KS1758 HORTICULTURE INDUSTRY — CODE OF PRACTICE PART 2: FRUITS AND VEGETABLES

FARM REFERENCE NO:		ENENGAI OIL REFINERIES LTD-AVOCADO	DATE/S:	26-28/10/2022
AUDITORS:	1	ROWLAND GAKUO (AFFA-HCD Auditor Approval No`s ROAC118-1372022(RG)	2	NONE
	3	NONE	4	NONE

Introduction.

KS 1758-2:2016 was prepared by the Horticultural Fresh Produce Technical Committee under the guidance of the Standards Projects Committee, and it is in accordance with the procedures of the Kenya Bureau of Standards. It stipulates the hygienic and safety requirements during the production, handling and marketing of Fruits, vegetables, herbs and spices. The standard also considers the safety provisions for consumers and workers in the industry. The recommendations made in the standard target production and marketing of quality horticultural fresh produce under appropriate environmental conditions

The purpose of the audit is to analyze the performance of the farm with regards to KS 1758 Part 2 _2016. To that effect, an audit will be performed according to the criteria described in the present plan.

The activities of a certification audit will include as a minimum:

- Initial meeting
- · Review of documentation and implementation
- Evidence gathering and observation of practices
- Farm visit and review of farming activities including Produce handling Unit
- Packhouse and Cold Chain Management
- Interviews
- Final meeting

Client's Name: Menengai Oil Refinery Limited -Avocado

Unit

13.05.2022

Certification Contact: Thomas Simiyu.RSPO, ISO MR &

Continual Improvement Lead

Standard/ Scope: KS 1758 Part 2_2016 **Type of Audit:** Certification audit

Date when audit request was created

on AFFA-HCD Portal:

Date of Audit 26-28/10/2022

Farm LocationRongai, Nakuru CountyProductsAvocado fruits

Category Single Unit Production and Packing

Any Parallel Production No

SIGNED		
Rowland Gakuo	Del	Auditor
Thomas Simiyu		Management Representative

Summary of Nonconformities				
No of Non compliances				
Legal and Regulatory issues	0			
Major Non-Compliances	0			
Minor Non-Compliances	3			

Page one of this checklist provides the instruction to the auditors

COMPLIANCE VERIFICATION AND COMMENTS

- 1. Verification for compliance is recorded in the audit checklist in the following ways.
 - a. Yes
 - **b.** No
 - c. N/A
 - **d.** Comments.
- **2.** The checklist must be marked within the following guidelines:
 - a. A tick (V) on the "Yes" column of the checklist indicates 100% compliance.
 - b. A tick (V) on the "No" column of the checklist indicates partial compliance or 100% non-compliance.
 - c. N/A in the "No' column indicates that the clause of the standard is not applicable to the operator.
 - **d.** Evidence (comments) is provided for each clause in the checklist for all audits, and inspections both internal and external by the operator and by the Certification Body respectively. This enables the audit trail to be reviewed after the event and include the details of the references noted during the inspection.
 - **e.** The above comments or evidences e.g. of documents sampled, workers interviewed, shall be site and product specific, and included in the checklist to give confidence that all the control points have been assessed for all sites and products.
 - **f.** Any Clause in the standard categorized as "A" indicates a *major must* requirement. 100% compliance of all applicable Major must control points is compulsory.
 - **g.** Any clause in the standard categorized as "B" indicates a *minor must* requirement. 95% compliance of all applicable Minor Must control points is compulsory
 - h. Any Clause in the standard categorized as "C" indicates a recommendation and is encouraged but not mandatory

	FARM MANAGEMENT RESPONSIBILITIES AND DOCUMENTATION	Yes	No	Comments
4.1A	Ultimate responsibility for compliance with the code of practice rests with the owners or board of directors of each	Yes		The organization had
	growing or exporting company.			documented in the
				integrated Farm assurance
				Quality Manual signed by
				the Site General Manager
				ref
				MOARL/AGRIC/MAN/001
				dated 24-01-2022 that
				ascribes to that the
				General Manager has the
				day to day overall
				responsibility and reports
				to the Head of Agriculture
				in the Group level and the
				directors on a dotted line.
				The Board of directors are
				fully responsible for the overall implementation of
				the compliance to the
				code. The board is kept
				informed of any
				undertakings in line with
				the industry and have
				membership to the
				Avocado society of Kenya
				M-1011 valid till 31-12-
				2022
				. A written statement
				signed by the Chairman
				has been annexed to the
				integrated farm
				management system that
				indicates that the farm
				is committed to
				complying with KS
				1758
				All legal and regulatory
				requirements were
				verified having been

			complied to
4.2A	The operator shall be responsible for the day to day management and implementation of the code of practice and the health and safety of all personnel keep a check on the observance of the labour and safety regulations and evaluate suggestions for improvements and complaints.	Yes	Reviewed general code of commitment on health and safety, Labour,Site Security, Environment ref MORL-AGRIC-POL-12 dated October 2022 with relevant commitments in form of policies. Some of the appropriate policies include. 1. Health and Safety guideline, policy and procedures 2. P.P.E Use policy ref MORL-AGRIC-002 3. Hygiene Policy and Procedures ref MORL-AGRIC-POL-003 4. Return to work Policy and Procedure ref MORL-AGRIC-POL-994 5. Agricultural Chemical use Policy and
			Procedures ref MORL-AGRIC- POL-005 6. Environmental policy and procedures ref MORL-AGRIC- POL-006 7. Fire Safety Policy and Procedures

		POL-007
	Q	Food Safety
	0.	Declaration ref
		MORL-AGRIC-
		POL-008
	9.	Health and
		Safety Guidelines
		ref MORL-AGRIC- POL-009
	10	
	10.	Waste
		Management
		Policy and
		Procedure ref
		MORL-AGRIC-
	4.	POL-010
	11.	GMO Declaration
		policy ref MORL-
		AGRIC-011
	12.	General Policies
		information's ref
		PORL-AGRIC-
		POL-012
	13.	Accidents and
		Emergencies ref
		MORL-AGRIC-
		POL-015
	14.	MORL-IMS-POL-
		0002 Hygiene
		Codes of
		practices
	15.	MORL-AGRIC-PO-
		016 Agricultural
		pest and Disease
		Control Protocol
		and Orocedures
) Job descriptions
		een given to all
	_	nel and reviewed
		s such as
		tion supervisor
	who ho	lds the role of

4.3A	The operator shall demonstrate a commitment to continual improvement of standards in social responsibility	Yes	ensuring that the farm is kept safe by checking and ensuring all personnel are kitted up with the required P.P.E and that farm operations are safe The organization has
	towards all categories of workers.		ensured continual improvement through provision of adequate resources in line with the standard, Policies have been adequately documented in relation to social compliance and Social responsibility with declaration on social good practices touching on Child Labour,Forced Labour,Inhumane treatment ,Freedom of Association, Discrimination and Harassment, Health and Safety, wage and hours of work, medical all detailed in the Social Farm Code ref MORL/AGRIC/MAN/004 dated 30th October 2021 signed by the head of Agriculture who holds the senior most position in the avocado project and also signed by the worker representative Mr Raphael Mwakiteli dated 30-10-2021
4.4A	The operator shall periodically review its policies and practices in social responsibility towards all categories of workers and out-growers	Yes	Policies in relation to social responsibility for all

			the workers are reviewed at least annually with the latest review done 04 October 2022
4.5A	The operator shall demonstrate a commitment to investigating non-compliance and to taking corrective action where necessary. Resources shall be allocated to this purpose as necessary and shall take measures to ensure that workers and out-growers who raise concerns about non-compliances are not discriminated against.	Yes	Complaint policy and procedure Ver 1.0 dated 04-01-2022 prepared by Farm Manager and Authorized by the G.M Non-Conforming handling and Corrective action procedure dated 03.01.2022
4.6A	The operator shall provide access to third parties carrying out external verification of compliance to the requirements of this code of practice	Yes	All documents were accessible and available to external auditors
4.7A	The operator shall make a commitment to employee and out-grower training to ensure that all persons are able to work in accordance with this code of practice.	Yes	All employees are trained and all training opportunities are fair to all. No out growers
4.8A	The operator shall liaise with its customers to ensure compliance with specific customer policies regarding workers welfare, out-grower relationships, environmental protection and food safety.	Yes	Specific customer requirements are shared with the organization ad used in ensuring that the food products fulfil all the requirements
4.9A	The operator shall develop an environmental management plan to cover all aspects of both positive and negative aspects of agricultural and social activities. This is a requirement under the Environmental Management and Coordination Act, 1999.	Yes	Documented Environment Policy signed dated January 2022 by the Group Managing Director that shows the company commitment to ensure sustainable environment for all stake holders. Documented environmental management plan that describes on environmental rehabilitation and waste

			manag	gement.
4.10	Input procurement			
4.10.1A	Procurement of inputs used in production, processing and packaging shall comply with legislative requirements and customer specifications. Procurement policy for seeds, propagation material, pesticides, cleaning and disinfecting agents, post-harvest treatments etc., shall be understood and implemented by all staff involved in the procurement process. Procurement shall be done from registered suppliers only.	Yes	procul compa propa were i from a propa	emicals are red from registered anied by PCPB.All gation materials reviewed sourced accredited gators as detailed in report
4.10.2A	Where used, Genetically Modified Organisms (GMOs) shall be in accordance with the Biosafety Act and the prevailing regulations.	Yes	policy organi AGRIC policy Octob Declai propa GMP I	itment in form of a done by the ization ref MORL-POL-011 GMO signed dated 03-er 2022. Tation that the gation material are free were reviewed the from the gators
5.1	Traceability			
5.1.1A	The operator shall put in place a traceability system by way of designing, implementing and monitoring a detailed process flow that addresses raw material procurement, production process and conditions; by products generated; waste treatment; risk assessments; human resources; equipment employed; governing standards and regulations.	Yes	tracea Versio 04.01. AGRIC dictate	nented site bility procedure in 1 dated 2022 ref MORL- FORM 005 that es on how bility system is in
			All blo	cks are visually

identified using a numerical number and the same number is a replica of the production blocks in the Menengai Farm Block Mapping. A total of 18 blocks from Block 1 to Block 18 have been identified in the map with the area,the variety of avocado plants within the block,total population of plants and the date of planting as well as how irrigation water distribution is within the farm Soil Mapping has been done on the entire farm identifying the types of soils within a block/cropping areas and its identified based on soil profile and local carographic soil type map. Tests relating to each identified block on soil analysis done annually by Crop Nuts with the following reports reviewed and actions implemented from the analysis 1. Block 1 Report #CM171SA0121 dated 17th September 2022 by Crop Nuts Laboratory

	2. Block 2 Report
	#CM171SA0122
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	3. Block 3 Report
	#CM171SA0123
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	4. Block 4 Report #CM171SA0124
	#CM1715A0124 dated 17th
	September 2022
	=
	by Crop Nuts
	Laboratory
	5. Block 5 Report
	#CM171SA0125
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	6. Block 6 Report
	#CM171SA0126
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	7. Block 7 Report
	#CM171SA0127
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	8. Block 8 Report
	#CM171SA0128
	dated 17th
	September 2022
	by Crop Nuts

	Laboratory
	9. Block 9 Report
	#CM171SA0129
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	10. Block 10 Report
	#CM171SA0130
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	11. Block 11 Report
	#CM171SA0131
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	12. Block 12 Report
	#CM171SA0132
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	13. Block 13 Report
	#CM171SA0133
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	14. Block 14 Report
	#CM171SA0134
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	15. Block 15 Report
	#CM171SA0135
	dated 17th
	September 2022

	by Crop Nuts
	Laboratory
	16. Block 16 Report
	#CM171SA0136
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	17. Block 18 Report
	#CM171SA0137
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	18. Block 18 Report
	#CM171SA0138
	dated 17th
	September 2022
	by Crop Nuts
	Laboratory
	Corrective action Plan
	done by the Agronomist
I	Soil Correction summary
	reports for September ref
	MORL/AGRIC/FORM/033
	reviewed e.g 01 st
	October soil correction by
	Lilian Nyambura done
	with spray of copper
	suplhate recommended
	on block 1 which was
	identified to be deficient
	of
	phosphorous, Calcium, sul
	phur,manganese and
	Boron
	Produce harvested are
	labelled with traceability
	stickers from a particular

			block are loaded into crates and identified on crates with a common traceability sticker with dates of harvest, block reference/numbers, Produce name and Variety and also recorded on the delivery note together with quantities of dispatched products and vehicles details Intake records detail on date of the produce receiving>QC Check %>Block Number>Variety>Time of receipt. The final product is labelled on boxes detailing on Product, Lot Number, Box Number.
5.1.2A	Traceability shall ensure that the consumer is informed correctly on produce specifications, origin and usage, while stimulating all stakeholders to act with respect to each other i.e. good corporate practice.	Yes	Th boxes labelled `Raicado` details on the variety of the avocado either Hass or Fuerte,Storage Condition as store at temperatures below 5°c,Net weight 4kgs and Avocado Count,Barcode,Associatio n Logo and Produced and Packed by Menengai Oil The box indicates the produce as produce for export only.No internal packs for each avocado

5.1.5.A	 i. All growers, traders and processors shall be responsible for the safety of the produce and products. ii. All farm produce shall be labeled at source based on guidelines provided in this code iii. All food products shall be labeled in accordance with East African standards, EAS38: 2000 advertising and presentation must not mislead consumers. iv. All food products shall have a code indicating the Country code, farm location and block number and other parameters indicated in the national traceability system. v. Food produce traders and processors must be able to identify the businesses from whom they obtained and the businesses they have supplied with food produce and products. vi. Unsafe food produce and products must be withdrawn from sale or distribution chain or recalled from consumers if already sold. vii. The requirement for withdrawal or recall applies to all stages of production, processing and distribution of food produce and products. viiii. Processors, traders, importer and exporter shall keep records from whom food produce is sourced and to whom is sold for a period not less than six months and in consideration of the nature of the food and its shelf life. ix. Food produce or products which are considered unsafe for human health shall not be presented for sale exported or imported. The food produce or products must comply with the relevant requirements of national food law. x. The operator shall be responsible for withdrawing or recalling food produce from the market. They must also notify the relevant competent authority and collaborate with the authority (i.e.) on any action they should take to avoid or reduce the risk posed by the food. xi. Where the operator has reason to believe the food produce has reached the consumer, the operator processor must inform the consumer effectively and accurately of the reason for withdrawal of the produce and product. 	yes	All produce is inspected and subjected to analysis before packing for sale. The grower is full responsible for growing, farm management, harvesting and post-harvest handling including packing and dispatch.
5.2	Produce inspection		
5.2	Every unit of produce shall be clearly and indelibly marked from source (farm) to the point of sale such that the identification marks are not altered, adulterated or obliterated.	Yes	Every intake of the material to the pachouse is inspected and recorded in intake and process inspection form ref MORL/AGRIC/FORM/057 with several sampled batches of intake dated 26-07-2022,30-07-2022 sampled and recorded the source(Block number) the Vehicle number that delivered the produce, food safety checks of the

5.3	Produce receipt		material including any disease or deformation noted, any chemical deposit, any foreign body, any live Pest, arrival condition and arrival temperatures from the field,
3.3	The operator shall have in place a detailed and precise process flow that ensures that every unit or batch of the	Yes	Al material handling from
	produce received is clearly marked to enable the produce to be clearly traced from receipt through the handling process to dispatch point.	103	the farm have a traceability tag that identify the source point
6	Record keeping and internal audit		
6.1A	Documentation		
	Records and documentation to be kept by the operator in addition to those required by the laws of the land shall include: a) crop diary showing seed quality, rooting rate, variety name, batch number, planting dates, germination dates, date of harvest and other records related to the plant life cycle; b) agrochemical stock record; c) a list of personnel who have access to pesticide stores, those responsible for transport, mixing and handling of pesticides and records of their relevant trainings;	Yes	Inventory of the agrochemicals in place retained on the system with stock inventory reviewed for the dates 01-102-2022 to 15-15-10-20202 and indicates the stock levels of chemicals and fertilizers
	d) a list of all the chemicals used in the farm;		All supplies related to
	e) a list of "Hazardous" and "Highly Hazardous" (WHO Class 1a and 1b) chemicals in use on the farm including source, application and disposal records		Chemicals and fertilizers are accompanied by Safety data sheets and
	f) all pesticide applications, time and date, details of chemicals used, active ingredients and toxicology ratings location of the crop, weather conditions, names of spray operators and supervisors, equipment used, dosage rates, crops and reason for use and re-entry intervals to be tabulated		delivery notes that indicate the description of the fertilizer or chemical, quantity.eg
	g) a list of spray operators indicating status, most recent attendance of a spray training course (Form 4) and records of the work rotation program, regular medical checks and blood cholinesterase tests (Form 5);		reviewed the following delivery notes 13-10-2022 Delivery 327
	h) maintenance of the spray supervisor log book to include record of filter cartridge replacement in respiratory protection equipment		Humikal(5kg),Borcazink(2 0 Ltrs),Jovit Jet(20kgs),Agroleaf High
	j) all machinery including spraying machines shall have a log book, showing maintenance regular calibration		P(15kgs),Agro leaf

	checks, dates of service etc. k) a record of daily amount of water consumption, all fertilizer usage, date, type, crop weather conditions (Form 9); l) an accident and incident diary shall record all accidents and emergency incidents such as spillage, poisoning cases, sickness, absence from work, etc and the remedial actions taken. m) Notices shall be posted giving emergency procedures in case of fire, spillages, contamination of humans or animals etc. is a guide on action to be taken; n) a list of first aiders and training given; p) a record of disposal of dilute pesticides, pesticide containers etc and a simple map of the entire disposal sites whether in use or not; q) a record of work contracts for permanent and seasonal workers; r) a record of all the daily roll call for all casual workers; s) a record of all the monetary receipts in accordance with the pay roll and any receipts of payment of kind.		magnesium(15kgs) and Mult N(20 Ltrs) delivery note number 277 from Mambo Wholesalers 27-09-2022 Delivery of Gypsum dated 27-09- 2022.19-09-2022 Delivery of Artea 330EC and Skyway 5ltrs supplied under Delivery note 318106 dated 19-09-2022. Delivery note delivery of Ferrari Gold dated 01-Oct 2022(C,N,Fe,Boron and Nitrogen)
6.2A	Operators shall ensure that employees charged with record keeping are trained to do so accurately and that they are adequately supervised.	Yes	Operators of chemicals have been trained on safe use of pesticides with the following training records reviewed. 1. Training on agrochemicals use dated 24 th January 2022 with 27 trained by Samuel Mwakiret 2. Training on safe and effective use of agrochemicals done by Kenagro with certificates reviewed dated 19-11-2021

6.3A	Records shall be clearly written, dated and signed by a responsible person.	Yes	Records were verified clearly written and dated as well as signed by the responsible person including; 1. Davis Lous the farm Manager or Raphael and Lilian The assistant farm managers
6.4A	Recording of data showing non-compliance with standards shall be followed up with a written account of interventions.	Yes	No non compliance found
6.5A	All records shall be available for inspection by authorized persons.	Yes	All records are authorized by the farm manager or the Head of agriculture
6.6A	Records shall be not destroyed within the period that the product is in production, storage, distribution, retailed and consumption. Two years shall be the minimum period for holding a record.	Yes	Records relating to every aspect of production were retained for a minimum of two years as detailed out on details on records control in below report
6.7A	The checklist shall be used to conduct a self-audit for this code of practice, which must be documented.	Yes	A self assessment audit had been done by T Simiyu with corrective actions in place and were reviewed appropriate
6.8A	The grower shall undertake a minimum of one audit per year which shall be documented.	Yes	A self audit had been done on 30 th Sept as detailed in below report
6.9A	All the corrective actions generated from the self-audit must be documented and acted upon.	Yes	All corrective actions had been done
7	Varieties and rootstocks		
7.1.1A	The operator shall procure registered varieties, rootstocks and seed stocks from licensed sources for purpose of traceability	Yes	Varieties (Hass and Fuertes) varieties of avocado grown in the farm, and all are sourced from licensed propagators in the

