass Balance implementation are outlined in the Chain of Custody Guidelines for Mass Balance implementation¹³.

4 Partnership Requirements

4.1 Cotton Producer (Managing Entity)

Only Cotton Producers or Managing Entities verified under the latest version of the Cotton made in Africa ® standard¹⁴ or the Regenerative Cotton Standard ® standard¹⁵ and holding a valid CmiA or RCS certificate are allowed to sell CmiA or RCS verified cotton.

4.2 Cotton Trader

To be allowed to trade cotton verified under the CmiA or RCS standards cotton traders must have a valid partnership agreement with ATAKORA.

Partnership requirements are outlined in the Cotton Trader Partnership Guidelines.

¹³ See “Guidelines for Mass Balance (MB) Implementation” (https://cottonmadeinafrica.org/wp-content/uploads/CmiA_MassBalance_Implementation.pdf). Copyright 2023 by CmiA.

¹⁴ https://cottonmadeinafrica.org/wp-content/uploads/CMIA_Standard_ENG.pdf or https://cottonmadeinafrica.org/wp-content/uploads/CmiA-Organic_Compl-Requirements-CmiA-Vol4_V1_EN.pdf

¹⁵ https://regenerative-cotton.org/wp-content/uploads/Regenerative_Cotton_Standard_0.0-2.pdf

4.3 Supply Chain Organisations

All organisations producing, treating, trading, or sourcing CmiA or RCS cotton or CmiA-/RCS-claimed products (e.g. comber noils, yarns, fabrics, or garments) are required to maintain a partnership with CmiA or RCS, as applicable. Requirements are outlined in the CmiA Registration Guidelines and the RCS Registration Guidelines.

Organisations with multiple processing and production levels (e.g. producing both yarn and fabric) must register each supply chain unit with CmiA or RCS. An organisation may define the scope of its registration to exclude processes and products that do not comply with the AbTF Transparency Standard or registration requirements; however, excluded processes and products must not be associated with CmiA or RCS claims. Independent companies within the same group must register individually with CmiA or RCS.

Retailers or brands that manage their own manufacturing activities might also need to register in accordance with the applicable registration requirements.

To ensure that purchases of CmiA HIP-/RCS-claimed products and materials are made under a verified claim, it is always the duty and responsibility of the purchasing entity to check whether the selling entity is registered with CmiA or RCS, as applicable.

4.4 Exclusion of Companies

The Aid by Trade Foundation and ATAORA reserve the right to protect and safeguard themselves against risks to their integrity and credibility. CmiA or RCS registration applications can therefore be denied if a company poses a reputational risk to the Aid by Trade Foundation or ATAORA through past or present actions. These include but are not limited to child labour, health and safety violations, or being listed on an internationally recognised default list or ban list, e.g. the International Cotton Association's List of Unfulfilled Awards Part 1 or List of Unfulfilled Awards Part 2 (see <https://ica-ltd.org/safe-trading/list-of-unfulfilled-awards>) or the UFLPA Entity List of the U.S. Department of Homeland Security (see <https://www.dhs.gov/uflpa-entity-list>).

5 Management Requirements

The organisation has sufficient management practices and systems in place to ensure that CmiA HIP-/RCS-claimed products are maintained and processed in accordance with the AbTF Transparency Standard throughout the organisation and that audits can be conducted effectively.

5.1 General Management System

The organisation shall maintain a management system to ensure the full implementation of all applicable criteria of the AbTF Transparency Standard. Documented procedures or work instructions addressing all of the standard's relevant criteria must be established, implemented, and maintained. The organisation shall appoint one or more representatives who are responsible for ensuring compliance with the relevant CoC requirements and for recording relevant data in the respective tracking systems. The organisation must confirm that these representatives are trained and competent to fulfil the AbTF Transparency Standard's requirements.

The organisation shall grant the appointed control bodies access to complete, up-to-date, and accurate information as well as to their operations in order to demonstrate compliance with the AbTF Transparency Standard. Access shall, at minimum, include the following:

- **Physical site access.** All relevant areas of the organisation's processing sites shall be fully accessible.
- **Document and record access.** All documents and records pertaining to compliance with the AbTF Transparency Standard, potentially including financial records, shall be provided.
- **Unrestricted personnel interviews.** Auditors shall have the freedom to interview personnel without restrictions or observation by management representatives.
- **Access to subcontractors.** Equivalent access shall be provided to all associated sites and subcontractors involved in the organisation's processing activities.

