KS1758 HORTICULTURE INDUSTRY — CODE OF PRACTICE

PART 2: FRUITS AND VEGETABLES

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| **FARM REFERENCE NO:** | **MENENGAI OIL REFINERIES LTD-AVOCADO UNIT** | **DATE/S:** | **26-28/06/2025** |
| **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

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|  **Client’s Name:**  | Menengai Oil Refinery Limited -Avocado Unit |
| **Certification Contact:**  | Thomas Simiyu.RSPO, ISO MR & Continual Improvement Lead |
| **Standard/ Scope:**  | KS 1758 Part 2\_2016  |
| **Type of Audit:** **KS 1758 Audit Application number:** | Certification audit OP-559D2062025 |
| **Date when audit request was created on AFFA-HCD Portal:**  | June 20, 2025, 4:52 p.m |
| **Date of Audit**  | 26-28/06/2025 |
| **Farm Location** | Rongai, Nakuru County |
| **Products** | Avocado fruits |
| **Category** | Single Unit Production and Packing  |
| **Any Parallel Production** | No |

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| **SIGNED** |  |
| **Rowland Gakuo** |  | **Auditor** |
| **Thomas Simiyu**  |  | **Management Representative** |

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| **Summary of Nonconformities** |
|  | **No of Non-compliances** |
| **Legal and Regulatory issues** | **00** |
| **Major Non-Compliances** | **00** |
| **Minor Non-Compliances** | **00** |

**Page one of this checklist provides the instruction to the auditors**

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| COMPLIANCE VERIFICATION AND COMMENTS 1. Verification for compliance is recorded in the audit checklist in the following ways.
2. Yes
3. No
4. N/A
5. Comments.
6. The checklist must be marked within the following guidelines:
7. A tick (√) on the “Yes” column of the checklist indicates 100% compliance.
8. A tick (√) on the “No” column of the checklist indicates partial compliance or 100% non-compliance.
9. N/A in the “No’ column indicates that the clause of the standard is not applicable to the operator.
10. 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.
11. 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.
12. Any Clause in the standard categorized as “A” indicates a *major must* requirement. 100% compliance of all applicable Major must control points is compulsory.
13. Any clause in the standard categorized as “B” indicates a *minor must* requirement. 95% compliance of all applicable Minor Must control points is compulsory
14. Any Clause in the standard categorized as “C” indicates a *recommendation* and is encouraged but not mandatory
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|  | **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 growing or exporting company. | **Yes** |  | The organization had documented in the integrated Farm assurance Quality Manual signed by the Site General Manager ref MOARL/AGRIC/MAN/001 dated revised 08-06-2024 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 Kenya association of Manufacturers (2025) and other industry organization. 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 1758All 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 08-06-2023 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 ref MORL-AGRIC-POL-007
8. Food Safety Declaration ref MORL-AGRIC-POL-008
9. Health and Safety Guidelines ref MORL-AGRIC-POL-009
10. Waste Management Policy and Procedure ref MORL-AGRIC-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 0rocedures

Written Job descriptions have been given to all personnel and reviewed samples such as production supervisor who holds the role of 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 |
| **4.3A** | The operator shall demonstrate a commitment to continual improvement of standards in social responsibility towards all categories of workers. | **Yes** |  | The organization has 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 with appointment dated 09-04-2024 |
| **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 October 2024 and was valid 2 year or whenever there are changes that would prompt changes |
| **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 04-01-2024 prepared by Farm Manager and Authorized by the G.MNon-Conforming handling and Corrective action procedure dated 03.01. 2024.The procedure was appropriate and implemented effectively |
| **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 Co-ordination Act, 1999.  | **Yes** |  | Documented Environment Policy signed dated January 2020 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 management. |
| **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** |  | All chemicals are procured from registered companied by PCPB and they all had PCPB Registration and were ensured that they are registered for avocado fruits. All propagation materials were reviewed sourced from accredited propagators as detailed in below report |
| **4.10.2A** |  Where used, Genetically Modified Organisms (GMOs) shall be in accordance with the Biosafety Act and the prevailing regulations. | **Yes** |  | Commitment in form of a policy done by the organization ref MORL-AGRIC-POL-011 GMO policy signed dated 03-October 2023Declaration that the propagation material are GMP Free were reviewed in place from the propagators  |
| **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** |  | Documented site traceability procedure Version 1 dated 04.01.2025 ref MORL-AGRIC-FORM 005 that dictates on how traceability system is in the farm.All blocks 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 farmSoil 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 cartographic 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 analysis1. Block 1 Report #CM171SA0357 dated 21 May 2025 by Crop Nuts Laboratory
2. Block 2 Report #CM171SA0358 dated 21st May 2025 by Crop Nuts Laboratory
3. Block 3 Report #CM171SA0359