 	_ _
	country with records
	reviewed of the sourcing
	as sampled and detailed
	below and for imports the
	declarations including
	phytosanitary
	requirements compliance
	by KEPHIS through the
	Phyto sanitary certificates
	reviewed
	1. Plant Import
	Permit by KEPHIS
	dated 02-03-
	2021 ref 411645
	2. Import
	declaration form
	ref
	21NBOM000197
	8592 by Customs
	Department and
	an Import
	release order
	date 09 th March
	2021 ref
	0715358/CS/IMP
	/21 for Avocado
	Plants from
	Willis in Israel,
	Green Fingers
	Nursery To
	Menengai Oil
	Packing List of avocado plants
	(845 Fuerte and
	17345(Hass)
	3. Phytosanitary
	Certificate ref
	291081 from
	Israel to Kenya
	number
	291081,and a

			Kenya Pant Health Import permit ref KEPHIS/PIP.0002 223.09 dated 02nd March 2021 Batch 5 Imports declaration and Plant Phytosanitary certificate for import of avocado plants from Green Fingers Ltd Israel 251300,Plant Import permit ref Kephis/PI.P000226778 by Kenya Plant health Inspectorate service dated 01st April 2021 ,Ministry of Agriculture(State of Israel)Phytosanitary certificate number 323694 dated 07th April 2021 KEPHIS Laboratory diagnosis for avocado sourced from Israel dated 18-03-2021
7.1.2A	The planting materials including propagules or seeds shall be certified in accordance with the seeds and plant varieties act Cap 326 and if imported shall be accompanied with a Phytosanitary certificate issued by a competent authority at source, in accordance with the plant protection Act. Cap 324 i	Yes	All materials were accompanied by Phytosanitary certificate
7.1.3A	Where sourced from own farm, the grower must observe the good agricultural practices for the respective crop. The grower shall have a quality control system and a monitoring system for that monitors any visible signs of pest and diseases to guarantee the quality of the nursery stock produced.	Yes	No Own Farm Propagation of Materials
7.1.4A	When pesticides are used, the operator shall keep records indicating the product name, application dates and doses and the justification for use.	Yes	No own farm propagation of materials hence the clause is not applicable
7.1.5A	The planting material shall be aimed at meeting the customers' specifications i.e. for growers who produce nursery stock for sale.	Yes	The farm does not have a propagation unit

7.1.6A	The operator shall have a written agreement with the customers detailing the variety, volumes and quantity specifications	Yes	Written agreement when procuring seedlings were reviewed between the farm and the Isarel BV Propagator
7.1.7A	The accompanying documentation shall show that the nursery stock is fit for the purpose.	Yes	The farm does not have a propagation
7.1.8A	The firm through a senior manager shall provide documentary evidence that the breeders' rights as per the requirements of the International Union of the Protection of new Varieties of plants (UPOV) are observed.	Yes	The farm does not have a propagation
7.1.9A	The propagation materials shall be traceable to the registered/authorized.	Yes	The farm does not have a propagation
7.2	Pest and diseases		1 1 5
7.2.1A	Where alternatives exist the grower shall select varieties which have some level of tolerance or resistance to commercially important pests and diseases.	Yes	Plants used are superior qualities of known root stock and known propagation material from approved international companies and declared pest and disease free by The State of Israel(Ministry fo Agriculture)Plant protection and inspection services such as PPIS cert number 358297
7.3	Seed treatments and dressings		114111561 330237
7.3.1A	Where and when seed treatments are used by the grower, there shall be justifications for their use.	Yes	The plant is not a seed but rather a propagation material which is treated using heat treatment methods at the source and before dispatch and tested to be free from Avocado sunblotch viroid and Phytophthora cryptogenea and all the plant materials are grown on soilless media hence eliminating any soil borne disease from the plant

			materials
7.3.2A	Seed treatments shall only be used to prolong seed storage life or to reduce subsequent application of pesticides after germination.	Yes	N/A
7.3.3A	The products used shall be recorded giving name, active ingredient the target pest and/or diseases, and any other benefit, if stated.	Yes	N/A
7.4	Nursery stock		
7.4.1A	Purchased nursery stock shall be from a certified source and if imported shall be accompanied with a phytosanitary certificate issued by the competent authority at source.	Yes	Varieties (Hass and Fuertes) varieties of avocado grown in the farm, and all are sourced from licensed propagators in the country with records reviewed of the sourcing as sampled and detailed below and for imports the declarations including phytosanitary requirements compliance by KEPHIS through the Phyto sanitary certificates reviewed 1. Plant Import Permit by KEPHIS dated 02-03-2021 ref 411645 2. Import declaration form ref 21NBOM0001978592 by Customs Department and an Import release order date 09th March 2021 ref 0715358/CS/IMP/21 for Avocado Plants from Willis in Israel, Green Fingers Nursery To Menengai Oil Packing List of avocado plants (845 Fuerte and 17345(Hass) 3. Phytosanitary Certificate ref 291081 from Israel to Kenya

			number 291081, and a Kenya Pant Health Import permit ref KEPHIS/PIP.0002223.09 dated 02nd March 2021 Batch 5 Imports declaration and Plant Phytosanitary certificate for import of avocado plants from Green Fingers Ltd Israel 251300, Plant Import permit ref Kephis/PI.P000226778 by Kenya Plant health Inspectorate service dated 01st April 2021 ,Ministry of Agriculture(State of Israel)Phytosanitary certificate number 323694 dated 07th April 2021 KEPHIS Laboratory diagnosis for avocado sourced from Israel dated 18-03-2021 Plant material receipt from the state of Israel
			Plant material receipt from the state of Israel (Phyto -sanitary certificate) ref 654225 dated 24 th March 2020 of 7500 plant materials KEPHIS Plant import permit number KEPHIS/PIP/0000171118 from Green Fingers Ltd-Gaaton Israel
7.4.2A	The management shall ensure that the farm produce complies with the World Trade Organization Sanitary and Phytosanitary Measures (WTO-SPS) agreement and the latest version of the International Plant Protection	Yes	All material comply to local Phytosanitary

	Convention (IPPC).		requirements which were reviewed verified for all imported plants with accompaniment of Phytosanitary certificates originating from Plant protection and inspection services for all the 5 batches of plants received including 2020(Plant Phytosanitary certificate 654225,(2021 ref 358084 by state Department Certificate),2021(ref 358373
7.4.3A	Inspections of plant materials shall be done at all entry and exit points by competent authority and the seed and/or plant material shall be released only if certified to be compliant.	Yes	All plants inspections have been done by KEPHIS which is the government body mandated to clear off all plant materials and approved all the batches as compliant. Approvals done in the Import declaration permits.
7.4.4A	The plants and all propagules shall be free of any visible signs of disease and pests. Whenever there are visible signs of pests and diseases, there shall be a written justification and the corrective action raised. Instructions of quarantine, fumigation or destruction if given by the inspectors shall be complied with.	Yes	No visible pest and diseases. Scouting done
7.4.5A	Suppliers of nursery stock shall give supplier quality guarantees which must be documented.	Yes	Supplier guarantee accompanied all the materials delivered
7.4.6A	The accompanying documentation shall include: Quality certificate, terms of delivery or signed letters.	Yes	All materials included procurement records such as delivery note,GMO Free certificate and phytosanitary certificates
7.4.7A	Operators producing their own seeds shall show proof of seed certification process. Multiplication of seed shall be traceable to breeder's seed in compliance with the Seed Act Cap. 326 of the Laws of Kenya.	Yes	No own seedling production
7.5	Genetically modified organisms (GMOs)		<u> </u>

7.5.1A	Where GMOs are used, their use shall strictly be in compliance with both the local regulations and that of the importing country i.e. countries to which such products are destined i.e. of the final consumer.	Yes	No use of GMO plant in in the farm. No GMO avocado known
7.5.2A	The grower shall have copies of appropriate legislation governing growth and use of GMOs in both the country of production and that of the final consumer.	Yes	No exports done yes, and all the produce was sold locally to other companies. Local National Biosafety Act in place and a Copy of the national Biosafety Act ,Crops Act and retained as soft copy
7.5.3A	Production of GMOs shall be done in agreement indicating total volumes/surfaces with individual customers/consumers prior to planting and which must be in writing and the attendant documentation done.	Yes	No exports done yes, and all the produce was sold locally to other companies. Local National Biosafety Act in place and a Copy of the national Biosafety Act, Crops Act and retained as soft copy
7.5.4A	The grower shall inform all his customers on his own developments relating to the use and or production of products derived from GMOs. Such notifications must be well documented.	Yes	No exports done yes, and all the produce was sold locally to other companies. Local National Biosafety Act in place and a Copy of the national Biosafety Act, Crops Act and retained as soft copy
7.5.5A	GMOs and conventional plant materials shall have separate storage.	Yes	NO GMO onsite
8	Site history and management		
8.1	Site selection		
8.1.1A	Farm plans and activities shall be, drawn and done in accordance with Environmental Impact Assessments (EIA) as per NEMA regulations Crop production areas shall be indicated in relation to staff housing, toilets, drinking water points, waste disposal sites, waste water treatment points, utility stores and social facilities.	Yes	Documented Farm plans in place and done in the year 2019 in accordance with the Environmental Management And Coordination Act 1999 AND Environmental impact assessment and audit regulation ,2003 done by Dr Darius Taruru Lead Expert 035

9.1.24	The records and jurtifications showing the quitability of the site for agricultural activity must be available.	Vas	Soil Maps done for all the 18 blocks detailing on the farm blocks, acreage and total plant polulation, water distribution in the farm, waste disposal site which was one and the farm buildings where the farm had a chemical storage unit and a fertilizer storage unit, Farm bore hole and a dam as well as water distribution system Site selection Risk assessment done to evaluate the suitability of the land for the activity with the latest site selection risk assessment ref MORL/AGRIC/FORM/02 dated last done October 2021 Environmental NEMA approval dated 11th December 2020 ref NEMA/NKR/SPR/5/2/024 6
8.1.2A	The records and justifications showing the suitability of the site for agricultural activity must be available.	Yes	Records of activities including planting records, weeding records, harvest records, packhouse intake records
8.1.3A	Selected site shall not be close to an area contaminated with industrial, domestic, faecal or organic wastes.	Yes	Site Selected is in the village and not around and/or surrounded by any industry, domestic waste line, Waste Disposal site or any

			dumping site. The site is located in Rongai Subcounty of Nakuru County.
8.1.4A	A recording system shall be established for each field, orchard or green house such that each is uniquely identified with a code.	Yes	Each Block is identified using a numerical number from Block 1 to Block 18
8.1.6A	There shall be a farm plan showing the areas covered by each crop and all the agronomic activities in the areas.	Yes	The farm plan details of all the crops and the variety. Monoculture farming practiced
8.1.7B	There shall be unique identification or visual reference system for each production area, sector or greenhouses and farm map prepared.	Yes	Recording of each block activity and harvest details in place
8.1.8B	Records of data showing non-conformity with the quality requirements specified in relevant standards shall be followed up with a written account of corrective measures taken. There shall be a corrective action plan giving strategies on how to deal with identified controllable risks in new agricultural sites.	Yes	No nonconformity was found however the platform of documenting corrective action plans was in place
8.1.9B	The severity and probability of each identified risk shall be indicated as well as the measures to control them.	Yes	Probability determined and were appropriate
8.1.10A	The site shall not be used for agricultural activities when the risk assessments identify non-controllable aspects that are critical to human health and the environment.	Yes	The site risk assessment found that the site was appropriate for farming
8.2	Crop Rotation		
8.2.1B	Where rotations are practiced, there shall be a rotation plan or program, which shall be documented.	Yes	The farm is a monoculture .The crop is perennial crop and undergoes through Mono culture farming methods
8.2.2B	Where rotations are not practiced there shall be a written documented justification for lack of the practice.	Yes	The farm is a monoculture .The crop is perennial crop and undergoes through Mono culture farming methods
8.2.3B	Rotations shall be exempted where crops grown are perennial or where substrates are used.	Yes	The farm is a monoculture .The

			crop is perennial crop and undergoes through Mono culture farming methods.
9.1	Mapping		
9.1.1C	The Operator should prepare soil maps for the entire farm. A soil survey shall be done and a map developed on the basis of the soil profiles and soil analyses.	Yes	Block maps done for all block with the major soil in the blocks being sandyclay soils, Sodic soils and hence addition of gypsum is done and iron to the soil to improve the soils and facilitate absorption and addition of humic materials to improve the soils.
9.1.2C	Planning rotations and growing plans shall be on the basis of the soil maps.	yes	A documented plan is in place and has been done that a new rotation will be done in 20 years as the crop is a fruit tree that matures and survives in years with soil improvement conditions planned including; adding humic materials to supply in nitrogen and improve the soil particles, minimal tillage and addition of gypsum to improve on the chemical constituent of the soils absorbing off all excess Na and Cl ions from the soils Planning of fertilizer is based on the soil analysis done and detailed above in he report with

			norrective actions done to address deficiencies and also address any excess nutrients beyond required limits. The most latest soil analysis had been done in September 2022 by Crop Nutrition Laboratory services .
9.2	Cultivation	Vaa	CAD notice in place not
9.2.1A	A Good agricultural practice (GAP) policy covering all aspects shall be maintained.	Yes	GAP policy in place ref MORAL/PP/GAP/01
9.2.2C	The method of tillage of choice shall be one that preserves soil structure and minimizes soil compaction.	Yes	Minimum tillage practiced
9.2.3C	Use of machinery that minimizes the formation of hard pans is particularly encouraged on the farm.	Yes	No use of farm machine in cultivation
9.3	Soil erosion		
9.3.1A	The operator shall put in place measures and practices that minimize the risk of soil loss from the farm e.g. terracing, cultivation along the contours, use of cover crops etc. i.e. good agricultural practices.	Yes	No farming on banks of rivers or steep terrains. The farm was in a well elevated area which was flat
9.3.3A	There shall be no cultivation on slopes greater than 35 %, along riverbanks, lake shores, or in designated water catchment areas.	Yes	No farming in riverbanks
9.3.4A	Soil drainage systems shall be developed, well-maintained and adequate enough to deal with rainfall and run offs.	Yes	Gabions constructed where appropriate where it was prone to soil erosion
9.4	Soil fumigation		
9.4.1C	Alternatives to the use of fumigants shall be explored before resorting to their use.	Yes	N/A
9.4.2B	Use of fumigants shall be minimized and when used there shall be evidence for use including location, date, active ingredients, doses, method of application, operator name and written justification for their use.	Yes	N/A
9.4.4A	Only chemicals registered by a recognized authority shall be used in any production process. They shall be used in accordance with the prescription for purpose fit for use and will keep up to date with the most current list of acceptable chemicals locally and internationally.	Yes	N/A
9.5	Substrates		
	Operators who use substrates are advised to recycle them and there shall be documentation to show the suitability	Yes	N/A
9.5.1C	of such substrates.		

	substrates are used but not recycled, justification shall be given.		
9.5.3A.	Recycled substrates should be treated/sterilized before re-use. Substrates sterilization shall be done in an environmental friendly way	Yes	N/A
9.5.4A	Where substrates are used, steaming shall be preferred option for sterilization.	Yes	N/A
9.5.5A	Where chemicals are used to sterilize substrate for reuse, the following shall be recorded: location of sterilization, date, type of chemical used, method of sterilization and person performing sterilization.	Yes	N/A
9.5.6.A	There shall be documentation to show the location of the treatment, the method of treatment, dates of sterilization, the active ingredients if any and their application rates, the machinery, the operator etc. particularly where chemicals are used to sterilize.	Yes	N/A
10	Plant nutrition and fertilizer use		
10.1	Advice on quantity and type of fertilizer		
10.1.1A	A written fertilizer plan shall be developed based on soil, water and/or plant analysis which shall be regularly conducted to evaluate the fertilization plan. Chemical fertilizers shall be applied selectively and only on the basis of careful observation of the crop together with soil and, where necessary Organic fertilizers and composted waste shall be used for the improvement of the soil.	Yes	Written fertilizer program ref MORLAGRIC/FORM/043 that details on the fertilizers to be put into different block based on the analysis done showing the deficient minerals in the soil. Much of the soils in the farm is carcacesous sodic soils which are improved by using nitrogen based fertilizer and humics to improve on the infiltration in theto the soil particles Reviewed Fertilizer plan for September 2022 dated 11 th Sept 2022 10.10.2022 approved by Daniel Loius,26-09-2022
10.1.2A	No fertilizer organic or inorganic shall be applied within six meters of any water channel or source.	Yes	N/A
10.1.3A	There shall be no direct drainage to any water source of runoff water from land where fertilizer has been applied.	Yes	No application done close to water sources and a gap of more than 10