The organisation shall regularly assess risks of non-compliance with the AbTF Transparency Standard, document any findings, and implement corrective actions as needed.

5.2 Training

The organisation must establish and clearly communicate defined roles and responsibilities for all personnel involved in activities that impact the implementation of the AbTF Transparency Standard. All staff responsible for procedures related to the AbTF Transparency Standard shall receive appropriate and regular training on its implementation, with documented training records being maintained.

5.3 Record Keeping

All organisations must accurately document their process for procuring, processing, treating, selling, and transporting CmiA or RCS cotton as well as CmiA HIP-/RCS-claimed products or materials (e.g. comber noils, yarns, fabrics, or garments). Each organisation shall maintain complete, up-to-date, easily auditable, and comprehensible records to demonstrate compliance with all criteria of the AbTF Transparency Standard. These records must align with the scope of the organisation's CmiA/RCS partnership. Records for all CmiA HIP-/RCS-claimed products shall include, at minimum, the following:

- Purchase records (see [chapter 6.2](#))
- Stock records (for raw material and finished goods; see [chapter 6.2.3](#))
- Production records (for input and output; see [chapter 6.3](#))
- Sales and delivery records (see [chapter 6.5](#))
- Stock reconciliation records (see [chapter 5.4](#))
- Outsourcing records (for input and output; see [chapter 6.6](#))

For materials and products moving from one site to another within the same organisation (i.e. covered under the same CmiA/RCS registration), there shall be corresponding records with information about the initial input or product and about the quantity, quality, and blend and mix percentage, sufficient to identify the corresponding incoming transaction and to enable further transparent and traceable processes and transactions (see [chapter 6.5](#)).

All records used for CmiA HIP/RCS production and the implementation of the AbTF Transparency Standard shall be retained by the organisation for a minimum of three (3) years.

5.4 Volume Reconciliation

The organisation shall maintain a system to always control and quantify volumes of CmiA HIP-/RCS-claimed product inputs and outputs, ensuring that the organisation does not sell more materials or products under a CmiA HIP or RCS claim than can be produced based on the available CmiA HIP or RCS inputs.

The organisation shall ensure that volumes reported through the respective tracking system correspond to the reconciled volumes.

Organisations producing, treating, processing, or trading CmiA or RCS cotton or CmiA HIP-/RCS-claimed products shall regularly record the actual production input and output volumes of all physical CmiA/RCS cotton and CmiA HIP-/RCS-claimed products and shall conduct an ongoing volume reconciliation per lot or batch to balance the quantities of each CmiA HIP-/RCS-claimed product purchased, stocked, or sold.

The organisation shall review the volume reconciliation regularly, at least annually, to ensure that all information is correct. The regular and annual volume reconciliations shall include:

- **Physical inventory.** Taking a physical inventory of all CmiA/RCS cotton and CmiA HIP-/RCS-claimed products held in stock, including of inputs, materials in the production process, and outputs.
- **Waste factor comparison and waste usage.** Comparing actual waste factors with expected waste factors and assessing how the waste is being managed, reused, or disposed of.
- **Outsourced products.** Monitoring and verifying the compliance of outsourced production processes with the AbTF Transparency Standard's requirements.
- **Products sold without claims.** Reviewing products that contain CmiA or RCS cotton and that were sold without any CmiA HIP/RCS claims.
- **Conversion of products.** Taking into account the conversion of CmiA HIP products to CmiA Mass Balance products (see [chapter 7.2](#)).
- **Record maintenance.** Keeping detailed records of the reviewed volumes.

Deviations of more than five (5) percent from the expected volumes shall be investigated and communicated to AbTF and ATAORA for volume correction in the respective tracking system.

To ensure traceability, prevent fraudulent practices, and align with possibly evolving standard requirements, inventory resulting from input purchases or production processes older than two (2) years will no longer be eligible to be processed or sold as CmiA HIP-/RCS claimed products.