10.1.4B	The person in charge of fertilizer application and the operators shall demonstrate understanding on matters relating to fertilizers and fertilizer use.	YES		meters was reviewed left between where the dam is and where the orchard is and there are no runoffs. Grass was seen planted as the block hedge crop that separate blocks and areas including orchard and the The advisor on fertilizer application is trained with a PHD in Plant genetics
10.1.5A	Trained and competent employees shall be responsible for fertilization programme.	YES		and Crop Protection from Hebrew University of Jerusalem Employees are trained with training done by Raphael Mwakireti dated
				08-06-2022 and an initial training dated 19-11-2020 by KENAGRO Chemical and fertilizers-based company
10.1.6A	There shall be proof of that competence and where it is lacking, training shall be given by qualified personnel.	YES		Training relating to the advisor on soil fertility and fertilizer and chemical application related to DR Shery Lev Consultants with PHD in plant Genetics from Hebrew University dated 11 th June 2018
10.1.7A	Inorganic fertilizers used on the farm shall have a fertilizer profile detailing chemical content.		NO	A fertilizer profile detailing on the chemical content of each fertilizer applied Much as the farm had stocked several fertilizers used in Avocado application it was not Cleary demonstrated that

			all the inorganic fertilizers used on the farm had a fertilizer profile detailing chemical content.
10.2	Records of application		
10.2.1B	Records of fertilizer application shall detail the geographical areas, name and reference of the field, greenhouse where the crop is located.	Yes	Records of application of the fertilizers were reviewed detailed in record ref MORLA/GG/FORM/014 Fertilizer application plan and details on the block applied, area applied, the crop(avocado), Variety(Hass or fuerte),Date Planted, Date of application, the fertilizer trade name, component if the fertilizer(Chemical content),Rate of application/HA,Actual application, Application method(Basal or dripline), checked by and verified by. Application for several blocks were reviewed e.g 09-09-2022 Humigreen (Humical Fe) applied on block 1 to Block 18. 03-04-2022 Gold Chance EDDHA _Fe)60 kgs applied on Block 1 to 18 at a rate of 5kg/Ha,Gold Chance N-P-K 21-7-21
10.2.2A	A recording system shall be established for each application of fertilizers: date, type (trade name), quantity, method,	Yes	with 1350kgs applied Recording in place see
	type of machinery used for the application, method of application and the name of the operator of each application		above

	must be recorded.		
10.2.3A	The date of any application of soil/foliar/nutrient solution fertilizers shall be documented (recorded).	Yes	Details include the type of fertilizer applied. See above
10.2.4A	A work instruction for the fertilizer application shall be clearly written and signed by a competent person able to interpret the crop soil analysis. The instruction shall indicate who, when, where and how to apply.	Yes	Work instruction on fertilizer application both basal manual application and via drip line verified in place and the instruction details on who applied, when application should be done and how the said operation should be done. Drenching and calibration of the fertigation unit done by Amiran with the latest 21-10-20221 and the next planned in October 20220 ref 0215 done by Techncian J Kimani
10.2.5.A	Documents of the exact amounts applied shall be signed by a supervising authority.	Yes	Amounts are signed the supervisor and the farm manager
10.3	Application machinery		
10.3,1A	The fertilizer application machinery shall be well maintained and calibrated regularly to ensure accurate delivery.	Yes	Fertigation unit serviced with latest servicing dated 12-06-2022 by Hardi Kenya
10.3.2A	All machinery, including spraying machines, shall have a log book, showing maintenance, regular calibration checks, dates of service.	Yes	Regular checks are done for the fertigation unit with start up reviewed between the dates 06-04-2022 and 15-10-2022 on intermittent dates when application was to

			happen e.g 06-05-2022
10.4	Nutrient requirements		
10.4.1C	A cropping care plan shall be developed to ensure minimum nutrient loss.	Yes	Crop care plan in place
10.4.2C	The grower shall, based on the risk assessments and soil analyses, make a cropping plan and fertilization program that aims at minimizing nutrient loss.	Yes	Cropping and soil impact risk assessment in place
10.4.3B	Plant and soil analysis shall be regularly conducted to evaluate the fertilization plan.	Yes	Soil analysis done by Crop Nutrition Laboratory dated September 2022 with application of fertilizer in October informed by soil analysis done
10.4.4C	The application of fertilizer shall be based on a calculation of the nutrient requirements of the crop and on the appropriate routine analyses of nutrient levels in the soil, the crop or nutrient solution.	Yes	All the application are based on calculated nutrient requirements for the plant and this is done by the advisor after evaluation of the soil analysis
10.4.5C	The fertilizer application shall meet the needs of the crop and maintain fertility and the quantities must comply with the fertilizer crop plan.	Yes	Applications are based on soil fertility and the crop nutritional needs with quantities reviewed complying to the nutrients demand for the crop e.g 09-04-2022,055-05-2022,19-07-2022,22-09-2022 as reviewed in the fertilizer application records
10.5	Timing and frequency		
10.5.1A	The quantity of fertilizer applied shall be calculated to optimize benefits and minimize nutrient losses and shall be based on soil analysis.	Yes	Calculation of fertilizer needs done before application
10.5.2A	The grower shall take into consideration the stage of growth of the crop as well as the weather conditions prevailing at the time of the intended application	Yes	Stage of the crop and nutrient needs factored
10.5.3A	The quantities of the applied nitrogen shall fall within the national limits where they exist and or international limits and such quantities shall be worked out on an annual basis.	Yes	Nitrogen limits did not exceed national limits
10.5.4A	A nitrogen management plan shall be established and nitrogen quantities calculated and applied on the basis of the plan.	Yes	Quantities calculated of each fertilizer and

			nitrogen needs
10.5.5A	There shall be a documented plan that covers the nitrogen analysis at the start and end of each crop or per site in a rotation program.	Yes	Management plan in place
10.5.6C	Growers should understand that establishment of a healthy crop reduces the need for spray and that excessive application of nitrogen can render crops more susceptible to diseases and pests.	Yes	No excessive spray.IPM strategies in place
10.6	Fertilizer storage		
10.6.1	Fertilizer store shall be covered and bunded. The fertilizer shall not be placed directly on the floor The store shall be located away from water source. The store must be rodent-proof	Yes	Fertilizer store was reviewed appropriate and well bunded with all fertilizers stored on pallets
0.6.2A	There shall be a well-managed fertilizer stock inventory indicating the contents of the store, types and amounts. The inventory shall be regularly updated.	Yes	An inventory record in place for all the fertilizers in place and all stock amounts records
10.6.3A	Fertilizers shall be stored separately from pesticides, produce, food and feedstuffs, nursery stocks and any living quarters. They shall be adequately protected from weather elements in a clean and dry area.	Yes	All fertilizers were stocked appropriately in an appropriate fertilizer store and was separate from any food store, pesticide store and not near any living quarters. The area was clean, hygienic and appropriate for fertilizer storage
0.6.4A	Where stored together with pesticides, they shall be in separate compartments. and be well labeled.	Yes	N/A all fertilizers stored in appropriate, separate stores
L0.6.5A	Fertilizers shall be stored away from concentrated acids; such acids should be stored separately in lockable rooms.	Yes	No acid use in the farm as only one crop used which is avocado, when needed for unclogging of the drip lines, its procured and used directly and done by the supplier of the chemicals
10.6.6A	All hazard and risk areas shall be clearly indicated and correct hazard warnings posted in clear and understandable forms in English and Kiswahili and the local language where applicable. The warnings signs shall be prominently displayed both inside and outside at the entrance to the store.	Yes	Fertilizer store was well kitted with appropriate warning signage posted and were done in words

			(English and Swahili) as well as with pictorials
10.7	Organic fertilizers		
10.7.1C	The use of organic manure is encouraged for maintenance and improvement of soil fertility. It must be composted	Yes	N/A. No organic fertilizer
	and stored in an appropriate manner to contain the risk of contamination of the environment. This shall be in a		applied
	designated area away from water sources.		
10.7.2 C	Where organic fertilizer is used a documented risk assessment shall be carried out before use and shall consider the	Yes	N/A/No organic fertilizer
	source and characteristics of the fertilizer risks of disease transmission, weed seed, and method of composting.		applied
10.7.3C	Where organic fertilizer is used a documented risk assessment shall be carried out before use and shall consider the source and characteristics of the fertilizer, risks of disease weed and seed transmission and method of composting.	Yes	N/A. No organic fertilizer applied
10.7.4A	There shall also be records on site, crop and date of application as well as the analysis results and the nutrient calculations of the organic matter	Yes	N/A. No organic fertilizer applied
10.7.5B	The analysis must be carried out by a nationally recognized laboratory to determine the content of NPK in the organic manure/fertilizer.	Yes	N/A. No organic fertilizer applied
10.7.7A	No raw or untreated human sludge shall be used on the farm.	Yes	No organic fertilizer applied
10.7.9A	The application of such organic manures shall take cognizance of their nutrient contribution of NPK and be based on the nutrient management plan.	Yes	No organic fertilizer applied
10.7.10A	There shall also be records on site, crop and date of application as well as the analysis results and the nutrient calculations of the organic matter.	Yes	No organic fertilizer applied
10.7.11B	The analysis shall be carried out by a nationally recognized laboratory to determine the content of NPK in the organic manure/fertilizer.	Yes	N/A.No organic fertilizer applied
11	Irrigation and fertigation		
11.1	Water management		
11.1.1B	Operators should be conversant with concepts of soil-water relations, which enable water requirements to be accurately estimated.	Yes	The farm have a weather station and the data is used in determination of evapotranspiration and the farm has tensiometers used in the soil water content determination
11.1.2B	There must be a documented irrigation plan to optimize water usage and minimize wastage.	Yes	Documented irrigation water management plan ref MORL/IRR/PLN/01 that determines how to

			minimize wastage and optimize water use
11.1.3C	Water management may be supported by documentation on calculations of crop water requirements, and supported by data records e.g. rain gauges, evaporation pan readings etc.	Yes	Reviewed records of block 6 application and determination if irrigation water needs done dated 03-10-2022,04-10-2022 with 12m3 and 7 m3 of water used. Rainfall is also factored in when calculating the irrigation water needs
11.1.4A	All operators shall maintain valid water abstraction permits where applicable and in accordance with the Water Act Cap. 372, 2002.	Yes	Documented abstraction permit by Water Resources Authority ref WRMA/20- /00277/2EC/10736/G for a borehole approving abstraction of 20M3/Day and allowed for 5 years.
11.1.5A	Growers shall put in place measurement devices and maintain records of water consumption particularly of ground water.	Yes	Irrigation water is metered and recorded on the digital meters and the irrigation logs ref MORLA/GG/FORM/012 with irrigation water needs calculated using a formula that takes cognizant of the evapotranspiration rates and the soil water holding capacity as well as soil water needs. Reviewed records of block 6 application and determination if irrigation water needs done dated 03-10-2022,04-10-2022 with 12m3 and 7 m3 of water used. Rainfall is also factored in when

			calculating the irrigation water needs
11.1.6B	Records must indicate the date and volume per unit area of the irrigation unit. Where there are irrigation programs, the calculated and actual irrigated water volume shall be recorded as well.	Yes	All irrigation water application are recorded in record ref MORLA/GG/Form/012 with volume of water irrigated per block,date,meter reading, start time, finish time, total hours irrigated, fertigation use of not,rainfall,irrigation supervisor, verified by and any comments
11.2	Irrigation and fertigation method		,
11.2.1B	All operators must demonstrate understanding of the most water efficient means of irrigation and fertigation for their particular types of crop production.	Yes	All irrigation operators were reviewed trained on irrigation and drainage dated 11-03-2022 and soil water needs dated 12-05-2021
11.2.2A	The most efficient and practical water delivery system shall be used to ensure the best utilization of water. Efficient irrigation systems shall be used to make rational use of water.	Yes	Irrigation water need were determined using the soil tensiometer and also the hand feel method where water was reviewed if it needed some irrigation to be done
11.2.3B	Field personnel must be trained to recognize and rectify irrigation deficiencies such as pipe bursts to ensure remedial action is taken promptly to avoid water wastage.	Yes	The farm had an onsite water/irrigation personnel who was responsible for all water plumbing works such as water bursts and had been trained on plumbing with Grade 111 Certificate reviewed
11.2.4A	Irrigation/Fertigation water shall be abstracted only from sustainable sources. Abstraction shall be legal i.e. with the approval of the bodies mandated to take care of such natural resources.	Yes	All water was abstracted from borehole locate

11.2.5C	Operators will endeavor to harvest rainwater and recycle water used within their farms to reduce reliance on natural sources.	Yes	onsite and approved with a permit by water resources Authority valid to 2025 and was within the legal limits. The abstracted water was stored in a dam before use in the field operations All rainwater was harvested in storm drains dam and used in the farm hence reducing reliance on water from natural sources
11.3	Quality of irrigation water		
11.3.1B	There shall be a complete and regular risk assessment of irrigation/fertigation water reviewed at least annually or when changes to water sources or delivery system occur. and shall encompass potential microbiological, chemical or physical pollution of the water sources	Yes	A detailed irrigation water risk assessment in place done dated 18-03- 2022 and indicated that will be reviewed next in 2024 or when changes occur in either source or distribution of the water.
11.3.2B	The water quality analysis shall be performed by a laboratory of known and recognized competence and with the capacity to analyze for NPK, Electrical conductivity, microbial, mineral and chemical contaminants, pH, biological activity, heavy metals contaminants. Yes	Yes	The farm undertakes internal and external analysis with the 3 rd party analysis reviewed done by Crop Nutrition Laboratories dated 24 th May 2022 and the report detail on the parameter tested,units,results and the range. The report reference CM171WA0029 reviewed dated 24 th May 2022

			Internal water analysis reviewed done every week with the quality of the water assessed on PH, Conductivity,salinity,TDS, Turbidity,Chemical content
11.3.3B	The results of such analyses shall be well documented and where corrective actions are recommended, the nature of the corrective actions must be stated, documented and acted upon.	Yes	Any annormalities are well recorded with corrective action plans implemented and detailed on what was done to rectify the water
11.3.4B	The results of such analyses shall be compared with the relevant national or international standards.	Yes	The results were verified matched to Kenya standards for portability requirement details in KS EAS 12 and
11.3.5A	Any adverse results obtained shall be acted upon and the corrective actions well documented.	Yes	No adverse results noted in the reports
11.3.6A	The quality of the water both at the intake and exit points shall be analyzed on a regular basis (at least every three months) and the quality records kept. Determination of the contaminants, types and amounts present in the water supply and, where applicable, in the runoff water shall be considered as a basic step in developing a management plan.	Yes	Reviewed Analysis of week1 to week 4 September 2022 with quality of the water analyzed and was found free of contaminants.
11.3.7A	Untreated sewage water and effluent shall be not used for irrigation purposes.	Yes	N/A.No use of untreated sewage
11.3.8C	Construction and maintenance of artificial wetlands is encouraged as they provide very efficient and cost effective cleaning and decontamination of wastewater.	Yes	N/A.No Artificial wetland
11.3.9A	Where applicable dams shall be constructed so as to feed water to downstream users from their floors, not spillways.	Yes	Dams constructed with weirs and water is abstracted from the borehole and surface run off
11.3.10.	The operator shall provide training to managers and workers in the implementation of the Agricultural Production Plans, water quality management and water resource conservation protocols and procedures.	Yes	Training on water quality and Agricultural production plans reviewed done by Daniel Louis dated 03-07-2022 to

			site supervisors and managers
12.1	CROP PROTECTION		
12.1	Pest and diseases		
12.1.3A	The operator shall monitor the pest and diseases in the facility to ensure that the plants receive all necessary treatments which are appropriate according to the pest or disease.	Yes	Monitoring of pest and diseases is done in accordance with scouting protocol detailed in the integrated farm assurance manual ref MORL/AGRIC/MAN/0001 and the scouting done and recorded in scouting records ref MORL/GG/FORM/015 reviewed and threshold reviewed as 10% and anything above 10% initiates an action. Sampled 1-10-2022 where switch ;copper suplhate was recommended and done dated 08th October 2022
12.1.4	The following principles shall be observed for propagation materials:		
12.1.4.1	Sanitation		
	 i. An approved written procedure detailing Sanitation must be available. ii. Entry to propagation facility should be restricted and a foot bath with a disinfectant provided at the entrance to prevent spread of soil borne diseases. 	Yes	N/A.No propagation material area. All materials are propagated in approved nurseries and
	iii. To have access to and use an accredited laboratory (internal or external) where plants are checked for diseases, and where soil and water is analysediv. This should be in accordance to the relevant standard for irrigation water, drinking water and for other		procured from those approved KEPHIS nurseries and imported with accompanied Phytosanitary documents
	operations v. A double door system should be introduced where applicable in all propagation facilities to minimize entry		in place. See details on crop

	of pests and diseases.		
	vi. Cutting tools should be disinfected regularly. The disinfectants should be changed regularly.		
	vii. Ensure that lose dust in propagation facility is minimized		
	viii. Water used in propagation facilities shall be free from physical, microbial and chemical	contaminants.eg	
	treatment with either chlorine, calcium hypochlorite, copper sulphate, aluminium sulphat	e, UV light or by	
	ultra-filtration before use.		
	ix. Personal protective equipment for every propagation facility should be provided to	prevent cross-	
	contamination		
	x. Movement from one propagation facility to another should be avoided.		
	xi. pH of Irrigation water should be monitored regularly and adjusted accordingly as it affects	cts availability of	
	nutrients and multiplication of certain plant disease causing organisms.		
	xii. Tools and equipment in contact with propagation materials such as trays/crates/bags should	d be disinfected.	
12.1.4.2.	Control of diseases and pests		
	i. Diagnostic tools for various diseases and pests of economic importance should be available	e to screen plant Yes	No propagation of
	materials and prevent pest and disease spread.		material done onsite
	ii. Soils and propagation facility should be disinfected (fumigated/steamed) or using	other applicable	
	technologies before setting up propagation facility and after growing a number of cycle	s of propagation	
	materials.		
	iii. Ways of obtaining clean planting materials such as tissue culture should be explored		
	iv. Rigorous and periodic scouting should be carried out and where infection is detected early	y, infected plants	
	should be removed followed by destruction of rouged plants and treatment of infe	cted areas with	
	disinfectants.		
	v. All persons entering propagation facilities should wear clean and appropriate protective clean	othing as per PPE	
	policy to minimize introduction and spread of pests		
12.1.5	Cleaning of benches, working knives and hands should be carried out using disinfectants.	Yes	No propagation of material done onsite
12.1.6	Plants that are suspected of, or diagnosed as having disease must be isolated, treated or destroyed.	Yes	No propagation of material done onsite

12.1.7	Cultivation systems should be in a clean medium.	Yes	No propagation of material done onsite
12.1.8	Plants must be grown in a system that does not allow cross contamination with surrounding soils.	Yes	No propagation of material done onsite
12.1.9	Propagation facility floors and pathways should be covered to minimize contamination.	Yes	No propagation of material done onsite
12.1.10	Operators must ensure that plants are taken care of to minimize diseases and pest risks to other plants in the breeding/ propagating/growing facility and the surrounding farms.	Yes	No propagation of material done onsite
12.1.11	Breeders/ propagators must provide a hygiene protocol listing procedures and practices used to ensure clean diseases free material.	Yes	No propagation of material done onsite
12.2	Pest and Disease Management		
12.2.1A	Operators shall demonstrate up to date knowledge of the properties of the range of recommended crop protection products currently available, chemical, biological and other forms of control.	Yes	The farm has developed a crop protection product plan(Spray plan) but with minimal spraying planned as most of the controls in the avocado orchard are done using integrated pest management practices e.g Using insect traps and using Pheromone traps in controlling pest and diseases.
			Operators are trained on Scouting practices with the most recent training dated 11-08-2022. The Agronomist who advises on crop protection was reviewed to have a PHD In plant Genetics and Crop Protection from Hebrew University of Jerusalem
12.2.2A	Management strategies to keep pest levels below economically damaging thresholds shall be devised using the most appropriate combination of biological (use of natural enemies), cultural, mechanical/physical, monitoring (scouting)	Yes	Scouting is done and incase of pest infestation beyond the required

	and chemical (plant protection products) methods. They shall be based on a thorough evaluation of the situation, taking into account integrated pest management systems.		threshold, a mitigation strategy is chosen based on the severity and options available in pest management systems
12.2.3B	The presence of pest and diseases is predictable and control must be achieved by an integrated strategy. Consequently as part of a responsible approach, a long term strategy for control must be drawn up for each crop including: a. past history of infestation; b. indication of main threats; c. understanding and implementation, where possible, on non-chemical options; including rotations, crop hygiene, resistant varieties, cultural and biological control; d. Avoid production of fruits and vegetables under stresses as some diseases become severe in stressed plants.	Yes	An integrated pest management strategy in place ref MORL/PRD/01 with consideration of past history of infestation; indication of main threats; understanding and implementation on nonchemical options; rotations, crop hygiene, and has also factored appropriate cultural and biological control including use of pheromone traps, use of smoke to eliminate some pest and that the farm is free of weeds
12.2.4A	An effective crop protection programme shall be implemented.	Yes	Implementation of the integrated crop management practices reviewed well.e.g 19-07-2022 Changed Yellow traps and Blue traps in the farm following scouting that reviewed accumulation of Avocado pest(Systane's weevil) and Mediterranean fruit fly.
12.2.5A	The implementation of the Integrated Pest Management on a preventative basis, where technically feasible and economically viable, shall be supervised by a technically competent person.	Yes	Supervision of all ICM practices done by the farm manager with all the approvals of changes such

			as sticky traps, pheromone traps done by the Farm manager who was reviewed qualified on the basis of education, training and experience. He qualification in Agricultural science
12.3	Pest Control Products Use		
12.3.1	Soil fumigation		
12.3.1B	Alternatives to chemical soil fumigants shall be explored before resorting to their use.	Yes	NA No soil fumigant used in the farm or soil conditioning
12.3.2B	Use of fumigants shall be minimized and when used there shall be documented records for use including location,	Yes	NA No soil fumigant
	date, active ingredients, doses, method of application and operators name and written justification for their use.		used in the farm or soil conditioning
12.3.3A	Only pest control products registered by a competent authority shall be used in any production process. They shall be	Yes	NA No soil fumigant
	used in accordance with the prescription for purpose fit for use. Operators shall keep up to date with the most		used in the farm or
	current list of acceptable pest control products locally and internationally as applicable.		soil conditioning
12.3.2	Resistance management		
12.3.2.1A	Products must be chosen to avoid over reliance or continued use of any single chemical grouping, thus reducing the emergence of pesticide resistance.	Yes	Resistance management of crops was reviewed done using alterative chemicals all addressing the same issue. There was no spraying that was reviewed done continuously of the same chemicals however alternatives were used to ensure that pest do not develop resistance

12.3.3B	Application conditions		
12.3.3B	Pesticides shall not be applied in adverse weather conditions such as wind, rain or during overhead irrigation. Spraying during high mid-day temperatures should be avoided.	Yes	In the spray application record where approvals are sought for every chemical application, the weather condition was reviewed well noted and spraying was done very early in the morning starting at 3 am to 5 am when the weather was calm and application do not have any diverse effect to the environment and the ecosystem through spray drifts. Reviewed application records for spray between 13-05-2022 and 19-08-2022(Applications done). All products are given a window period of 8 weeks when no application of chemical is done to act as the period in which PHI is achieved appropriately, This clears off all the chemical applications done
12.3.4A	Procurement of pesticides		
12.3.4.1A	Purchasing shall only be done for pesticides that are: a) Registered as per the Pest Control Act(Cap 346) Current list of approved pesticides registered by the PCPB can be obtained on request, also available from the PCPB website. b) from licensed distributors; c) Labeled by the manufacture as per the Pest Control Products Act, Cap 346 d) Accompanied with material data sheet.	Yes	All crops protection products used followed the latest version of PCPB list(Rev 08) and with te target pest and disease being as the one on the label with sampled chemicals applied in the PCPB List e.g Master Cop applied 06-09-2022 on

	e) Purchase receipts of all pest control products shall be maintained for at least 12 months.		Botrytis . MASTERCOP 60 SC(PCPB(CR)1424)Copper Sulphate Pentahydrate 236 g/L equivalent to 60 g/L copper TECTO 500 SC(PCPB(CR)0914) with A.I Thiabendazole 500g/L BIOSURE 120 SL(PCPB(CR)1423)Benzoic acid 120 g/L All products sampled received were all covered with purchase documents including delivery notes, receipts and the organization maintained labels in file for all products applied. The organization had two MSDS (One in the file in the office and another in the file within the chemical store)
12.3.4.2A	A register of the types and characteristics of all pesticides used on the farm shall be maintained.	Yes	A file was maintained with all stocked chemicals listing all the chemicals, quantities in stock, the active ingredient for the chemicals, Batch number and receipt date and all herbicides were kept off from pesticides.
12.3.5	Transport of pesticides and hazardous chemicals		
12.3.5.1A	Written procedure for transport of pesticides shall be developed and communicated to all involved in the transport whether on the farm or on transit.	Yes	All chemical mixes within the farm were

			transported with a boom sprayer (Boom 1) and this was on farm transport. Chemicals were sealed appropriately in the boom and handled in accordance with the procedure on Transport of hazardous chemicals on farm (MORL/PP/07). Chemicals transport to the farm was reviewed done by the manufacturer themselves
12.3.5.2A	Drivers and turn-boys shall be trained in emergency procedures in the event of accident, fire, spillage and direct contact with persons. Proof of training by a recognized organization is required.	Yes	All transporters were reviewed trained on safe use of chemicals by Ken Agro Chemicals dated April 2022 and also trained internally by Raphael on the emergency procedures and responses incase of various events such as chemical spillage.
12.3.5.3A	Pesticides shall not be transported together with food, animal feed or general consumer goods. They shall be transported in a suitable, self-contained box or container.	Yes	No Chemicals and fertilizers are transported together with harvested product. Harvested product are transported in dedicated trucks to the packing facility on farm and the transport equipment is enclosed
12.3.5.4A	Vehicles used to transport pesticides shall be furnished with suitable equipment and materials such as protective clothing, fire extinguisher, sand, shovel, among others, to deal with emergencies.	Yes	The Boom spray is kitted up with spillage kit including sand, shovel, dustpan, brush and a disposal kit. The same emergency kits

			were also found in the fertilizer store and in the chemical storage facility.
12.3.6.0	Storage of pest control products,		
12.3.6.1	Pest control products stores shall be licensed by the competent authority		
12.3.6.2A	Chemicals shall be stored in suitably constructed stores of sound structure, enclosed/secured/locked and well ventilated which meet minimum technical requirements and conditions.	Yes	A complete separate storage was found constructed made of concrete and fabric materials used for storage of chemicals. The store was sound and was secured using a padlock with only authorized persons accessible to the facility. The area was ventilated and had a disposal kit
12.3.6.3A	Only approved pesticides in original labeled containers shall be held in the store. No other commodities shall be stored with pesticides	Yes	All chemicals were reviewed stored in original containers and held in a dedicated store used for chemical storage only
12.3.6.4A	Pesticides shall be kept in a separate room and shall be kept secure from children and animals, foodstuffs, fires, stoves or lamps. In the case of the cupboards, the shelf shall have a front lip to prevent containers from falling out on opening the doors. Access shall be limited to suitably trained and authorized personnel.	Yes	All pesticides were stored in a separate room and secured from children and animals and were stocked on shelves that had plastic covers and some on plastic pallets with a plastic cover on top
12.3.6.5A	Large quantities of pesticides shall be kept in a purpose built store, separate from other buildings or section in a building that can be securely locked. Plans of an approved pesticide store may be obtained from authorized institution.	Yes	Only small amounts of pesticides are stored in the store as the crop does not need large application of chemicals. All chemicals used were registered by PCPB

12.3.6.6A	Warning in English, Kiswahili and local language where applicable shall be placed on the outside of the pesticide store. Warnings and/or symbols such as— NO SMOKING, NO NAKED FLAMES among others, shall be displayed both inside and outside, the pesticide store.	Yes	The store had warning signages displayed by the door and near the store with both pictorials and words warning done and posted by the site.
12.3.6.7A	Stock shall be inspected regularly and stock records maintained.	Yes	All entries related to usage and intake of pesticides were recorded on the SAP system and on the Bin Card system that was in the store.e.g sampled master cop which indicated that was 13.29 in stock level and onsite the bon card indicated that the amounts available were 13.30l and hence corelate
12.3.6.8A	Storekeepers shall receive training regarding the toxicity of pesticides, their storage, handling and dispensing.	Yes	The store keeper was reviewed trained on basic safe us of chemicals by Ken agro in April 2022.From interview he understood the toxicity of pesticide, emergency plans and how to dispense chemicals safely.
12.3.6.9A	Written procedures shall be developed for handling events such as accidents, fire, spillage or poisoning of personnel. These should be displayed in languages understood by users in accessible areas.	Yes	Written procedures were reviewed documented, posted and implemented on emergency plans in place .eg incase of chemical spillage, in case of fire, Food poisoning and they were all translated to Swahili language which was the local language used by most workers onsite

12.3.6.10A	Stores shall be equipped with adequate and appropriate firefighting equipment. Maintenance records on fire extinguishers shall be maintained.	Yes	By the store was a fire extinguisher which had been maintained in July 2022 and next was planned In Dec 2022 by Fire safety inspectorate services. Both CO2 and Dry powder fire extinguisher were there. Records of maintenance were reviewed
12.3.6.11A	Shelves in stores shall be made of non-absorbent and non-flammable material. Materials to deal with leakage and spillage shall be available in the store. These may include sand, shovel, broom and empty disposal bin.	Yes	Shelves are made of non- absorbent material (Plastic) and the store had a budding incase of any spillage. Also found was a complete spillage kit and a disposal kit. All spillage were covered with sand and disposed off to the designated area where empty crop protection products are stored and locked for collection by ECC
12.3.6.12A	There shall be adequate washing facilities near the store. The store shall be bunded to contain any spillages and contaminated water used for cleaning or firefighting.	Yes	A hand washing facility and an eye wash was in place and next to the store. The handwash was provided with soap and water Spillage kit in place and
		165	consisted of a brush, sand in a container, plastic disposal kit and were all labelled. The store was bunded to contain any spillage
12.3.6.14A	Drainage shall be to a sump or adequate waste water treatment facility which shall be situated far from all water sources and does not drain into riparian land. They shall be adequately marked or labeled.	Yes	No waste water from farm. Only PPP mixes waste water and this was

			disposed in a soak-pit
12.3.6.15A	All personnel working in pesticide stores shall have access to suitable Personal Protective Equipment.	Yes	All personnel applying Crop protection products were kitted up with appropriate P.P.E including spray suit, gum boots,gloves,respirator and googles. The condition was reviewed appropriate
12.3.6.16A	Pesticides and fertilizers shall be stored separately, and away from detergents or disinfectants.	Yes	All chemicals are stored in separate store away from any detergents or dis infectants
12.3.6.17A	Pesticide store shall be located away from water sources	Yes	The chemical store is away from water sources and way from any water bodies
12.3.7	Selection of pest control products		
12.3.7.1A	Pesticides used shall comply with the local regulations.	Yes	All crops protection products used followed the latest version of PCPB list(Rev 08) and with te target pest and disease being as the one on the label with sampled chemicals applied in the PCPB List e.g Master Cop applied 06-09-2022 on Botrytis . MASTERCOP 60 SC(PCPB(CR)1424)Copper Sulphate Pentahydrate 236 g/L equivalent to 60 g/L copper
			TECTO 500 SC(PCPB(CR)0914) with A.I Thiabendazole 500g/L BIOSURE 120 SL(PCPB(CR)1423)Benzoic

			acid 120 g/L
			All products sampled received were all covered with purchase documents including delivery notes, receipts and the organization-maintained labels in file for all products applied. The organization had two MSDS (One in the file in the office and another in the file within the chemical store)
12.3.7.2A	The operator shall consult regularly and be aware of any restrictions on pesticides used and shall have documentations on such restrictions.	Yes	All operators are trained on safe use of pesticide by KENAGRO ltd IN April 2022
12.3.7.3 A	Pesticides classified as —Extremely Hazardous and —Highly Hazardous (WHO Class Ia and Ib) shall only be used in justified circumstances and where no viable, economic alternative exists and shall be used by competent/licensed spray operator	Yes	No use of class hazardous chemicals (No use of Class 1 chemicals are banned in the organization
12.3.7.4 A	The technical person responsible for pesticide choice and application shall be competent by training.	Yes	The person advising on the chemical application to be done was reviewed trained with a PHD In plant genetics and Crop protection from Hebrew University of Jerusalem and the assistant Raphael was trained on IPM/ICM, Scouting and plant protection products application (Raphael)
12.3.7.5A	There shall be written justification to show that the choice of pesticide is appropriate for the intended purpose.	Yes	On each application done a justification of the

12.3.7.6A 12.3.7A	over reliance on pesticides with similar mode of action shall be avoided where repetitive applications are required to eliminate pest resistance The application rate of pesticides per given area and the dilution rates shall comply with recommendations on the product label. Where a choice exists, a product that is safer to handle and has less environmental impact shall be chosen.	Yes Yes	application of the chemical was reviewed detailed .e.g 06-09-2022 (MasterCop) justification on application related to Botrytis No use of repetitive chemical applications Calculation of the chemical needed depending on the acreage was reviewed in place
12.3.7.8A	There shall be documentation to show that the correct dosage of the pesticide for the intended crop has been followed in line with label instructions on calculations and preparation	Yes	Application dosage sampled between March and August 2022 when application of chemicals was done were as per the label requirements on usage
12. 3.7. 9A	Selection and the use of a pesticide shall be such that non target organisms such as bees are not harmed.	Yes	Target organism in place and the organization had a policy on maintenance of bio diversity and environmental care. No use of class 1 chemicals onsite. Application of pesticides was such that it was on leaves and the chemicals used to non harm non targeted organism e.g bees
12.3.8	Dispensing of pesticides and hazardous chemicals		
12.3.8.1A	There shall be a separate area for dispensing of pesticides and hazardous chemicals fitted with: a) workbench; b) Running water supply shall be within at least 5 meters from the dispensing areas; c) wash basin plus eyebath; d) accurate measuring equipment;	Yes	A chemical dispensing area and weighing area has been provided in the stores with a workbench, weighing scale and measuring jars,

12.3.8.2A	e) suitable containers for pre-mixing of pesticides/chemicals; f) Clear marking on all equipment to indicate they are for use with pesticides/chemicals only. Adequate and appropriate personal protective clothing and equipment shall be worn by those persons doing the dispensing.	Yes	emergency eye wash fitted 3 m from the stores and clearly marked equipment's in place which were only dedicated for use in pesticide/Chemicals only The storekeeper and the farm manager were
			provided with appropriate P.P.E that are equivalent to sprayers P.P.E including spray suit, gum boots, hand gloves (Rubber),
12.3.9	Advice on quantity of pesticide application		
12.3.91A	Recommendations on application of the pest control products shall be given by persons of demonstrable competence attained through training and the relevant documentation availed.	Yes	Reviewed certificate of training relating to agrochemical use were reviewed relating to farm manager and assistant farm manager as well as the adviser who advises on chemical usage had been trained on Plant protection products use
12.3.9.2B	Determination of the quantities must factor in the velocity of application, the surface area to be applied, pressure of the application system and the speed of application. The related documentations shall be done.	Yes	Application of crop protection products was reviewed done based on recommended rates and the application also factored the machine to be used in application e.g., Knapsack speed was lower than that of the boom sprayer. Calibration of these equipment's before use was reviewed with records verified for intermittent dates between 13-03-2022 and

			19-08-2022
12.3.10	Application of pesticides and protection of workers		
12.3.10.1A	Employers shall ensure that employees are given information, instruction, training, and guidance to carry out their work and to be aware of the risks to health from exposure to pesticides and the precautions to be taken.	Yes	All employees have been trained on entry and re entry intervals procedure including how to identify a sprayed blocks which are done on open field.
12.3.10.2A	Signs to restrict personnel access to area under pesticide application or treated with pesticides must be displayed.	Yes	Signage in place detailed and warns personnel
12.13.10.3A	All spray operators and supervisors shall be suitably trained on the application and risks of pesticides by a recognized institution or body. A training Schedule for the operators and supervisors shall be established.	Yee	All spray operators were reviewed training by Ken agro and hence some documents got lost
12.3.10.4A	All spray operators shall wear personal protective clothing and equipment suitable for the task at hand and this shall be provided by the employer without charge. Spray operators shall not wear personal home clothing when spraying. Provision of secure well-ventilated storage shall be provided for personal clothing. PPEs shall have designated area for washing, drying, and storing. Appropriate dressing rooms and double individual lockers for each worker shall be provided.	Yes	All spray operators have been kitted up with appropriate P.P.E all done by the employer, and they are washed and stored onsite in a well-ventilated storage. A designated washing area for the clothes has been if drains into a soak pit
12.3.10.5A	All workers involved in application and handling of pesticides shall be provided with waterproof overalls as well as appropriate respirators, which shall be changed regularly according to manufacturers' recommendations. Application shall be timed to avoid the hottest hours of the day. Minimum safety band to natural water bodies/employees shall be observed.	Yes	Waterproof spray suit provided and are regularly changed whenever torn or worn out. No spray is done close to water bodies. A barrier has been provided which is made of natural grass which separates the active orchard and the seasonal riverbeds. This area provided is a strip of more than 10 m
12.3.10.6A	After applying pesticides, spray operators shall remove all protective clothing and take a shower. Facilities for this including soap, towel and water shall be made available	Yes	After any spray all operators do wash their

				bodies onsite on some provided bathing area and the facility has been provided with adequate warm water. All spray operators have been provided with a t-shirt and a short used in bathing as well as a soap
12.3.10.7A	All waterproof personnel protective clothing and equipment shall be rinsed immediately after use in an area where	Yes		All water from washings
	the rinsing water can be channeled to chemical wastewater treatment facility. Protective overalls if continuously used			both the spray suit and
	shall be laundered after use and stored in a hygienic well-ventilated location on the farm.			sprayers bodies are directed into a soak pit
12. 3. 10.8A	All staff involved in the use and application of organo-phosphate and carbamate pesticides shall have a medical	Yes		No application of organon
	checkup at least twice per year but preferably every three months. Such check-up shall include sampling of blood			phosphate carbamate
	cholinesterase levels compared with baseline level determined before being assigned the task and after a time away			
	from pesticide exposure i.e., a period of leave. The findings shall be communicated to the persons examined in a			
	readily understandable manner. Complete documentary records shall be available for audit purposes. In the event of			
	adverse results, the doctor's advice shall be followed. Guidelines on organo-phosphorus poisoning, monitoring and			
	treatment are available within the farm. Spray operators not applying these organo-phosphate and carbamate			
	pesticides shall have a medical checkup at least once a year.			
12. 3.10.9A	All equipment used for spraying shall be regularly inspected, well maintained, calibrated, and serviced. Any defective		No	
	equipment shall be repaired and/or replaced immediately and be verified by a competent person.			Though the organization had 3 knapsacks used in application of plant protection products in the orchard that had been well maintained it was noted that 3 knapsacks used in chemical application were not clearly identified with identified and differentiated means physically and in the logbook showing

			maintenance.
			All equipment including the fertigation unit were calibrated. Details of calibration detailed in above report
12.3.10.10A	Each application shall be accompanied by clear instructions on the specific crop location, where the crop protection application is to be done, the requisite dosage and the application technique signed by the authorizing officer.	Yes	Clear instruction on application of chemicals covers the block, area, time, the Crop Protection Products to be used, amount of water to be used and authorizing signature
12.3.10.11A	All workers within the vicinity to be sprayed and not wearing protective clothing shall leave the area. Warning signs shall be displayed at greenhouse entry/exit points and field gates stating time and date of application, pesticide being used and indicating when entry will be safe without the use of protective clothing.	Yes	All sprayed blocks are indicated with red flags and all workers have been trained about the red flags in the farm and that they should not enter a block with red flags
12.3.10.12A	Material safety data sheets of all pesticides used shall be kept on file.	Yes	Material safety data sheets reviewed for all chemicals e.g. mastercop, Green Copper
12.3.10.13A	Spray mixing and application shall only be carried out by trained personnel. No expectant and nursing mothers or persons under the age of 18 years shall handle, mix or apply pesticides. Female workers are discouraged from handling pesticides.	Yes	All spray operators are men, and all are over 18 years of age. No pregnant woman is allowed near anywhere spray is being done
12.3.10.14A	Partly used containers shall be returned to the store with caps and lids properly replaced. All returns shall be documented	Yes	Any chemical not used is stored back in original container and usage documented and deducted from the main quantities held
12.3.10.15A	Pesticides with a high leaching potential or high aquatic toxicity shall be not used within 200 metres of open water	Yes	No application of chemicals done near any

	sources, dams, lakes, rivers.		water bodies such as dams and flowing rivers. The organization has provided a gap of about 20 m between the active area used in farming and the water bodies. No toxic chemical used onsite
12.3.10.16A	documented re-entry policy and procedure shall be put in place as preventive measure to avoid employees health risks	Yes	Documented re entry procedure in place ref MORL/PP/RE/09 which dictate that any sprayed block must have a red flag done
12.3.10.17A	Pesticide application method must ensure that non target organisms such as bees are not harmed.	Yes	Pesticide used are only class 0,2 and 3
12.3.10.18A	The pre harvest interval must be stated for all the crop protection products applied and the first harvestable date indicated/recorded.	Yes	Records of application also indicate the block clearance date
12.3.11	Pre-harvest intervals		
12.3.11.1A	The crop protection policy shall provide safeguards to ensure that only pesticides approved for use on the crop are applied in accordance with the label rates and pre-harvest intervals. Procedures shall guarantee that harvesting cannot commence before the pre-harvest intervals have expired.	yes	All application of chemicals reviewed were done in accordance with the manufacturer instructions and PHI indicated. All block clearance were done by Raphael M who is the farm assistant manager and must verify that they have achieved the required PHI. All Crop protection products stops 8 weeks before harvest
12.3.11.2A	The pre-harvest intervals shall be observed for the respective crop chemicals used through use of records such as pest control products application records and the crop harvest date.	Yes	All block clearance were done by Raphael M who is the farm assistant manager and must verify that they have achieved

			the required PHI. All Crop protection products stops 8 weeks before harvest
12.3.11.3A	Regular audits and training shall be conducted to check consistency in the process and underpin the practice.	Yes	Training on Safe use of chemicals done on April 17th by Ken agro and regular training on safe harvesting and block clearance done by Dan Louis the farm manager to all operators with sampled training done 06-08-02022
12.3.11.4A	For crops that are continuously harvested over an extended period of time, there shall be a plan for the crop protection practice that does not compromise pre-harvest intervals.	Yes	All block clearance were done by Raphael M who is the farm assistant manager and must verify that they have achieved the required PHI. All Crop protection products stops 8 weeks before harvest
12.3.11	Records of application		
12.3.11.1A	Pest control products. application records shall specify the name and variety of crop treated, the geographical area, name and or reference of the farm, the block where the crop is located as well as the trade name, active ingredients of the applied products, amount, the date and time of application, toxicology ratings, location of the crop and weather conditions. The records shall also include the name of the spray operators and supervisors, equipments used, dosage rates, crops and reason/justification for use and re-entry intervals and signed by an authorized technical person.	Yes	Records of application of crop protection products details on the block, name of chemical, A.I, Rate of use, quantities used, quantities of water used, target pest, date
			and time, PHI, weather condition, spray operators, equipment to be used, reason/justification, authorizing signature
12.3.11.2A	Detailed spray records shall include; treated area and any incidents such as equipment failure, spillages of chemicals	Yes	and time, PHI, weather condition, spray operators, equipment to be used, reason/justification,
12.3.11.2A 12.3.11.4A	Detailed spray records shall include; treated area and any incidents such as equipment failure, spillages of chemicals etc. The records must also give the name of the pest, disease(s) or weed(s) treated. The re-entry interval shall be stated for all the crop protection products applied and the re-entry time indicated and	Yes	and time, PHI, weather condition, spray operators, equipment to be used, reason/justification, authorizing signature