5.5 Managing Non-Conforming Products

The organisation shall ensure that a mechanism is in place for handling non-conforming materials and products to ensure that they are not processed or sold onwards under a CmiA HIP or RCS claim until their status can be verified. This includes any transfers of CmiA HIP or RCS volumes in the respective tracking systems.

If the materials or products of questioned or unconfirmed conformity have already been processed and sold, the organisation must inform their customer within seven (7) calendar days. Until conformity is reliably demonstrated, the product must be considered as having been sold without the claim.

When a non-conforming product is identified, the organisation must immediately separate any products that do not meet the required standards from those that comply, ensuring that the former are not accidentally sold or distributed. A thorough investigation should be conducted to determine the cause of the non-conformance, followed by the implementation of corrective actions to address the issue and prevent it from recurring. Additionally, preventive actions should be put in place to ensure that future non-conformities are avoided.

6 Processing Requirements

The organisation handles CmiA HIP and RCS inputs, materials, and products in a way that conforms the integrity of the claimed material with respect to the AbTF Transparency Standard. The organisation must maintain full traceability for its products, from material purchases to product sales, as required (see [chapter 3.1](#)).

6.1 General

The organisation must hold a valid CmiA/RCS partnership (see [chapter 4](#)) at all times when materials or products are produced, processed, treated, traded, or sourced under a CmiA or RCS claim. Without a valid partnership, materials cannot be sold under the respective claim.

If there are any doubts about the conformity of the received materials or products (e.g. cotton, comber noils, yarns, fabrics, or garments) with the AbTF Transparency Standard (see [chapter 6.2](#)), the processing shall not begin until conformity has been demonstrated. In such cases, the buyer of any claimed materials or products shall contact the producer/seller to inspect the relevant documentation (e.g. production reports and material receipts) to verify the origin and nature of the materials or products. During this time, the corresponding volume transactions should not be processed in the tracking systems.

6.2 Material Purchase and Storage

6.2.1 General

Organisations must ensure compliance with all applicable requirements for the purchase, storage, and handling of CmiA or RCS cotton and CmiA HIP-/RCS-claimed materials and products. To maintain the integrity of claims, the process must guarantee the materials' traceability and accurate documentation as well as the segregation of claimed materials from non-claimed materials.

Supply chain organisations must purchase CmiA or RCS cotton and CmiA HIP-/RCS-claimed material or products (e.g. comber noils, yarns, fabrics, or garments) only from CmiA- or RCS-registered organisations (see [chapter 4](#)). Updates on the status of CmiA- or RCS-verified Cotton Producers, CmiA-/RCS-nominated cotton traders, and CmiA-/RCS-registered organisations must be regularly checked.

Organisations must accurately document their processes for procuring CmiA or RCS cotton or CmiA HIP-/RCS-claimed materials and products, including the flow of these materials (along with any intermediaries). For purchases of CmiA or RCS cotton or CmiA HIP-/RCS-claimed materials or products (e.g. comber noils, yarns, fabrics, or garments), the supplier shall provide the organisation with documents containing the following information:

- The organisation's name and address as the buyer of the material.
- The name and address of the supplier of the material.
- A product description or specification.
- In the case of CmiA: the applicable CoC implementation model HIP (only applicable for comber noils, yarns, fabrics, garments, not for cotton).
- A unique product identification or reference code/number (e.g. lot number).
- A unique contract/sales reference number.
- The volume or quantity of materials.
- The date of delivery or shipping.
- Transport or shipping information.

Accompanying purchase and transport documents must clearly identify (e.g. with bale numbers or lot numbers) the corresponding products or materials as CmiA HIP-/RCS-claimed products or materials. To avoid any confusion with other standards (e.g. the Recycled Claims Standard) it is recommended to clearly state "Regenerative Cotton Standard" on all relevant documents.

All documents and records related to the purchase of claimed materials must be retained for a minimum period of three (3) years.