12.3.11.5A	A list of spray operators indicating status of the most recent attendance at spray training course and records of the work rotation program, regular medical checks and the cholinesterase tests shall be available.	Yes	block boards and on spray application record. All block clearance were done by Raphael M who is the farm assistant manager and must verify that they have achieved the required PHI. All Crop protection products stops 8 weeks before harvest Training on safe operation of equipment's done dated on 17th April 2022 by Ken agro chemical suppliers. Spray rotation not required as the farm uses minimal chemicals and only for a short period of time within the season then stops
12.3.11.6A	A spray supervisor's log book shall be maintained and shall include records of PPEs and dates of issue.	Yes	P.P.E issuance records in place detailed in a book ref MORL/SP/PP/010
12.3.11.7A	All spraying machines shall have a logbook showing maintenance, regular calibration checks, dates of service etc.	Yes	All machines have been regularly calibrated with the latest application of chemicals done in August when they were last calibrated
12.3.11.8A	An accident and incident diary shall record all accidents and emergency incidences such as spillage, poisoning cases, sicknesses, absences from work and the remedial actions taken.	Yes	An emergency log in place which detail out any incident or accident. There has not been any incident or accident onsite
12.3.11.9A	Notices shall be posted giving emergency procedures, contact persons and institutions (in case of fire, spillages, and direct contact of chemicals with humans or animals).	Yes	Emergency contacts have been posted

12.3.11.10A	There shall be trained first Aid Personnel within the premises and a record of training kept on file. There should be a record of obsolete or expired pesticides and empty containers.	Yes	10 trained first aiders in the farm and the first aid boxes are well stocked with all appropriate material. First aiders had been trained by St John Ambulance in Sept 2021 A record has been provided to record any expired chemicals or any disposal of empty pesticide container
12.3.11.12A	 other records and documentation to be kept in addition to those required by the laws shall include: a) agrochemical stock record. b) a list of personnel who have access to pesticide stores, those responsible for transport, mixing and handling of pesticides and records of their relevant trainings. c) a list of all the chemicals used in the farm; d) a list of — "Hazardous" and — "Highly Hazardous" (WHO Class Ia and Ib) pesticides in use on the farm including; source, application and disposal records and classification. Information about Pesticide, product labeling requirements are as shown in annex E. 	Yes	A bin stock card that details out the stocking level of the stores has been provided together with a loss of personnel allowed to operate and spray chemicals. A list of all chemicals used on the farm has been provided
12.3.12A	Application equipment		
12.3.13	Measuring equipment and facilities shall be adequate for mixing of the pest control products so that the correct handling and filling procedures as is stated on the label can be followed. Application equipment shall be dedicated to intended use for the purpose of controlling pesticide cross contamination Disposal of Surplus Pesticides	Yes	All measuring jars were appropriate and had measuring reading well labelled
12.3.13.1A	Written procedures for safe disposal of dilute pesticides and empty containers shall be developed, approved and communicated to all those handling such products. The procedures must include fail-safe measures to prevent pollution of ground water and soil from leakage or spillage.	Yes	No surplus chemicals mixed however in case of any this is disposed in a soak pit provided
12.3.13.2A	Disposal of concentrates, obsolete and expired pest control products shall be done through approved NEMA agents and records kept. Obsolete and expired pest control products shall be clearly segregated and marked "obsolete and expired pest control products"	Yes	All obsolete chemicals, expired chemicals are disposed through Environmental Consultant combustion as well as

			punched empty pesticide containers. The latest receipt was dated 28-06-2022
12.3.13.3A	The distance of disposal sites from surface water and from boreholes. Shall comply with NEMA regulations.	Yes	Disposal/aggregation site is far away from any water bodies
12.3.13.3A	Disposal sites shall be securely fenced, locked, and labeled with warning signs.	Yes	Site has been well labelled with appropriate signage
12.3.13.4A	If surplus mix is sprayed on untreated part of the crop, recommended dosage shall not be exceeded and the treatment recorded appropriately.	Yes	No surplus Chemicals
12.3.13.5A	Personal protective gear shall be available for all staff involved in pesticide disposal.		P.P.E provided to all spray operators
12. 3.13.6.A	A record of disposal of expired pesticides, excess pesticides, pesticide containers shall be kept	Yes	Records of disposal of empty pesticide containers held e.g., disposal done 28-06-2022 to ECC.A cage has been provided and labelled where the empty containers are aggregated
12.3.13.7A	Where disposal services are outsourced, the disposal agent must be approved by NEMA, and waste disposal record shall be kept.	Yes	The contractor is an approved waste handler by NEMA with license valid to 31-12-2022
12.3.14	Empty pest control products containers		
12.3.14.1A	All pest control products containers shall not be reused.	Yes	No re use of empty crop protection products
12.3.14.2A	There shall be a secure storage point for empty containers and safe handling system to ensure non-exposure to persons and animals. All containers shall be clearly and adequately labelled.	Yes	All empty crop protection products are aggregated and stores in a cage awaiting collection and disposal. This is done in a secured cage, and they are triple rinsed and punched hence cannot be re used
12.3.14.3A	The disposal system shall respect the legislation governing the same and shall take due regard to the safety of flora	Yes	All empty crop protection products are aggregated

	and fauna.		and stores in a cage awaiting collection and disposal. This is done in a secured cage, and they are triple rinsed and punched hence cannot be re used
12.3.14.4A	All empty pesticide containers shall be triple rinsed and the rinsate shall be poured into the spray tank and the container punctured and crushed. Plastic containers shall be disposed as per NEMA regulations	Yes	All empty crop protection products are aggregated and stores in a cage awaiting collection and disposal. This is done in a secured cage, and they are triple rinsed and punched hence cannot be re used
12.3.15B	Unwanted pest control products		
12.3.15B	There shall be documentation regarding redundant products which may be accepted back by the supplier if in good condition and in sealed, original packing. They shall be labeled and separated securely within the store. Where unaccepted they shall be disposed of as per NEMA regulations.	Yes	No unwanted crop protection products were found in stock as they stock minimum chemicals but incase this would be disposed through ECC
12.3.16A	Application of pesticides by shippers / cargo handlers and consolidators		
12.3.16A	Where shippers / cargo handlers and consolidators are licenced to use pesticides in their operations for pest management the provisions of section 12 shall apply to them with the necessary amendments.	Yes	N/A No shippers and consolidators
12.3.17	Pesticide residue Monitoring		
12.3.17.1C	There shall be a deliberate effort based on risk assessment to minimize pesticide residues through periodical residue analysis. Pre-harvest and post-harvest sampling and analysis is highly recommended. Operators shall be in possession of up to date National Maximum Residue Levels (MRLs) requirements or as set by the importing country	Yes	MRL is risk assessment is in place detailed with ref MORL/AGRIC/FORM/30 last done 30 th October 2021 and planned to be done annually.
12.3.17.2C	The operator shall be able to provide objective evidence/records kept of such residue testing done by an accredited laboratory. Residue test records shall be traceable back to the batch/consignments, grower and to produce production site.	Yes	Latest MRL test which was a composite sample taking into consideration all the blocks of the farm and the latest done dated

			19-05-2022 report ref C6370893 by Groen Agro Control dated 20-05-202 ref BSST220519818
12.3.17.3C	The operator shall be able to produce evidence of residue testing and document the results of such analyses for at least 12 Months.	Yes	blocks of the farm and the latest done dated 19- 05-2022 report ref C6370893 by Groen Agro Control dated 20-05-202 ref BSST220519818
12.3.17.4C	The operator shall establish a written action plan in the event of the Maximum Residue Level (MRLs) being exceeded.	Yes	Written Clear action plan in case of exceedance reviewed ref MORL/AGRIC/FORM/030 dated Oct 2021
13.0	Harvesting and postharvest handling of produce		
13.0	Workers shall be trained and supervised closely to ensure that the produce is harvested in the right way and at the correct maturity. Training and supervision procedures shall be documented. Smoking, eating, chewing and drinking shall only be permitted in designated areas away from immediate vicinity of harvesting, grading, packing, or storage operations. Signs shall be displayed to this effect.	Yes	Documented procedure in harvesting and harvest hygiene version 01 dated 04-01-02021 in the manual Agri/Man/001
13.0.1A	Product Integrity		
	Operators shall ensure the integrity of product consignment throughout the handling phases including storage, transportation, repackaging where necessary, and loading into a freight vessel	Yes	All avocados are harvested into crate, and all are in labelled and the crates are cleaned internally using chlorine at 100ppm and dried. All produce is collected into a shade and loaded from is collected using a tractor to the packhouse
13.0.2	Machinery Machinery that comes into contact with produce shall be of a design that prevent contamination of the product, be	Yes	N/A.all avocado
	readily cleaned and well maintained		harvested by machine as all avocados are harvested in chute bags and using secateurs
13.1	Harvesting hygiene		

13.1.1A	The firm/grower shall have a documented hygiene procedure for handling of produce premised on the basis of a risk assessment.	Yes	Documented harvest hygiene risk assessment in place ref MORL.HV.PP.018 which detail of all the risk in harvesting hygiene and how they are mitigated including use of water at intake where avocado is washed off all the soil that may have contaminated them. The risk assessment is supported by harvesting hygiene procedures ref MORL.HV.PP.019 rev 00 that was well implemented
13.1.2A	There shall be a regular risk assessment of the hygiene aspect of the harvesting procedures/operations.	Yes	Documented harvest hygiene risk assessment in place ref MORL.HV.PP.018 which detail of all the risk in harvesting hygiene and how they are mitigated including use of water at intake where avocado is washed off all the soil that may have contaminated them. The latest review of the risk assessment was done dated 28-06-2022
13.1.3A	The containers, harvesting tools and other harvesting equipments that are continuously used must be appropriately cleaned, disinfected and maintained in tandem with the risk assessments. Produce handling containers shall be strictly for the produce and not any other use e.g. chemicals, plant debris, etc. Colour codes, symbols or any other means may be used to distinguish containers for various uses.	Yes	All avocados are harvested in green crates with black crates used as the spacer crates that prevents harvested produce from contamination with the soil pathogens. The

			harvested produce is kept in a holding shed awaiting collection by the truck to the packhouse
13.1.4A	A planned washing program shall ensure that ,harvesting containers such as plastic field buckets or crates that can be easily cleaned are used and are free from contamination	Yes	All crates are washed after delivering the produce to the packhouse and they are washed in Chlorinated water ,with detergent and rinsed with plain water and later sanitized in chlorinated water before drying up. A washing bay that was appropriate had been provided
13.1.5A	Cleaning water shall be free from microbial and, chemical contaminants, and other foreign matter.	Yes	Water was chlorinated and tested as evidenced in water test report detailed in this report. The water was free of microbial, chemical and other contaminants
13.1.6A	Supervision procedures and training programs shall ensure that all workers involved in handling of produce observe personal hygiene. Personal hygiene facilities including field toilets with hand washing facilities shall be provided and kept clean.	Yes	All personal hygiene facilities including toilets, bathrooms and changing rooms were appropriate and maintained in appropriate conditions
13.1.7A	To avoid contamination of produce, the operator shall ensure that field workers involved in handling of fresh produce are in good health and that field workers with communicable diseases are not knowingly assigned duties in fields operations. Employees shall be instructed to report to the operator r if they are suffering from any illness either on arrival for work or during working hours.	Yes	All personnel were medically tested with validity of medical test being upto 21-12-2022 by Rongai Subcounty Public health officer
13.2	Field holding facility		
13.2.1.A	Temporary or mobile holding or grading facilities shall ensure that the produce is handled hygienically. Thorough inspection shall ensure that such areas are well maintained, kept clean and only used for fresh produce. Records of inspection shall be maintained.	Yes	N/A No Field holding facility
13.2.2A	Procedures of handling, storage and stock control of produce and packaging materials shall be done in a manner that will sustain a high status of hygiene and cleanliness. Produce and Packaging materials shall be held in areas protected	Yes	N/A No Field holding facility

	from rodent, insect and other pest ingress.		
13.2.3A	The facility shall be designed to protect the produce and the packaging material from any adverse weather. Packaging material shall be of food grade and of such a design as to protect the produce from any contamination or compromise integrity of the produce.	Yes	N/A No Field holding facility
13.3	Pack house premises		
13.3.1A	Pack houses shall comply with all relevant national laws relating to working conditions including environmental, fire, electrical, mechanical and structural safety. Pack houses shall be in good structural condition. The area around the pack house shall be free from rubbish, unserviceable equipment, weeds etc. The pack house shall not be used for activities not related to packing of produce.	Yes	The packhouse is constructed onsite and has in the farm and has been built by sound concrete materials and the area around the packhouse if fenced off from the rest of the farm and it was free of any unserviceable equipments, weeds, free of rubbish and no activities which are non-related to packhouse operation at the site. The packhouse handle only avocado fruits
13.3.2A	The operator shall, process and pack produce in premises registered by the relevant competent authority. Growers packing and processing their own produce may do so as part of the licensed production process, where such processes are limited to their own produce	Yes	The packhouse has been registered by AFFA as a packhouse serving the fa and has been inspected by KEPHIS (Both farm and packhouse) with the next inspection planned in November after 3 months.
13.3.3	Access to premises shall be restricted to authorized personnel only and signs shall be displayed to that effect.	Yes	Access to the premise is only restricted to authorized persons only and signs are displayed at the entry points
13.5	Design and Construction of pack house		
13.5.1A	Construction of the pack house shall be such as to prevent the entry of domestic animals, insects, birds, rodents, among others. Effective control measures shall be in operation and be fully documented.	Yes	Proofing of insects, rodents has been done with self-closing doors fitted at the packhouse

			unit and the doors had a rubber seal which seals off the facility from entry of birds, Pest, and rodents. A standard mesh has made
13.5.2A	Floors, doors, and wall surfaces shall be made of impervious, non-absorbent, non-toxic, washable materials, which are easy to clean and disinfect. Floors shall be durable and allow easy drainage without leaving wet areas. Windows and doors shall open and close easily.	Yes	Floor was made of epoxy and hence easily cleanable and wall made of smooth concrete finishing
13.5.3A	Ceiling and overhead fixtures shall be designed, constructed and finished to prevent the accumulation of dirt, growth of undesirable moulds, shedding of paint flakes or particles and also reduce condensation.	Yes	No ceiling in the factory and the factory structure was appropriate
13.5.4A	Windows and other openings shall be constructed and finished to prevent the accumulation of dirt. Those that can be opened to the outside environment shall be fitted with insect proof screens of appropriate mesh size.	Yes	Windows are made of easily curved endings and cleanable. No windows in the factory only available in an office area that was next to the packhouse
13.5.5.A	There shall be a glass and hard plastics handling policy to govern their use within the premises whenever they are used	Yes	All the factories had hardened Perspex and were monitored every week with a checklist on hard and brittle plastics in place. Sampled records between week 2 and week 28 of 2022 verified
13.5.6C	Where glass is used, there shall be a form of screening to prevent any broken glass contaminating the produce. All use of glass (windows, lights etc.) shall be recorded and a system of inspection implemented to ensure that any breakages are rectified.	Yes	No use of glass in the facility
13.5.7A	Lighting over inspection, grading and cold store areas shall be adequate to allow effective inspection of produce. All fixtures shall be protected to prevent the risk of broken glass contaminating the produce.	Yes	Adequate lighting provided which was made of shatterproof material and was adequate for use in the facility
13.5.8A	The pack house shall have adequate ventilation in order to provide adequate air circulation and temperature control.	Yes	Adequate ventilation provided in the packhouse and had been screened using a goose wire to prevent entry of

13.5.9A	The height of grading tables and other facilities for work shall be appropriate for the comfort of the workers.	Yes	birds and other flying insect. The packhouse had two flying insect catchers which were serviced by SGS together with the rodent stations with the latest inspection dated 15-10-2022 No Grading tables as the process of grading sorting in sizes and packing was done in the machine as the process if fully automated
13.5.10A	Loading and dispatch areas shall be roofed and proofed so as to prevent the nesting of birds.	Yes	Loading area was roofed and proofed to prevent birds' entry
13.6A	Forklift		·
	Forklifts with internal combustion engines shall not be used in restricted spaces holding produce as they can result in taint of produce. Electric forklifts shall be preferred. Only fully trained operators shall use forklifts.	Yes	An electric forklift which had been serviced on 30-03-2022 was reviewed used. Trained operators used in operating the forklift
13.7A	Incompatible goods		
	All non-food items e.g. cleaning agents, lubricants etc. shall be stored in designated secure areas away from the fresh produce and outside the packhouse. Incompatible fresh produce shall not be stored together to prevent taint, ethylene damage or cross contamination of produce.	Yes	All non-food items including cleaning detergents were stored in a cage where they were locked and had MSDS displayed by the access board. A spillage kit had provided next to the store
13.8	Risk assessment in the pack house process		
	A risk assessment or audit shall be done along the produce process flow and its associated systems. This assessment shall consider not only areas where food safety hazards may occur but also areas where quality aspects of the produce are likely to be affected. This shall include preventing contamination from foreign bodies such as pieces of string, glass, metal, hair, nails, knives, other produce These assessments shall be documented and periodically reviewed. The operator shall have in place a detailed and precise process flow that ensures that every unit or batch of the produce received is clearly marked in a manner that enables the produce to be easily traced from receipt through handling process to dispatch point. Such a system shall be monitored and reviewed periodically for effectiveness.	Yes	A documented HACCP has been done for each step within the packhouse operations and evaluated various forms of possible contamination including physical contamination,

13.8.1	Produce receipt		microbiological contamination, and chemical contamination
13.8.1A	The produce shall be received by trained and competent personnel capable of carrying out independent inspection of it and deciding on whether to accept or reject (with a reason), or, accept with a provision for further sorting. The condition of produce at the time of receipt and delivery shall be documented to indicate unconditional acceptance, further sorting or rejection.	Yes	A trained QC carries out independent inspection at intake against the specification MORL.SPECO.20 and records the quality of each lot of products received in intake record book ref MORL.INT.RE.03 with sampled records between 02-10-2022 and 19-10-2022
13.81.2.4A	Every unit of produce shall be clearly and indelibly marked to identify its source, such that its identification marks cannot be altered, adulterated or obliterated.	Yes	All produce crate delivered had a trace label done at the farm detailing the date, variety, block harvested, kgs, harvesting team, farm inspector
13.8.2A	Operators receiving the fruits and vegetables from out growers shall periodically collect samples for analysis to verify the produce pesticide residue status at receipt stage.	Yes	Samples are collected for each lot delivered to the packhouse
13.8.3A	Records of such analyses shall be maintained confidentially and the necessary authority will take appropriate action where the MRLs are exceeded.	Yes	The produce is subjected to MRL Test with the lost recent report detailed above in this report and was compliant
13.8.4A	The receiving room for the produce shall be adequately lit and equipped with facilities for produce inspection.	Yes	The receiving, grading, sorting, and pacing of avocado was done by a machine before transfer of the packed material to the packhouse
13.9	Produce inspection		
13.9.1A	Although inspection of produce for quality is a continuous process in certain designated areas, inspection shall be mandatory at:	Yes	Inspection of the farm produce was reviewed

	 a) reception at the pack house b) quality-control during processing; c) final quality check when ready for dispatch; d) Loading area. 		done at farm level after harvest, intake to the packing facility, after washing and before drying, Final product after drying, Packing and stored materials in the cold room
13.9.2A	 a) identity of product,, lot/batch number, grower and/or pack house identity, date and packing code; b) essential information such as class, variety and post-harvest treatment; c) NOTE Operators shall provide documented traceability for produce and operations. 	Yes	The final product is packed in a 4kg box with the box bearing details of the product, variety, Lot number, date of packing. No post-harvest treatment done
13.10	Quality control		
13.10.1A	The operator shall have a quality assurance system. Quality control unit shall be within the vicinity of the pack house and shall be equipped with quality control facilities, equipment, procedures, standards and records as required.	Yes	A quality manual with all quality assurance parameters in place and detailing of all quality controls standards that must be verified. Standards and Procedures in relation with quality control were verified in place
13.10.2A	All measuring devices shall have the necessary accuracy as required for inspection purposes. All equipment used for weighing, sizing, temperature monitoring or any other measuring devices shall be calibrated regularly and records maintained.	Yes	No measuring devices with exception of temperature data loggers and temperature probes both for QC and the cold room and were reviewed calibrated by QAS assurance with certificates valid to Sept 2023
13.10.3A	For each daily shipment, samples of the produce shall be kept and their quality and condition assessed and recorded on a daily basis for at least 2 days beyond anticipated shelf life of the product. Records shall be kept for a specified period.	Yes	A sample is retained in the refrigerator of each consignment sent out for analysis and verified on

			she life against what was sold and dispatched
13.10.4A	Quality systems shall be audited at least annually or more frequently base on risk assessment The audit shall be documented and made available for inspection by recognized institutions when required .	Yes	Audits were reviewed planned at least every quarter when there is production, the latest audit was reviewed done dated 30 th Sept 2022 and related to production, Quality assurance system, utilities, farm operation and non-conformities raised were verified closed
13.10.5A	The policy and procedure of addressing customer complaints shall be documented and implemented. All customer complaints shall be investigated and action taken as appropriate, to prevent recurrence.	Yes	A procedure on how to handle customer complaints had been documented and detailed above in this report. There was no complaint received yet
13.10.6A	Records of data showing non-compliance with the quality requirements specified in the quality system shall be followed up with a written account of corrective measures taken.	Yes	Records of quality inspection were documented, and any non-compliance was verified done in a corrective action plan with correction and corrective actions detailed
13.10.7A	Operators shall ensure personal hygiene of produce handlers.	Yes	All persons and All operators are required to wash hands before entry to packhouse. Appropriate handwash facility was reviewed provided with adequate water, soap, and a dryer. The taps were foot operated
13.11	Produce handling		

13.11.1A	Produce at different stages of preparation shall be kept separate. The floor layout shall allow for a smooth flow of produce from reception to finishing area, with adequate separation of raw materials from finished products. Waste materials shall be removed regularly and placed in a designated area. Produce shall be handled in specially designed and equipped facilities of appropriate and recognized standard .Products that are to be consumed raw shall be handled with high care to avoid any contamination.	Yes	A documented floor layout that ensures that product does not mix was in place and well implemented. Designated area for raw material receiving final product storage and dispatch were evident
13.11.2A	Produce shall normally be processed on a "First In, First Out" (FIFO) basis unless there are quality, maturity or hygiene attributes identified for particular batches on receipt that indicate otherwise. Where produce is processed on a non-FIFO basis, the reasons for it shall be documented Produce traceability shall be ensured throughout the process chain and records maintained.	Yes	All products were processed and given batch numbers as they come into the packhouse and were labelled with appropriate codes used for traceability to the boxes. The first in first out system was reviewed practiced
13.12	Pack house hygiene		
13.12.1A	Pack house operations shall be geared towards implementing quality management systems and good hygiene practices (GHP).	Yes	The packhouse was clean and hygienic and maintained to standards. Cleaning logs were verified documented with records between 13-07-2022 and 19-10-2022 sampled.
13.12.2A	Routine and general cleaning procedures for the facilities and equipment shall be documented, monitored and evaluated for effectiveness. 13.12.8A Pack house cleaning equipment shall be designated for that purpose and coded.	Yes	Cleaning logs were verified documented with records between 13-07- 2022 and 19-10-2022 sampled. The logs were evaluated by the packhouse supervisor
13.12.3A	There shall be a documented and up to date risk assessment that covers the hygiene aspects of the produce handling operation.	Yes	Documented packhouse hygiene risk assessment that evaluates all possible vulnerabilities in relation to hygiene and puts in place appropriate

			controls such as cleaning surfaces using the right dosage of detergents, verifying the effectiveness of clean surface
13.12.4A	A hygiene procedure shall be implemented on the basis of the risk assessments.	Yes	Documented packhouse hygiene procedure MORL, PP.HY.09 in place rev 01 and was well implemented
13.12.5A	The pack house shall have provision for clean toilets, appropriate waste disposal bins and hand washing facilities in the vicinity of their place of work.	Yes	Appropriate clean toilets provided and were regularly inspected during working hours and records documented
13.12.6A	Work table tops, knives and cutting boards shall be of stainless metal and plastic construction only. These shall be maintained in sound condition and kept clean at all times.	Yes	All product contact surfaces were made of stainless steel and were maintained in sound conditions
13.12.7A	Basic instructions on hygiene shall be appropriately displayed in the pack house.	Yes	Basic hygiene instructions posted in appropriate Swahili and English language by the entry to the packhouse
13.13.1	Health status		
13.13.1.1	Personnel working in a pack house for edible produce shall have full medical check-ups once every six months and the records of the examination shall be well documented.	Yes	All personnel had valid medical certificates done by Rongai subcounty public health officer dated 12-09-2022 and valid to Feb 2023
13.13.1.2	People known, or suspected, to be suffering from, or to be a carrier of a disease or illness likely to be transmitted through produce, should not be allowed to enter any food handling area if there is a likelihood of their contaminating produce. Such an affected person—shall only be allowed to work on fresh produce after a medical officer clears their condition and certifies them as fit. Any person so affected should immediately report illness or symptoms of illness to the management.	Yes	All personnel are evaluated of having any known disease that can be transmitted. All visitors are screed using the visitor's questionnaire where they can declare

13.13.1.3	Medical examination of a produce handler should be carried out if clinically or epidemiologically indicated.	Yes	their health status. Workers are encouraged to report any illness before start of work All personnel had valid medical certificates done by Rongai subcounty public health officer dated 12-09-2022 and valid to Feb 2023
13.13.4	Personal behavior		valid to reb 2023
	People engaged in produce handling activities should refrain from behavior which could result in contamination of produce, for example: i)smoking; ii)spitting; iii) chewing or eating; iv) Sneezing or coughing over unprotected produce. Personal effects such as jewellery, watches, pins or other items should not be worn or brought into food handling areas if they pose a threat to the safety and suitability of produce.	Yes	Basic hygiene instructions posted in appropriate Swahili and English language by the entry to the packhouse and entry to the farm and included the dos and don'ts while at the site.eg the farm was a restricted no smoking zone
13.13.5	VISITORS		
	Visitors to produce manufacturing, processing or handling areas should, where appropriate, wear protective clothing and adhere to the other personal hygiene provisions in this section. Access to post-harvest handling areas shall be restricted. No unauthorized person shall be allowed access to the pack house. Authorized visitors entering the pack house shall only be allowed in after briefing on the importance of hygiene and shall be provided with appropriate protective clothing and adhere to the other personal hygiene provisions in this section. A record of visitors to the pack house shall be maintained.	Yes	Visitors were required to declare their health status and were required to be in full gear appropriate for the facility and this was provided by the organization
13.14	Post-harvest washing		
13.14.1A	Water for washing produce shall be potable including recycled Water.	Yes	Washing is done with plain water to remove solid particles, and this was reviewed done by water which is treated using chlorine and residual chlorine monitored daily with records sampled between 12-06-2022 and 23-10-22

			sampled. No use of recycled water
13.14.2A	Based upon risk assessments, water for post-harvest washing shall be analysed on a regular basis by a competent laboratory to ascertain its freedom from microbial, chemical and physical contaminants.	Yes	Post-harvest washing risk assessment in place rev 02 dated Feb 2022 and water was analyzed by crop nutritional laboratories with the latest report detailed in the report above and was compliant to the requirements of drinking water specification KS EAS 12:2018
13.14.3B	All waste water shall, where possible, be re-cycled through constructed wetlands.	Yes	Wastewater was disposed off in a soak pit located at the site and was used in watering flower beds
13.14.4A	Records of data showing non-conformance with the quality requirements specified in relevant standards shall be followed up with a written account of corrective measures taken.	Yes	Records in place in case of any non-compliance on how the organization would document and develop a corrective action plan. Reports reviewed were compliant
13.15	Post-harvest treatments		-
13.15.1A	Use of post-harvest treatments shall be justified and documented Use of post-harvest treatments shall be justified and documented.	Yes	No post-harvest treatments done
13.15.2A	Use of post-harvest chemicals shall be strictly controlled and all such cases shall be recorded and used in compliance with the product label requirements. Permitted post-harvest chemicals and food grade waxes shall only be used if no alternative exists to maintain good produce quality.	Yes	No post-harvest treatments done
13.15.3	There shall be a record of all the post-harvest treatment products in use. All post-harvest treatment products used shall be approved by competent authority.	Yes	No post-harvest treatments done
13.15.4A	The technically responsible persons for post-harvest treatments shall be one of demonstrable competence attained through training.	Yes	No post-harvest treatments done
13.15.5A	The batch/lot of treated produce shall be appropriately documented as is the geographical area, the name or reference of the farm or produce handling site where the treatment was undertaken.	Yes	No post-harvest treatments done
13.15.6A	Date of application, type of treatment used for product application, the trade name, active ingredients of the products used/applied, volume or weight shall be recorded in the post-harvest crop protection products application records. The operator name shall also be recorded in the same records.	Yes	No post-harvest treatments done

13.17	Cold chain Management		
13.17.1A	The operator shall ensure Cold chain facilities that are of satisfactory structural conditions and of adequate cleanliness.	Yes	The cold rooms were appropriate and were made of PET Plastic material on the wall which was easily cleanable.
13.17.2A	Produce should be maintained under recommended temperature and humidity at all times.	Yes	Produce was kept at temperatures of below 4 degrees Celsius and monitored every 2 hours with records in place for the monitoring process
13.17.3A	Harvested produce shall be moved from the field into cool, preferably refrigerated conditions as quickly as possible, ideally within 2 hours of harvest. Produce temperature shall be reduced uniformly as fast as possible	Yes	All the farm produce harvested in the farm was moved to the packhouse within 30 minutes to eliminate buildup of field heat and hence this ensures the product quality was kept as required
13.17.4B	Pre-coolers must be maintained in accordance with the manufacturer's recommendations. The cold store doors shall be capable of being opened from the inside while the door screens shall permit vehicle loading with minimum increase in produce temperature	Yes	Doors in the cold room self-sealing and were constructed with appropriate fabric materials. Cold-room was serviced by the manufacture and was newly installed in the year
13.17.5A	The cold stores shall be cleaned, disinfected, and, if found necessary through risk assessment, fumigated on a regular basis and records maintained	Yes	Cold rooms are cleaned weekly after product dispatch and before loading any more products and dis infected using chlorine-based sanitizer which is applied before rinsing with water

13.17.6A	Transportation system shall include facilities for maintaining produce temperature at the recommended level. Records shall be kept at every phase of dispatch. Refrigerated transport is highly recommended.	Yes	The customers come to pick the products using refrigerated trucks from the dispatch bay and hence oversaw maintaining the cold chain for the product during transit
13.18	Produce Transport		
13.18.1A.	The transport vessel shall be cleaned, disinfected, and, if found to be necessary by risk assessment, fumigated on a regular basis and records maintained.	Yes	The customers come to pick the products using refrigerated trucks from the dispatch bay and hence oversaw maintaining the cold chain for the product during transit. The farm transport equipment was reviewed cleaned and verified before going to pick the product from the farm to the packhouse
13.18.2A	Transportation of produce shall be done in such a manner so as to avoid mechanical damage due to bruising or stacking.	Yes	The customers come to pick the products using refrigerated trucks from the dispatch bay and hence oversaw maintaining the cold chain for the product during transit. Farm produce to the factory was reviewed transported in crates

			and he crates were made of plastic material
13.19	Temperature monitoring		
13.19.1A	Equipment for temperature measurement with the required calibration status shall be in place to provide regular monitoring Records of all monitoring results and any corrective actions shall be maintained.	Yes	All the temperature monitoring devices were reviewed calibrated appropriately by QAS with calibration records reviewed detailed in the report above
13.19.2A	Produce temperature shall be monitored based on recommended temperatures, and situations outside normal holding temperatures shall be reacted to and corrected as fast as possible. Records shall be kept of all of the monitoring results and any corrective actions	Yes	Produce temperatures at intake, during processing and storage are recorded as detailed out in the report above including sampled dates
13.19.3A	Produce handlers such as drivers and freight forwarders shall receive written instructions on maintaining temperature levels.	Yes	Instructions are issued to the transporter and the customer who oversee transporting the material
13.20	Packaging		
13.20.1A	Packaging material for food shall be of food grade quality and of such a design as to protect the produce from any contamination. Packaging material shall ensure product quality, safety and integrity and shall be in conformance to the Kenya Standards for Packaging of produce.	Yes	All avocados were packed in corrugated boxes which were appropriate for use in a food factory
13.20.2A	Where used, cartons shall be assembled correctly with tabs fully locked in position. No staples shall be used in produce packaging. The pre-cooling vents shall be correctly aligned.	Yes	No use of staples as the joints for the cartons were done using a food grade adhesive
13.20.3C	Where required, fumigation or heat treatment of pallets and containers shall be done in accordance with the relevant legislation.	Yes	No pallets use as the organization uses plastic spacers
13.20.4A	Operators shall ensure packaging and other materials in contact with the produce do not cause contamination.	Yes	All avocados were packed in corrugated boxes which were appropriate for use in a food factory
13.20.5A	Procedures of storage and stock control of packaging materials shall be done in a manner that will sustain a high status of hygiene and cleanliness. Packaging material shall be held in areas protected from rodent, insect and other	Yes	Stock controls were done and Fifo system followed for the product and

	pests. The facility shall be designed to protect the packaging material from any adverse weather.		packaging materials
13.20.6A	Whilst adhering to their customer's requirements, management shall be committed to the use of environmentally friendly packaging materials that should be in conformance to the corresponding legal provisions.	Yes	The materials were sourced from environmentally friendly sources and the suppliers were certified to schemes on the same e.g., FSC
13.20.7B	To avoid produce damage, proper stacking and securing of packaged produce must be ensured through written instructions to the value chain handlers including but not limited to transporters, loaders, consolidators, and freight forwarders.	Yes	The products were stacked up to a height of 2.5 m and a tape was in place to measure the height of the pallet
13.20.8A	Where cartons are used; they shall be assembled correctly with tabs fully locked in position. Proper stacking of cartons shall be ensured to avoid produce damage.	Yes	Proper stacking was reviewed
13.20.9A	Packing material hazard control - Safety hazards associated with the packaging materials must be included in the risk assessment and measures be put in place for the control of each identified hazard. The risk assessment must be documented.	Yes	No hazards were presented by the packaging material
13.21A	Cleaning materials		
13.21A	Materials used for cleaning shall be those approved for use and shall be stored and maintained in a designated secure area away from produce and other non-cleaning chemicals. Adequate facilities shall be provided for cleaning and disinfecting of work tools and equipment. Cleaning chemicals used for food contact surfaces shall be food grade.	Yes	A detergents store was provided and was adequate and was stocked with cleaning detergents. A bin card system was in place to monitor stocks. All detergents were covered with a certificate of analysis and a material safety data sheet
14	WORKER HEALTH, SAFETY AND WELFARE		
14.1	Health		
14.1.1A	Health requirements should be followed to ensure that personnel who come directly into contact with produce during or after harvesting are not likely to contaminate them. Visitors should where appropriate, wear protective clothing and adhere to other hygiene provisions in this code.	Yes	Documented health and safety procedures in place that detail on farm safety and workers safety and included mapping of the appropriate P.P.E for each type of role.
14.1.2A	Potable water that complies with the set standards shall be available to staff at all times. Containers or outlets of	Yes	Drinking water was provided which was

	water unsuitable for drinking shall be appropriately marked.		purified water that had been treated and was analyzed by crop nuts as detailed in the above report and was compliant to the requirements of portable water specification KS EAS 12:2018.The drinking water point was appropriately labelled
14.1.3A	The work station shall be provided with sufficiently well stocked first aid kits and have personnel trained in first aid on hand to deal with emergencies.	Yes	Adequate first aid kits provided at the gate, in the office, near chemical/fertilizer store and one portable first aid box that was used during farm activities e.g., weeding
14.1.4A	Written accident and emergency procedures on how to deal with serious injuries requiring medical attention shall be displayed clearly, permanently and prominently with contact person telephone number or institution. It shall include basic steps of primary accidents.	Yes	Written procedures in place on how to deal with injuries and illnesses was in place as well as how return to work is done. There was a log to records all incidences and accidents however there was no accident/incident within the period of review Jan 2022 to Date
14.1.5A	Workers changing rooms, eating and resting areas together with sufficient clean toilets, hand washing facilities and food grade soap shall be provided.	Yes	Appropriate changing room provided with lockers and an appropriate eating facility was also reviewed provided. Appropriate number of toilet(24) were provided and were separated based on gender with ladies having more than men. All toilets

			were provided away fron production areas and were provided with adequate water and soap
14.1.6C	The operator shall undertake a survey of health conditions of the personnel in accordance with the operator health policy.	Yes	A self-declaration was reviewed made as there was no hazardous role within the farm which would require examinations
14.1.7A	The operator shall promote safe and hygienic work culture that establishes controls to address and minimize risks identified.	Yes	Safe and hygienic workin environment were reviewed provided
14.2	Safety measures		
	Workers' Representatives and Management shall establish and implement a coherent policy together for Occupational Safety, Health and Working Environment that conforms to the National legislations. This policy should also include issues relating to the proper handling of pesticides and chemicals.	Yes	Documented occupational health and safety policy in place rev 01 dated 21-05-2022 and included how to make th farm a safe working environment and how to handle pesticides and other chemicals
14.2.1A	Machinery used shall be suitable for its purpose, equipped with operational safety devices with regular inspections and maintenance carried out and records maintained. Essential equipment shall be made available.	Yes	Machinery and equipment's were serviced and inspected a per schedule plan MORLA.PP.SCH.01 which had been done for the year 2022
14.2.2A	Employees shall be trained on safety use of equipment. Training records shall be kept and available for audit.	Yes	Employees are trained of safe operation of machines and records reviewed e.g., 12-04-20 Reviewed training o safe operation of the forklift,090-07-2022 Safe Loading and unloading of the safe control of the s
			fruits from the vehicle