The organisation receiving CmiA or RCS cotton or CmiA HIP-/RCS-claimed materials or products shall inspect the accompanying documents to confirm that the description, quantity, quality, source, and blend and mix percentage described in the document match the products received. Organisations shall implement a system to ensure all records related to the purchase and sale of CmiA or RCS cotton or CmiA HIP-/RCS-claimed products (e.g. cotton, comber noils, yarns, fabrics, or garments) are complete, accurate, and properly maintained.

Organisations buying CmiA materials or products (e.g. comber noils, yarns, fabrics, garments) should confirm with their seller whether CmiA MB products or CmiA HIP products are purchased and that purchase transactions are correctly entered into the applicable systems' MB or HIP section in the tracking systems.

6.2.2 Purchases of CmiA or RCS Cotton

Only cotton from CmiA or RCS-contracted farmers can be sold as such by the Cotton Producer.

Nominated cotton traders must purchase CmiA or RCS cotton only from CmiA or RCS-verified Cotton Producers, or other nominated cotton traders. Updates on the status of verified cotton producers or other nominated cotton traders must be regularly checked.

If CmiA or RCS cotton is purchased from another nominated cotton trader, it must be ensured that it is CmiA/RCS cotton from a CmiA/RCS-verified Cotton Producer.

For purchases and sales scheduled for after the expiry date of a Cotton Producer's current CmiA/RCS certification, AbTF and ATAKORA cannot guarantee the future availability of a valid CmiA/RCS certificate for the Cotton Producer in question.

6.2.3 Material Storage

Organisations shall ensure that the identification of CmiA or RCS cotton and CmiA HIP/RCS-claimed material or products is maintained during storage and during all stages of production and handling. The organisation shall implement one of the following segregation methods:

- **Physical segregation of materials and products:** It is to be ensured that different materials (claimed and non-claimed) are kept physically apart throughout processing and storage.
- **Temporal segregation of materials:** This involves processing different materials (claimed and non-claimed) at different times one after the other to prevent unintentional mixing or blending.

Additionally, CmiA or RCS cotton and CmiA HIP-/RCS-claimed materials and products shall be clearly identified by labelling or marking materials to clearly distinguish between CmiA- or RCS-verified cotton and non-verified cotton as well as between CmiA HIP-/RCS-claimed materials or products and non-claimed or products.

CmiA or RCS cotton and CmiA HIP-/RCS-claimed materials and products shall be clearly identified, at all times, as they move through production. This may include but is not limited to:

- **Direct labelling:** Marking claimed materials and products clearly to distinguish them from non-claimed materials.
- **Machine identification:** Labelling machines that process claimed materials to prevent unintentional mixing or blending
- **Storage vessel marking:** Clearly designating storage vessels for claimed materials.
- **Dedicated storage areas:** Separating claimed materials in distinct storage areas to maintain traceability.

Accompanying storage documents must clearly identify (e.g. with bale number or lot numbers) the corresponding products or materials as CmiA HIP-/RCS-claimed products or materials. To avoid any confusion with other standards (e.g. the Recycled Claims Standard) it is recommended to clearly state “Regenerative Cotton Standard” on all relevant documents.

Claimed materials shall be always separated from non-claimed materials, except as allowed by the regulations outlined in [chapter 6.3](#). Strict procedures shall be implemented to avoid the commingling or substitution of claimed materials with other materials or products. Extra precautions shall be applied when claimed and non-claimed materials of the same type are shipped, stored, or processed together, to ensure that no accidental commingling or substitution occurs.

When processing CmiA Organic cotton or products, the requirements of the applicable organic standard must be met to prevent the loss of organic certification. Compliance with the organic regulations is not checked by the AbTF Transparency Standard; this is done independently and in accordance with the regulations and processes applicable to the organic standard used. However, the corresponding documentation must be stored in the tracking system.

6.3 Material Processing

The organisation must establish and maintain a system to apply the HIP implementation requirements (see [chapter 5](#)). This system must include measures for the processing of physical materials claimed under the Hard Identity Preserved (HIP) model (see [chapter 3.1](#)) that ensure the proper segregation and controlled blending of these materials.

The organisation shall demonstrate robust control over the flow, segregation, and identification of claimed materials within the site. This includes managing recipes used, material composition, material quality, and stock quantities.

Prior to processing claimed materials, all machinery shall be free of non-claimed material. Any contamination that could impact the accuracy of volume reconciliation must be prevented. If not addressed, this could lead to contamination, which may cause a deviation in volume reconciliation.

Mixing or Blending With Non-cotton Fibres

Blending and mixing of CmiA or RCS cotton or CmiA HIP-/RCS-claimed materials and products with non-cotton fibres or materials is allowed. However, in order to label the final product with the CmiA HIP or RCS logo, the cotton content of the product must be at least five (5) percent. Products containing less than five (5) percent cotton (e.g. 96 percent non-cotton fibres like elastane) are not eligible for CmiA or RCS labelling.

Mixing or Blending With Other Cotton Fibres (Not Applicable for Cotton Producers or Cotton Traders)

From the spinning stage onwards, blending with different certified materials (e.g. cotton, comber noils, yarns, or fabrics) from separate sustainability (organic or recycled) programmes — such as 50 percent CmiA and 50 percent OCS — is permitted. However, claims for each material shall remain distinct and be clearly communicated.

When blending or mixing claimed materials with other certified cotton materials, or when using different claimed materials with varying claimed content percentages (e.g. CmiA and RCS), the organisation shall prepare composition calculations. These calculations must include the following:

- Documentation of all input materials used in the final product or specific component that contains blended or mixed materials
- Calculation of the percentage of claimed content and the percentage for each raw material, based on the weight and claim percentage of each input

For more details, please refer to the applicable Claims Frameworks and Logo Manuals.

6.4 Material Sales and Transportation

For every sale and delivery of CmiA or RCS cotton and CmiA HIP-/RCS-claimed materials or products (comber noils, yarns, fabrics, garments), the organisation shall provide the customer with documents, (e.g. sales invoices, delivery/shipment documents, and outward weigh slips). These documents must include the following information:

- The customer's name and address as the buyer of the material.
- The organisation's name as the supplier of the material.
- A product description or specification.
- In the case of CmiA: the applicable CoC implementation model (this does not apply for Cotton Producers and cotton traders).
- A unique product identification or reference code/number (e.g. lot number).
- The product volume or quantity
- The date of shipping.
- Sales invoices and contracts.
- Transport or shipping information.

The organisation shall ensure that CmiA or RCS cotton and CmiA HIP-/RCS-claimed materials and products are transported to other units, including importers and retailers, only in appropriate packaging, containers, or vehicles and in such a way that substitution or mixing of the content are not possible without tampering or damage to the container.

Accompanying sales or transportation documents must clearly identify (e.g. with bale numbers or lot numbers) the corresponding products or materials as CmiA HIP-/RCS-claimed products or

materials. To avoid any confusion with other standards (e.g. the Recycled Claims Standard) it is recommended to clearly state “Regenerative Cotton Standard” on all relevant documents.

The organisation shall enter the relevant sales information for all materials or products sold with reference to the CmiA or RCS standards in the respective tracking systems (see [chapter 5](#)).

6.5 Vertical Integration

For CmiA or RCS cotton and CmiA HIP-/RCS-claimed materials and products (e.g. comber noils, yarns, fabrics, or garments) transferred between sites within the same organisation (meaning it is vertically integrated, e.g. containing both a yarn and a fabric unit), the corresponding records must be maintained. These records must include details on the following:

- The initial materials,
- The quantity, quality, blend and mix percentage,
- The description of the materials received.

Each material transfer must be recorded in the respective tracking system.

6.6 Outsourcing/ Sub-contracting

Organisations may use sub-contractors for the processing of CmiA or RCS cotton or CmiA HIP-/RCS-claimed materials and products. Throughout all stages of outsourcing, the organisation shall maintain legal ownership of the goods and shall ensure that all subcontractors comply with the AbTF Transparency Standard.

The organisation should have an overview of subcontractors at hand and be able to demonstrate how the AbTF Transparency Standard has been communicated to third parties and, where possible, to show where the AbTF CoC requirements have been incorporated in contractual agreements.