14.2.4A	regularly maintained. Fire alarms shall be fitted to each floor above the exit and there shall be evidence of evacuation drills. There shall be clearly marked emergency exits, which shall be fitted with fire safety break locks or remain unlocked during working hours.	Yes		reviewed appropriate and were services by an expert as detailed in the report above. They were placed in appropriate height Emergency exits were provided in the packhouse and well labelled using luminating material as emergency
14.2.5A	Relevant safety rules and precautionary safety measures shall be clearly displayed. The emergency plan and accident procedures shall be availed to all employees and displayed in common notice-boards. Sign-posts for risk prone areas shall be displayed appropriately.		NO	exits/fire exits Safety rules and precautionary safety measures were in place. An emergency plan was in place with relevant contacts in case of emergency Though the operator had an appropriate water harvesting facility onsite in form of a dam, it was noted that the dam did not have appropriate features in relation to personnel safety including signages, a physical barrier and adequate number of life floatation devices in the dam
14.3	Worker welfare			
	The operator shall ensure that food provided to workers meets public and hygiene regulations. The operator shall provide safety and hygiene information on use of common areas such as canteen, bathroom, changing room, parking lots among others.	Yes		The farm had been inspected by public health including the packhouse and the eating facility and had been

			issued with a valid license dated valid to 31-12-2022 by Nakuru County Government(Rongai Subcounty public health office) Workers had valid medical certificates valid to 21-12-2022 by Rongai Subcounty Public Health Office
14.3.1 A	The operator shall guarantee hygiene facilities and / or sanitary units. Workers shall have ready access to flush toilets or waste water treatment facility latrines which shall be separate for both sexes and adequate to their numbers. Waste water treatment facility latrines shall not be located on riparian land or near water sources.	Yes	The sanitary bins were collected by an expert with contract valid to Dec 2022 and was collected with the latest collection dated 22-10-2022.Adequate number of toilets in place which were not located near any water source
14.3.2A	Adequate hand washing facilities shall be conveniently accessible to the toilet facilities and be kept in a clean and hygienic condition. Signs to remind workers to wash their hands after toilet use shall be in place.	Yes	Adequate handwash facility provided with water and soap provided
14.3.3C	Where possible, suitable rest rooms and a canteen with cooking, eating and storage facilities may be provided by the employer. The eating and storage facilities shall be separated from the working areas.	Yes	Suitable resting and easting areas were provided
14.3.4B	Employees whose work entails standing for long periods must be provided with facilities for sitting to enable them to take periods of rest.	Yes	Rest periods were provided within breaktimes where workers would take a rest in designated areas
14.3.5C	Operators may provide occupational health and safety training to the workers on the farm in addition to family planning, first aid, basic health care, hygiene, accident prevention, preventative medicine and HIV/AIDS awareness.	Yes	Training on occupational health and safety in place done in April 2021 and next planned in the year with a fully functional health and safety committee
14.3.6B	Employees working with machinery or processes likely to cause bodily injury must be fully instructed as to the	Yes	Instruction's training was done for all machine

	possible dangers and the precautions to be observed.		operators .e.g., Cold room training for operators dated 01-01-022 and instructions posted by the machine
14.3.7A	All machinery shall be fully guarded where applicable and well maintained Records shall be kept of all machinery maintenance and servicing.	Yes	All machineries were well maintained
14.3.8A	Precautions shall include safe installation and use of electricity and gas, special instructions on smoking and the disposal of cigarette butts, provision and regular servicing of firefighting equipment and regular fire drills for employees.	Yes	All electrical installation were reviewed appropriately done
14.3.9A	 a) Signs shall be displayed with regard to the following requirements. All sores and cuts shall be adequately covered with waterproof dressing: b) hand washing for sanitary facilities with soap, hot air or paper (not cotton) towels shall be available; c) no powder shall be used on hands as this may contaminate produce; d) finger nails shall be clipped short; e) protective clothing including overalls, head covering which shall contain all hair shall be worn at all times in packing areas; f) Personal protective equipment. shall be regularly laundered and kept in a clean and well-maintained condition and in an area separate from animals and separate from children's nappies g) smoking, eating and drinking shall be prohibited in all food handling areas; h) personnel shall be advised to keep personal belongings away from production lines and that: there should be; i. no false nails, eye lashes or hair pieces; ii. no nail varnish; iii. no watches or jewelry except single plain band wedding ring; iv. no chewing gum; and v. No open shoes shall be allowed in the pack house. Only closed shoes shall be allowed. 	Yes	Signages were appropriate and posted at relevant places within the organization as detailed in the report e.g Basic hygiene training Basic hygiene training dated 26-08-2022 covering all staff Basic GMP Rules were reviewed posted on relevant strategic areas within the organization
15.0	LABOUR, EMPLOYMENT AND SOCIAL ISSUES		
15.1	Wages		

15.1.1A	All employees must be paid at the agreed time and in full or by some mutually acceptable monetary means. Information regarding wages shall be made available to employees in a detailed and understandable form. The wages shall meet the legal or industry minimum whichever is higher.	Yes	All workers were paid all their wages at the end of the month and advance system mid-month and the workers were provided with pay slips that detail out their pay and any deductions done
15.1.2	To ensure the welfare of workers, all operators shall abide by the regulation of wages and conditions of Employment Act, and any other laws which affect the welfare of workers	Yes	All regulation and requirements on condition of employment were complied to including provision of P.P.E,Salary payment which was above the minimum government wage requirement, provision of a safe working environment and no un authorized deduction made on payment
15.1.3A	No deductions of any sort other than the statutory requirements may be made from employee's wages without mutual agreement.	Yes	Only NHIF,NSSF and PAYE (Where applicable) were deducted
10.1.4A	Workers must be selected for a particular job and paid in accordance with their ability to carry out specific tasks. All workers shall receive equal pay for equal work. Hiring, compensation and access to benefits must be on the basis of ability and job responsibilities.	Yes	All workers were remunerated based and in accordance with the specific tasks they are carrying out
15.1.5A	There must be clear and fair guidelines on payments of bonuses and incentives and these shall be administered fairly and communicated transparently to all staff concerned.	Yes	All payments, incentives and promotions were seen administered fairly
15.1.6A	Where overtime is required due to seasonal demands, payment must be made as per the legal requirement. Agreed and stipulated mid-day and work breaks shall be observed.	Yes	There were no overtimes worked in the review period between March 2022 and October 2022 however the organization had provided that incase of overtime this shall be paid on premiums

15.1.7A	Employers shall make the mandatory deductions and remit monthly contributions in accordance with legal provisions.	Yes	All mandatory and statutory deductions were made including NHIF,NSSF,PAYE
15.1.8C	The employer may provide reasonable housing accommodation with adequate clean water, washing and toilet facilities for each of his employees within easy access; or the employer may pay to the employee such a sum as housing allowance in addition to wages or salary as per legal or industry minimum.	Yes	No accommodation provided however workers were provided with housing allowance
15.2	Staff recruitment and promotions		
15.2.1A	Staff shall be recruited and promoted based on their ability to perform work.	Yes	Staff were recruited based on merit and based on the qualifications and the need by the organization
15.2.2A	Female staff, interns and apprentices shall not be employed in areas identified as hazardous as per the farm / company risk assessment. Interns and apprentices shall be supervised.	Yes	No female or intern student was employed in hazardous areas
15.2.3 A	Expectant mothers shall not be dismissed, discriminated against or expected to undertake work that may harm the mother or the unborn child.	Yes	No discrimination, termination of expulsion of pregnant mothers
15.3	Induction and training		
15.3.1A	All personnel shall receive basic and relevant induction, training and orientation.	Yes	All staff including any contactor were fully inducted and the induction included training on site hygiene, site health and safety standards
15.3.2A	All Personnel shall receive job specific training to allow them to work safely and fulfill their roles and responsibilities.	Yes	All personnel on specific tasks were trained on those specific tasks with records retained
15.4	Work contracts		
15.4.1A	All employees, including those sub-contracted, shall be given a written, legally binding employment contract signed by both parties detailing their obligations, rights and entitlements. Employees shall be given their individual job descriptions, terms and conditions. Subsequent changes in terms and conditions shall be negotiated and	Yes	All personnel had a contract spelling out of the role, specific tasks, the conditions including

	communicated to employees.		terms for the role
15.4.2B	Work contracts may be executed for a fixed term, for a period of time to complete a task or for an indefinite period to accomplish an occasional task. Tasks allocated per day shall be based on what can be reasonably completed by an averagely experienced worker on a standard working day.	Yes	Tasks allocated and the targets set were fully achieved and were reasonable targets
15.4.3A	Use of fixed-term contracts or "casual labour" to evade labour or NSSF laws shall be avoided.	Yes	The fruits were seasonal and hence some of the operations were seasona based on the type of products handled
15.5	Work hours and leave days		
15.5.1B	Employers must provide transport or transport allowance when employees work outside normal working hours or	yes	Employees live within the
	when public transport is not available and the employee does not live within easy or safe walking distance of the		neighborhood of the farm
	workplace.		
15.5.2A	In every period of seven (7) days a period of rest comprising at least one rest day (paid) must be provided.	Yes	No work on Sunday and all persons have this as a paid rest day
15.5.3A	All permanent and contract staff shall be entitled to minimum 21 annual leave days as per the Employment Act. The leave above is in addition to all public holidays, weekly rest days and any sick leave taken by an employee. The leave must be taken at times mutually agreed between the employer and employee.	Yes	All permanent staff were reviewed to have 21 days leave while those on contract were paid in lieu for the leave days accrued. They also had 21 days broken down into
15.4B	All seasonal workers/sub-contractors must be entitled to leave on a pro-rata basis.	Yes	months on prorate basis All seasonal workers accrued leave on pro rata basis
15.5B	An employee must be entitled to sick leave and this is only to be granted on production of a certified letter of	Yes	All persons were entitling
	incapacity signed by a recognized medical practitioner as per the employment act CAP 226.		to 30 days sick leave on
			full pay and 30 days sick leave on half pay
15.6	Expecting and Nursing Mothers		
15.6.1A	Women shall be not discriminated against during ante or post-natal periods with regard to recruitment, selection or	Yes	No discrimination for
	termination of a particular job.		expectant or nursing mothers
15.6.2A	Expectant mothers shall be given due consideration and be assigned duties appropriate to their physical condition.	Yes	All expectant or nursing

	Where risk is identified, action shall be taken to minimize or eliminate the danger; In particular, pregnant women shall not come into contact with pesticides or dangerous chemicals.		mothers were given roles which were not stramineous, and which could not endanger their life and that of the baby
15.6.3B	There shall be safe facilities for nursing mothers to feed infants and a caretaker to keep the children while mothers are working. Extra time shall be given to nursing mothers to feed their infants.	Yes	All nursing mothers were given 30 min break to go and do breastfeeding. Some opted to finish work earlier than the rest
15.7	Termination		
15.7.1A	Each farm /company should have legally validated internal regulations of working and labour conditions, in which should include, among others, proper regulation of warnings and procedure for dismissals.	Yes	All workers had valid contracts spelling out on terms and conditions. A HR Manual was in place detailing on all working condition and regulations including grievances, disciplinary, recruitment, termination, staff development etc.
15.7.2A	Gross misconduct as set out in the Employment Act, shall be grounds for summary dismissal. The termination of work contract shall be formalized in accordance with the law.	Yes	A HR Manual was in place detailing on all working condition and regulations including grievances, disciplinary, recruitment, termination, staff development etc. No termination had been done on account of gross misconduct
15.8	Workman's compensation		
15.8.1A	Any member of the workforce who is injured in the course of his work shall be entitled to compensation in accordance with the WIBA 2007.	Yes	All workers were insured against WIBA with the policy valid to May 2023
15.8.2A	Compensation claimed shall be disallowed if it is proved that the injury was attributable to the serious and willful misconduct of the employee.	Yes	No injuries reported yet as safety was taken keenly within the

15.9 15.9.1 B	Freedom of association and participation Workers have the right with regard to the national law to establish and to join labour unions of their own choice, without prior permission. Where no unions are in place workers have a right to form a workers welfare committee.	Yes	Workers are fre	
15.9.1 B		Yes	Workers are fre	
			associate, and the organization had documented an appropriate polifreedom of associate and for representation a wish. The worken not under any Chowever they have their own interrowelfare commit engaged manag various issues	he d icy on ociation nitment rs to free orm as they ers were CBA ad forme nal farm tee whic
15.9.2C	Workers representatives will not be subjected to discrimination and will have access to all workplaces necessary to carry out their representation functions.	Yes	Worker's repre in the welfare c were democe elected and w subjected to an discrimination their represe	committe ratically vere not ny form o n due to
15.9.3C	The operator shall provide assistance to facilitate workers committees /union.	Yes	The welfare con were provided within working execute their ro provided with to on how to unde representation (08-2021	nmittee with time hours to le, were rainings ertake fa
15.9.4C	Workers committee/union shall participate in collective bargaining.	Yes	No CBA howeve organization do hinder any work joining a trade u	es not ker from
15.9.5C	Where a collective bargaining is negotiated it shall be in accordance with the labour institutions act 2007 and labour	Yes	No CBA howeve	r the

	relations act 2007.		hinder any worker from joining a trade union
15.10	Grievance and disciplinary procedures		
15.10.1A	All workers shall have the right to be heard on matters relating to contractual terms, dismissals and general welfare. The management in collaboration with the workers' representatives shall be required to establish and implement a coherent policy with regard to labour and social issues.	Yes	Documented grievance and disciplinary procedures detailed in the HR Manual that guide on all human resources aspect onsite.
15.10.2A	Clear written firm rules, grievance and disciplinary procedures shall be developed; implemented, communicated, explained to the workers and be accepted by all parties involved.	Yes	The grievances and disciplinary procedures were well documented, displayed and given also to workers welfare reps
15.10.3A	Complaints regarding labour and working conditions shall be handled as per the firm grievance handling procedure.	Yes	Any labour related complaint was handles in accordance with this requirement however there was no labour related complaint that had been raised
15.10.4A	Employers shall provide a formal procedure for solving disputes in the workplace within a specified time frame.	Yes	The Grievance procedure detailed out on how to handle disputes and resolve them including all available channels
15.11	Forced labour		
15.11.1A	The operator shall not make use of forced labour or coerce anyone to work against his/her will.	Yes	No forced labour of prison labour onsite and workers are free to leave after work
15.11.2A	Workers shall not be required to lodge or deposit their original identity papers with their employer.	Yes	No original documents are in the custody of the employer
15.11.3A	The workers shall decide to join and leave the company on personal and voluntary basis.	Yes	Workers are free to join and leave the company as they wish and on voluntary grounds
15.12	Discrimination / Harassment		

15.12.1A.	The operator shall not engage in or support discrimination, intimidation or coercion in any form based on ethnic origin, religion, gender, union membership or political affiliation.	Yes	No discrimination in place. A policy to that effect has been documented and signed by the MD that detail that the organization does not tolerate any form of discrimination
15.12.2A	Physical harassment, corporal punishment and/or mental / psychological oppression or torture, sexual harassment and verbal abuse, shall not be tolerated and the operator shall ensure that measures are in place to prevent such practices. Deduction of wages as disciplinary measure is not acceptable.	Yes	No cases of physical harassment, intimidation of any other firm of physical oppression was noted. The workers get their full pay and only have statutory deduction done only
15.12.3A	Workers shall be selected and hired in accordance with their ability to carry out their tasks. No distinction shall be made on the basis of race, gender, age, religion, nationality, physical disability, ethnic and social origin, marital status, union membership or political opinion or affiliation. Policy on harassment and "equal opportunity" in the work place shall be developed and implemented.	Yes	All workers were recruited, allocated work, trained and developed equally with no form of discrimination practiced
15.12.4A	Employees shall also have access to training on equal terms.	Yes	All employees have equal opportunities while onsite and this was confirmed detailed in the HR manual. All workers were trained on relevant appropriate trainings in relation to their roles
15.13	Child labor/minors		
15.13.1A	No children (persons under 18 years of age) shall be employed for any duty or task whether gainfully or otherwise in the workplace. Exceptions may be made in smallholder operations where young family members may help out on the farm. Work that is likely to jeopardize the health, physical or mental development shall not be carried out by persons less than 18 years of age.	Yes	No use of child labour. All must be 18 years, and each is recruited with a valid original national ID
15.13.2A	Work must not restrict educational opportunities for children.	Yes	No use of child labour. All must be 18 years, and

			each is recruited with a valid original national ID
15.14	OUT-GROWERS/ OUT GROWER ASSOCIATIONS / SUBCONTRACTORS		
15.14.1A	Operators shall formulate and implement a fair purchasing policy with their out growers.	Yes	Not applicable. No out growers in the site
15.14.2A	There shall be written, legally binding agreements between the operators and all out-growers covering product, volumes, frequencies of collection, pricing, grades and obligations.	Yes	Not applicable. No out growers in the site
15.14.3B	The operator must take responsibility for providing full technical advice where such need is perceived to out-growers prior to starting crop production.	Yes	Not applicable. No out growers in the site
15.14.4B	Arrangements for deductions from final payments made for training and supply of other inputs must be clearly specified in written form before these services are provided.	Yes	Not applicable. No out growers in the site
15.14.5A	The operator shall ensure that out-growers are aware of, and implement the relevant principles and requirements of this code of practice.	Yes	Not applicable. No out growers in the site
15.14.6B	The buyer must be able to justify the pricing policy regarding the out-growers/Associations.	Yes	Not applicable. No out growers in the site
15.14.7B	All out-growers must be paid in cash or by a mutually agreed monetary arrangement and be supported with proper and adequate documentation.	Yes	Not applicable. No out growers in the site
15.14.8.B	A firm shall be responsible for its operations including contracted activities conducted by its subcontractors.	Yes	Not applicable. No out growers in the site
15.14.9A	Subcontractors working on farm / company site shall be briefed on farm occupational safety and health procedures.	Yes	Not applicable. No out growers in the site
15.15	Visitors		
15.15.1C	All visits by non-company personnel may be recorded in a visitor's book or similar register.	Yes	All visitors are logged in the visitors' book and recorded with dates, time, visitors name, signature and clearance sought by the security guard before entering the facility
15.15.2C	Visitors may be accompanied at all times by a company representative.	Yes	All visitors are accompanied while onsite by the host/manager and they are inducted on how to behave while onsite