The organisation shall maintain an up-to-date list of all subcontractors, including with the following details:

- Name, address, and contact details of each subcontractor
- The outsourced activity being performed
- The frequency of the outsourced activity

Key Requirements for Sub-contractors:

In cases where the organisation engages with subcontractors, the organisation shall make commercially reasonable efforts to ascertain that the subcontractors are reputable and legitimate enterprises and comply with the criteria laid down in this standard. At minimum, the actions the organisation must undertake to fulfil this requirement include the following:

- Provide sufficient information and training to subcontractors on implementation systems, and ensure adherence to the AbTF Transparency Standard
- Assess and mitigate significant risks of non-compliance by subcontractors
- Ensure that the standard's requirements are explicitly included as binding obligations in all subcontractor contracts, maintain evidence of these inclusions, and provide it upon request.

The organisation shall establish a signed agreement with each subcontractor, defining the scope of the outsourced activity and specifying that subcontractors must do the following:

- Commit to all applicable requirements within the scope of the agreement
- Maintain accurate records of all inputs, production processes, and outputs of claimed materials and products, and provide this information to the organisation
- Not outsource the activity further, beyond the scope of the agreement
- Agree to allow full access to their operations in order to enable both second- and third-party assessments within the scope of the agreement to take place, as appropriate

The organisation shall maintain sole responsibility for entering all purchase and sales transactions into the respective tracking system; subcontractors shall not be allowed to gain access to the systems.

7 Transactions

The organisation shall ensure that all purchases, sales transactions, material inputs, and product outputs are promptly and accurately entered into the CmiA or RCS tracking systems, as applicable. To maintain data integrity and compliance with the tracking requirements, it shall also establish procedures to regularly review and verify the correctness of these entries.

7.1 General

It is the responsibility of the organisation to ensure that all relevant sites are correctly listed in the respective tracking system.

All organisations must enter all CmiA/RCS material sales transactions into the applicable tracking system within 30 calendar days of the shipment date. Only CmiA cotton sales can be entered before the shipment date, as the purchased volume might be used for CmiA Mass Balance transactions.

CmiA/RCS material sales (e.g. cotton, comber noils, yarns, fabrics, or garments) must be reported in the respective tracking system by the selling organisation. These entries will also be displayed in the buying organisation's account to allow for acknowledgment by the buyer.

Selling organisations must ensure that all data entered into the tracking system is accurate and can be verified against corresponding documentation such as purchase receipts, invoices, and production records. Only materials and products that fulfil the CoC implementation requirements of this standard and are adequately documented in the respective tracking system shall be considered as having been sold under a CmiA/RCS claim.

Detailed information about data input and the usage of the tracking systems can be found in the corresponding user manual.

7.2 Converting Between CoC Implementation Systems (Only Applicable for CmiA)

Organisations may be allowed to convert CmiA HIP products to CmiA Mass Balance products. Downgrading is permitted at all supply chain levels (from spinning mill to garment supplier), provided that all affected supply chain actors involved are registered with CmiA and authorised for Mass Balance production. However, this conversion is **irreversible and final**.

Once downgraded, a product can no longer carry any CmiA HIP claims or on-product communications. All downgraded volumes must be properly documented and traceable in the tracking system. Documentation supporting the downgrade (e.g. data entries or delivery notes) must be retained for audit purposes. Large-scale downgrades should be communicated to the Aid by Trade Foundation and ATAKORA in advance.

7.3 No Double Claiming of Transaction Volumes

The organisation shall ensure that CmiA/RCS volumes are not claimed under both CmiA/RCS and other certification or sustainability programme. CmiA or RCS cotton that is also certified under another sustainability programme may only be sold under a single claim and in accordance with the applicable standard and guidelines.

8 Requirements for Retailers and Brands

8.1 Responsibilities

Retailers and brands must sign a licensing agreement with ATAKORA. This agreement allows them to incorporate the CmiA or RCS cotton into its supply chain and to use the CmiA or RCS logo and label for product communication and corporate communication in accordance with the CmiA or RCS Claims Frameworks, as applicable.

They are responsible for

- informing their relevant supply chain partners about the applicable Chain of Custody (Coc) implementation requirements;
- ensuring that all relevant supply chain partners comply with the AbTF Transparency Standard;
- monitoring documentation and data in the tracking systems to confirm the traceability and integrity of claimed materials; and
- ensuring accurate product labelling and marketing, avoiding any misleading claims (see [chapter 8.2](#)).

When selling CmiA HIP-/RCS-claimed products to another business (B2B), the following information must be included on each relevant document (e.g., invoice or supplementary sales document):

- A clear indication of and information on the applicable standard and CoC implementation system

- If the brand's customer is not the final retailer (e.g. a wholesaler), the information shall be included on a supplementary sales document that is intended to be passed along to the final seller and that specifies this information.

In cases where a CmiA HIP-/RCS-claimed product is resold by a retailer or brand that is not the original licensee (e.g. another retailer or intermediary), a separate licensing agreement is not required. However, the reseller must ensure that

- the supplying retailer or brand holds a valid licensing agreement with ATAKORA;
- the product was produced and tracked in accordance with the applicable requirements of the AbTF Transparency Standard; and
- no changes have been made to the product or labelling that would alter or misrepresent the original claim.

The reseller must exercise appropriate due diligence and request evidence (e.g. supplier declaration or supplementary documentation) to verify that the product meets the requirements before communicating the claim through its own channels.

8.2 Claims

Retailers and brands must ensure that only garments and textiles:

- which meet all implementation requirements outlined in this standard; and
- which are traceable through the applicable tracking system are sold under the CmiA HIP or RCS claim.

All product claims and labels must comply with the applicable Claims Frameworks and Logo Manuals, regardless of who conducts the final sale.

Retailers and brands must implement and consistently apply controls to ensure accurate use of CmiA and RCS claims and logos — particularly when similar products are purchased under different CoC models (see [chapter 3](#)).

If there are doubts about the validity of a claim associated with a product, the organisation shall contact the Aid by Trade Foundation or ATAKORA.

9 Monitoring and Sanctions

9.1 For Supply Chain Organisations

If an organisation cannot prove the source of traded, treated, or processed materials and products under the CmiA HIP/RCS claim, fails to prove that claimed materials were processed correctly and in accordance with the requirements of the AbTF Transparency Standard, or provides fraudulent information or data, the Aid by Trade Foundation and ATAKORA reserve the right to take corrective actions. These actions may include commissioning audits, cancelling account volumes, suspending the organisation, or terminating the partnership entirely.

Sanction and escalation procedures in the event of non-compliance are outlined in the Assurance Manual¹⁶.

¹⁶ https://cottonmadeinafrica.org/wp-content/uploads/Assurance-Manual_AbTF-Transparency-Standard_Version1.6.2025.pdf

Without a valid CmiA/RCS partnership (see [chapter 4](#)), an organisation is no longer allowed to produce or sell any CmiA/RCS-claimed materials or products.

9.2 For Retailers and Brands

Without a valid licensing agreement (direct or via purchase from a licensed partner), neither product labelling nor corporate communication is allowed, and the use of a CmiA/RCS logo is prohibited in any kind of communication or marketing.

If an unauthorised CmiA/RCS logo is not removed from all communications within the specified timeline, the Aid by Trade Foundation or ATAKORA will publish an official statement about this misuse. For further information, please refer to the CmiA Claims Framework and the RCS Claims Framework.

Sanction and escalation procedures in the event of non-compliance are outlined in the Assurance Manual¹⁷.

10 Complaints Mechanism

The Aid by Trade Foundation and ATAKORA Fördergesellschaft GmbH have established a concerns and complaints mechanism that enables any individual or organisation to express dissatisfaction, including with the actions, procedures, or decisions of a supply chain organisation¹⁸.

If you have any other complaints, please reach out to complaints@abt-foundation.org.

11 Contact

General information on Cotton made in Africa and the Regenerative Cotton Standard can be found on the Aid by Trade Foundation's websites at the following addresses:

<https://cottonmadeinafrica.org/en/>

<https://regenerative-cotton.org/en/home/>

For further information please reach out to: supplychain@abt-foundation.org

¹⁷ https://cottonmadeinafrica.org/wp-content/uploads/Assurance-Manual_AbTF-Transparency-Standard_Version1_6.2025.pdf

¹⁸ <https://cottonmadeinafrica.org/en/questions-complaints/>