15.15.3A	Visitors shall be provided with suitable protective clothing or equipment when entering areas where they might be exposed to hazardous or injurious conditions.	Yes	Appropriate white dustcoats are provided to all visitors while accessing the site
15.16	Records Records and documentation to be kept in addition to those required by the laws shall include:	Yes	All records are kept for a
15.10.1	a) a record of work contracts for permanent and seasonal workers; b) a record of all the daily rolls for all casual workers; c) A record of all the monetary receipts in accordance with the pay roll and any receipts of payment of any kind.		minimum of 2 years as per the documented procedure on documents and records control. For documents such as purchase documents required by law are kept in line with the legal requirement of 7 years. The retention and disposal of documents has been detailed out in the report ref MORL.REC.01 Records reviewed include Records of daily activities and the workers onsite that day Records of crop protection products to be done e.g., Reviewed records between 01-08-2022 and 19-08-2022 when application stopped Scouting records reviewed Aug and Sept 2022 Records of weeding

			activities Harvest records Grading records reviewed Oct 2022
16	Environmental management		
16.1	Environmental impact assessment		
16.1.1A	Environmental impact assessment and licensing to determine the impact of the intended operations on the environment shall precede the activity where applicable.	Yes	Farm environmental impact assessment has been done by an expert with all potential impacts mapped in the EIA and all mitigations controls for the farming activities detailed in the report. Report done by Lead Expert NEMA/EIA/427
16.1.2B	The operator must have demonstrable competence with regard to minimizing the potential negative impacts such as nutrient loss of the farming activity on the environment.	Yes	The farm has picked all potential impacts and detailed out a farming activity impact assessment control plan 2020-2022 with impacts and appropriate actions detailed with regards to environment. Some of the planned actions include No farming of riparian land and no activities onsite that would harm beneficial insects, Conservation of flora to be done by planting trees and ensuring that the hedge crop is grass
16.1.3A	There shall be visible and documented initiatives to support environmental conservation schemes.	Yes	Reviewed onsite include an apiary where the farm has kept bees and

			beehives, hedge crops of grass and indigenous trees along the barriers between the rivers and the orchards
16.1.4A	The operator shall safeguard soil, water and air and ensure general conservation of the environment. Written policy, practice and procedures to support this shall be maintained.	Yes	Soil conservation plan in place that has written action plan on how to conserve the soil including use of mulching on trees, addition of humid material and incorporation of soil, Minimum tillage
16.1.5A	The operator shall put in place a system for monitoring and evaluation of use of water, pesticides and fertilizers and energy.	Yes	A system is in place for monitoring and evaluating pesticide use and fertilizer use and comparing the same with fertilizer plan and the CPP plan(crop protection products use plan). Data on how to reduce use in place with actions such as use of IPM strategies such as use of sticky traps in place
16.2	Pesticides use and disposal		,
16.2.1A	The operator shall have sufficient environmental protection procedures in place to demonstrate that there are no pesticide residues disposed into the environment.	Yes	Environmental procedures in place on environmental conservation detailing out how empty pesticide containers will be disposed appropriately and not to the environment .All pesticide mixes and washings are disposed as

16.3	Packaging resource minimization		disposal of spray wash and empty pesticide containers, and this was reviewed one in a soak pit constructed appropriately and away from the water sources
16.3.1A	The Operator shall provide a description of all materials used for product packaging and shipping in the Environment management plan.	Yes	Harvested avocados are packed in crates which are plastic, and a description of the plastic has been done in the Manual(Integrated Farm assurance manual rev 01). The crates are re-used after cleaning. Upon grading, sorting, and packing all final products are packed in boxes which are sourced from approved carton manufacturers who are certified to Forestry Sustainable Conservation. More to that the organization is also exploring into bulk packing of avocado into non-returnable crates
16.3.2A	The Operator shall provide auditable records of materials used in product packaging and shipping, including the type and quantities of materials used.	Yes	Quantities of packaging material are recorded. Reviewed records of between September and October season when harvesting was done
16.3.3C	The Operator shall assess the potential for: i. reducing the volume of packaging per unit of product delivered;	Yes	The organization is exploring into having plastic packaging material

	 ii. increasing the use of certified recycled or compostable materials; iii. obtaining materials from certified sustainable sources; or iv. Reusing packaging materials. Based on this assessment, the Operator shall develop a plan of action to minimize packaging and packaging-related waste, with auditable timelines and performance benchmarks. 		hence reducing consumption of cartons and obtaining this from sustainable sources.
16.4	Energy resource use and management		
16.4.1A	The Operator shall have written policy, practice and procedures in place describing action to improve and optimize energy uses and to ensure that hydrocarbon fuels and electricity are used efficiently. Renewable energy sources are recommended.	Yes	An Energy management plan in place that looks into how to conserve an minimize energy use ref MORL.EN.PP.026.The plan is supported by a policy that was signed b the Head of Agriculture and the farm manager and includes commitme the farm wants to use to ensure minimization of energy use and efficience in machinery operations
16.4.2.A	The Operator shall provide in the Environment management plan a summary of electricity and fuel consumption activities associated with its agricultural production processes.	Yes	The energy management plan includes action plan as well as the current energy use in diesel, power and how much the farm was anticipating to reduce (I planned in the year as a reduction plan)
16.4.3A	The Operator shall provide a description of any on-site electricity or fuel generation activities, and describe conservation measures and methods employed to optimized efficiency.	Yes	Yes a description of al energy uses and the conservation measure were in place including the methods to be employed to ensure th reduction is achieved
16.4.4A	The Operator shall provide auditable records of fuel and electricity used in agricultural production processes, storage operations and administrative support facilities, including electricity and fuels used in applications such as: water	Yes	Records of water bills,power bills and a fuel use were in place a

	pumping, greenhouse lighting and climate control, cold storage facilities, farm equipment operation and packing operations.		were analyzed on a month by month basis and an year on year basis
16.4.5A.	The Operator shall complete an analysis of his fuel and electricity usage, and develop a plan for increasing energy efficiency, with timelines and performance milestones.	Yes	Analysis of trends on energy use were in place and any increase was discussed by the set energy committee that was in place
16.4.6A	The Operator shall determine and document the energy demand by the enterprise for developing an energy efficiency plan with goals and implementation activities towards increased efficiency, reduced dependency on non-renewable sources and increased use of renewable energy. Records shall maintained on all aspects of energy management	Yes	Energy efficiency plan was developed by utilizing the actions from the energy audit done and includes; replacement of machinery with new machinery e.g tractors, Replacement of all bulbs with energy saving bulbs Putting in place notices to all employees to switch off power when not in use
16.5	Integrated Waste and pollution management, recycling and re-use		
16.5.1A	All possible waste products produced by the farm processes shall be identified and documented.	Yes	All waste generated from the farm were identified, collected and segretaged
16.5.2A.	There shall be written procedures to minimize wastage and for the safe, hygienic disposal of rejected produce and rubbish. Organic material from produce whose pre-harvest interval have not been observed shall not be fed to animals.	Yes	Written procedures on safe and hygienic disposal of waste.
16.5.3A	There shall be a documented plan to minimize waste, reduce pollution and recycle wastes. The plan shall be implemented and confirmed by visible actions and measures.	Yes	Documented integrated waste management plan that details on the reduction of waste in the farm
16.5.4A	Wastewater treatment and disposal systems such as constructed wetlands, bio beds etc. are advised and shall be environmentally friendly, subjected to EIA and regular analysis done as per NEMA regulations.	Yes	All waste water were disposed in a soak pit and taken through sand and

			carbon filters before release to percolate through the natural water aquifer(rock structure)
16.5.5A	Written procedures for minimizing and disposal of non-hazardous waste shall be developed and communicated to all concerned persons and relevant authorities.	Yes	Written procedures on safe disposal of all hazardous and non hazardous waste were evidenced posted at relevant disposal sites, on notice boards and relevant entry points within the farm
16.5.6A	The farm or premises shall be clear of litter and shall have adequate provisions for waste disposal.	Yes	Yes appropriate waste disposal sites in place
16.5.7A	Burning of wastes shall be done in a controlled manner. Burning for hazardous material shall be carried out in a NEMA approved and licensed incinerator. There shall be designated areas for burning or burial of non-hazardous waste which cannot be recycled or composted.	Yes	No burning of waste in the farm. All empty pesticide containers were collected in a caged facility and later collected by an approved expert(Environmental combustion consultants for safe disposal
16.5.8A	Only approved non-ozone depleting refrigerants shall be used. The operator shall carry out reafforestation activities with native species on the margin of natural water sources/or in protective forest reserve area defined by NEMA where appropriate.	Yes	No ozone depleting gas used. All cold room use R404
16.5.9A	Documented Identification of all waste generated as well as source of pollution at each stage of production process shall be provided.	Yes	Identification of all waste sources and all waste disposal sites was verified
16.5.10A	Documented management plan for reducing generation of wastes and pollutions sources and training in waste management for personnel for adequate handling of waste materials shall be available.	Yes	Documented management plan on waste reduction in place as discussed in below report
16.5.11A	Risk assessment for storage, transport and disposal of wastes shall be carried out periodically.	Yes	Documented waste management risk assessment covering all waste in place as

			discussed in below report
16.5.12A	Wastewater disposal systems such as soak-waste water treatment facilities or constructed wetlands shall be environmentally acceptable. Waste shall be handled in appropriate ways to avoid risk and unnecessary environmental impact.	Yes	All soak pits were environmentally friendly
16.5.13A	The operator shall put in place a system for treatment of domestic sewerage water, and Warehouse for storage of pesticide wastes and other hazardous wastes.	Yes	All pesticide were appropriately stored and kept off from domestic sewage water lines
16.5.14A	Old sump oil shall be not allowed to contaminate the environment. It shall be disposed of in a safe manner. It may be used as fuel but only in a suitable combustion system.	Yes	Oil was taken to Menengai Oil Refinery for safe utilization in recycling
16.5.16A	Waste material such as plastic sheet, cardboard, wood etc. shall be recycled.	Yes	All waste plastic were sold to approved recycling plants for recycling
16.5.17A	Only packaging material which can be reused or recycled in the importing country shall be used.	Yes	Packaging material used were cartons made of wooden boxes and were appropriate and approved in the country as well as destination country
16.5.18A	Every effort shall be made to reduce the use of natural materials that have not been grown specifically for commercial use (timber etc.).	Yes	The farm has a policy on no use of natural materials unless necessary e.g Timber
16.5.19A	The operator shall implement improved methods of waste management.	Yes	Efficient and improvised methods on waste management were evident
16.6	Water sources		
16.6.1A	There shall be no disposal of hazardous chemicals, empty containers or other waste material within 500 m of open water sources, 250 m of a borehole or on riparian land.	Yes	No disposal of waste near water source
16.6.2A	There shall be no waste water treatment facility, latrine, flush toilets or septic tanks within 500 m of an open water source, 250m of a borehole or on riparian land.	Yes	No wastewater facility including latrines near open water sources, borehole or riparian land

16.6.3A	Riparian land shall be conserved according to the relevant National Environmental Regulations.	Yes	No framing on all riparian land and or disposal of waste
16.6.4A	Rivers shall not be dammed or diverted without permission from the relevant competent authority for water resources. Lakes shall not be restricted by bunds or dykes.	Yes	No abstraction from River. All the dam and the bore hole were permitted by Water resource authority
16.7	Wastewater Treatment		
16.7	The Operator shall ensure that wastewater from production and domestic sources are treated separately. Rinsate from the cleaning of agricultural machinery shall be contained to prevent mixing with domestic wastewater.	Yes	No mixing of domestic water and waste water. All waste water was put in a soak pit and contained where it would pass though layers of sand and carbon filters before percorating to the natural aquifer
16.8	Bio-diversity and ecological conservation		
16.8.1A	There shall be a documented conservation policy or statement which shall comply with the local legislation governing wildlife and conservation issues.	Yes	Documented Flora and Fauna Conservation plan(Biodiversity plan 2021-2023 in place that looks into how the farm would conserve all natural ecosystems
16.8.2A	All non-cropped areas shall be managed so as to encourage wildlife. Tree planting areas shall be defined so that unnecessary disturbance is avoided and to enable environmental upgrading. Where land is cleared by burning, precautions shall be in place to avoid the spread of fire to other areas.	Yes	All areas that were not under farming were left bare to enhance growth of natural ecosystem including flora and Fauna. No application of Class 1 chemicals that would affect wild animals and natural Pest. No spraying on buffer areas and non cropped areas
16.8.3A	Operators bordering designated environmental sites shall acknowledge and respects the sites. Natural game corridors shall be maintained to allow wild animals access to water and to other land areas	Yes	Buffer areas and non cropped areas were all designated

			environmental sites and also provided natural corridors
16.8.4A	The operator shall implement a permanent programme aimed at improving landscape and bio-diversity within the farm and its perimeter.	Yes	Programme on how to rehabilitate the landscape was detailed in the biodiversity plan 2021-2023
16.8.5A	The Producer shall not engage in the following activities: a) Clearing of Areas of High Ecological Value for purposes of planting or other activities of the Agricultural Production Operation. b) Alteration of natural water bodies and water channels. c) Activities that negatively impact threatened or endangered habitats or species.	Yes	No clearing of areas of high ecological values e.g near river banks, natural spring water sources e.t.c
16.8.6A	The Producer shall train workers in the implementation of the Environmental management Plan's stated ecological procedures and practices, and keep records of such training.	Yes	Training of workers on maintenance of natural ecosystem done as part of environmental conservation with the latest training dated 13-02-2022 by Raphael M.
16.9	Soil conservation		
16.9.1A	A good agricultural practice (GAP) policy shall be maintained covering all aspects.	Yes	A well-documented and implemented Good agricultural policy in place that detail on all good agricultural practices including soil,water,natural ecosystem and biodiversity conservation plan
16.9.2A	Where applicable riparian land boundaries shall be established and riparian regulations observed.	Yes	No farming on all riparian lands
16.9.3A	The use of organic manure and composted waste shall be encouraged for maintenance of soil fertility.	Yes	Use of composted materials such as plant weeded in the farm was seen evident

17.1A	There shall be written procedures for the safe, hygienic disposal of rejected produce and rubbish. Organic waste materials from crops which have been treated with pesticides can be fed to animals if GAP has maintained and preharvest intervals complied with.	Yes	Yes documented environmental policy that detail on all waste generated and how some are re used and how some are sold for recycling such as metal bars
17.2A	Wastewater disposal systems such as soak pits or constructed wetlands are advised and shall be environmentally friendly and subject to EIA.	Yes	Yes the farm had been audited on environmental impact assessment
17.3A	All possible waste products produced by the farm processes shall be identified and documented, as are the potential sources of pollution.	Yes	All waste segregation area are identified including plastic, organic waste and recycling waste
17.4A	Written procedures for minimizing and disposal of non-hazardous waste shall be developed and communicated.	Yes	Written documented procedures on minimizing disposal of non hazardous waste in place
17.5A	There shall be a documented plan to minimize waste, reduce pollution and recycle wastes.	Yes	Documented plan on waste reduction in place
17.6A	The plan shall be implemented and confirmed by visible actions and measures.	Yes	Action plans implemented and were adequate
17.7A	The firm and its premises shall be clear of litter. The premises shall have adequate provisions for waste disposal.	Yes	The farm was free of litters and waste
18	COMPLAINT HANDLING PROCEDURES		
18.1.A	The operator shall show commitment to adequately address complaints that may arise with regard to the activities of the firm/farm.	Yes	The organization had documented a procedure on complaint handling ref MORL/CP/PP/017 and establish the process of handling complaints that includes determining the root cause and developing correction and corrective action. There had not been any complaints recorded in the year as there was no complaints raised

18.2A	There shall be an established and documented complaint handling procedure addressing all issues relating to the farm's / company's activities.	Yes	The organization had documented a procedure on complaint handling ref MORL/CP/PP/017 and establish the process of handling complaints that includes determining the root cause and developing correction and corrective action. There had not been any complaints recorded in the year as there was no complaints raised The complaint procedure focusses on both internal and external complaints and includes the activities that the company is in place.
18.3A	The procedure shall state all the steps taken to address arising complaints and all the recommended corrective actions shall be stated and acted upon.	Yes	The complaint procedure focusses on both internal and external complaints and takes into consideration all the activities onsite and how corrective actions are implemented which includes correction and corrective actions and the steps in place
18.4A	The complaint handling procedure shall be regularly reviewed to enhance effectiveness. The evaluation system shall be used to determine the reason for clients' complaints and the corrective and preventive action undertaken.	Yes	The complaint handling procedure in place details on how evaluation of effectiveness
18.5A	The procedure shall be available to customers as required.	Yes	The procedure will be available for any client that may request it as had been documented in the manual

19.0	Legal and Contractual Obligations		
19.1	Legal Compliance.		
19.1	 The operators shall comply with applicable national laws and regulations and with applicable international treaties and agreements. a) The operator does not have outstanding (unresolved) issues of non-compliance with all applicable national laws and regulations and with applicable international agreements. b) The operator knows and complies with the applicable laws and all applicable licenses, permits and other legal requirements are valid. c) Number of final, binding and non-controvertible decisions of the applicable judicial authority against the operator related to the violation of applicable national laws and regulations and with applicable international agreements. d) A mechanism for ensuring that all identified laws and regulations are implemented. e) An appropriately scaled system for tracking any changes in the law. 	Yes	The farm was registered by AFFA as a large-scale farm located in Rongai Subcounty of Nakuru County and the permit was valid to 3-06-2022, It was also noted that the farm had a valid water abstraction permit by Water resources Authority and the permit was valid to 2024. Abstraction of water was within the required limits set out in the permit.
19.2	Intellectual property (IP) rights and royalties		
19.2.1A	Operators shall respect the IP rights related to the germplasm used in breeding programs	Yes	No intellectual materials used onsite
19.2.2B	Breeders and propagators will continue to inform and train their employees in order to respect IP rights, applicable legislation and this code of conduct.	Yes	No breeder's material planted onsite
19.2.3B	Royalties will be set within internationally acceptable ranges as negotiated by the parties.	Yes	No breeders patented materials used onsite
19.2.4C	Arbitration		
	In case of any unresolved disagreements between parties in the fruits and vegetables value chain, arbitration will be through applicable laid down regulations and procedures.	Yes	No breeders patented materials used onsite
19.3A	Registration and certification of nurseries		
	Breeders, propagators and growers shall be registered by the competent authority following compliance inspection. Documentation that the nursery is regularly audited by the relevant regulatory agency should be provided.	Yes	No breeders, propagation unit onsite
19.4.	Ownership and transfer		
19.4.1	If the holder of the permit advertises a variety for sale the advertisement must specify the permit number allocated	Yes	No varieties per tented and sold

	to the permit by the regulatory agency.		
19.4.2 .	Plants offered for sale must be healthy and certified to be healthy by an authorized person in the company.	Yes	No IPP Materials handled onsite/No propagated materials
19.4.3	The person must be competent and qualified to carry out quality assurance and inspection. The materials shall be accompanied by a declaration of freedom from pests and diseases.	Yes	No IPP material handled onsite. No propagation unit onsite
19.4.4.	If the holder of the permit sells plants to a person (the receiver), the holder of the permit must give written notice to the receiver of: i. the number allocated to the permit by the relevant government agency, ii. the common characteristics of the variety, iii. the standard of care appropriate for the variety iv. Information on any known condition of the variety that might affect its future development should be disclosed to a prospective purchaser prior to sale.	Yes	No propagation unit onsite
19.4.5	Breeders, propagators and growers shall provide their guarantee policies to prospective buyers that shall include plant health assurance in compliance to the Plant Protection Act, Cap 324 of the laws of Kenya and to the International Plant Protection Convention (IPPC). This obligates parties trading in plant materials to ensure that transfer of technologies excludes transfer of pest and disease across trading parties and that operators prevents entry and spread of pest and disease in protecting the country for sustainable agricultural production and environmental safety. The buyer-seller contracts shall provide the compensation terms and conditions on pest and disease/ plant health problems traceable to the breeder materials.	Yes	No propagation unit onsite