dated 21st May 2025 by Crop Nuts Laboratory1. Block 4 Report #CM171SA0360 dated 21st May 2025 by Crop Nuts Laboratory
2. Block 5 Report #CM171SA0361 dated 21st May 2025 by Crop Nuts Laboratory
3. Block 6 Report #CM171SA0362 dated 21st May 2025 by Crop Nuts Laboratory
4. Block 7 Report #CM171SA0363dated 21st May 2025 by Crop Nuts Laboratory
5. Block 8 Report #CM171SA0364 dated 21st May 2025 by Crop Nuts Laboratory
6. Block 9 Report #CM171SA0365 dated 21st May 2025 by Crop Nuts Laboratory
7. Block 10 Report #CM171SA0366 dated 21st May 2025 by Crop Nuts Laboratory
8. Block 11 Report #CM171SA0367dated 21st May 2025 by Crop Nuts Laboratory
9. Block 12 Report #CM171SA0368 dated 21st May 2025 by Crop Nuts Laboratory
10. Block 13 Report #CM171SA069 dated 21st Sept 2025 by Crop Nuts Laboratory
11. Block 14 Report #CCM171SA0370 dated 21st May 2025 by Crop Nuts Laboratory
12. Block 15 Report #CCM171SA0371dated 21st May 2025 by Crop Nuts Laboratory
13. Block 16 Report #CCM171SA0372 dated 21st May 2025 by Crop Nuts Laboratory
14. Block 18 Report #CCM171SA0373 dated 21st May 2025 by Crop Nuts Laboratory
15. Block 18 Report #CCM171SA0357dated 21st May 2025 by Crop Nuts Laboratory

Corrective action Plan done by the AgronomistSoil Correction summary reports for September ref MORL/AGRIC/FORM/033 reviewed e.g 01 st October soil correction by Farm assistant Manager done with spray of copper suplhate recommended on block 1 which was identified to be deficient of phosphorous, Calcium, Sulphur, manganese and BoronProduce 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 detailsIntake 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, Association Logo and Produced and Packed by Mennenga Oil The box indicates the produce as produce for export only. No internal packs for each avocado |
| **5.1.5.A** | Produce sourcing: Traders shall procure produce as per the Horticulture regulations and ensure the following;1. All growers, traders and processors shall be responsible for the safety of the produce and products.
2. All farm produce shall be labeled at source based on guidelines provided in this code
3. All Food products shall be labeled in accordance with East African standards, EAS38: 2000 advertising and presentation must not mislead consumers.
4. 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.
5. 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.
6. Unsafe food produce and products must be withdrawn from sale or distribution chain or recalled from consumers if already sold.
7. The requirement for withdrawal or recall applies to all stages of production, processing and distribution of food produce and products.
8. 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.
9. 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.
10. 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.
11. 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 packhouse is inspected and recorded in intake and process inspection form ref MORL/AGRIC/FORM/057 with several sampled batches of intake dated 12-05-2025 ,22-05-2025,27-05-2025 sampled and recorded the source(Block number) the Vehicle number that delivered the produce, food safety checks of the material including any disease or deformation noted, any chemical deposit, any foreign body, any live Pest, arrival condition and arrival temperatures from the field, |
| **5.3** | **Produce receipt** |  |  |  |
|  | 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 to enable the produce to be clearly traced from receipt through the handling process to dispatch point. | **Yes** |  | Al material handling from the farm has 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:1. 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;

 1. agrochemical stock record;
2. 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;
3. a list of all the chemicals used in the farm;
4. a list of “Hazardous” and “Highly Hazardous” (WHO Class 1a and 1b) chemicals in use on the farm including source, application and disposal records
5. 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
6. 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);
7. maintenance of the spray supervisor log book to include record of filter cartridge replacement in respiratory protection equipment
8. all machinery including spraying machines shall have a log book, showing maintenance regular calibration checks, dates of service etc.
9. a record of daily amount of water consumption, all fertilizer usage, date, type, crop weather conditions (Form 9);
10. 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.
11. 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;
12. a list of first aiders and training given;
13. a record of disposal of dilute pesticides, pesticide containers etc and a simple map of the entire disposal sites whether in use or not;
14. a record of work contracts for permanent and seasonal workers;
15. a record of all the daily roll call for all casual workers;
16. a record of all the monetary receipts in accordance with the pay roll and any receipts of payment of kind.
 | **Yes** |  | Inventory of the agrochemicals in place retained on the system with stock inventory reviewed for the dates 01-05-2025 to 26-06-2025 and indicates the stock levels of chemicals and fertilizersAll supplies related to Chemicals and fertilizers are accompanied by Safety data sheets and delivery notes that indicate the description of the fertilizer or chemical, quantity.eg reviewed the following delivery notes18-04-2025 Delivery 207 Humikal(5kg),Borcazink(20 Ltrs),Jovit Jet(20kgs),Agroleaf High P(15kgs),Agro leaf magnesium(15kgs) and Mult N(20 Ltrs) delivery note number 277 from Mambo Wholesalers27-05-2025 Delivery of Gypsum dated 27-05-20-25.13-06-2025 Delivery of Arteta 330EC and Skyway 5ltrs supplied under Delivery note 318106 dated 13-06-2025.Delivery note delivery of Ferrari Gold dated 10-03-2025 (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 18th April 2025 with 27 trained by Farm spray supervisor
2. Training on safe and effective use of agrochemicals done by Kenagro with certificates reviewed dated 19-11-2024
 |
| **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. The farm manager or Farm crop foreman and 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 noncompliance found as all documents and details were filled in appropriately. |
| **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 30th Sept 2024 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 reviewed1. 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 5Imports 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 2021KEPHIS 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** |  |  |  |
| **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** |  |  |  |
| **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* Plant Import Permit by KEPHIS dated 02-03-2021 ref 411645
* 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)
* 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 (Phyto -sanitary certificate) ref 654225 dated 24th 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 Convention (IPPC). | **Yes** |  | All material complies to local Phytosanitary 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)** |  |  |  |
| **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 Lead Expert 035Soil Maps done for all the 18 blocks detailing on the farm blocks, acreage and total plant population, 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 systemSite 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 /Ver 01Environmental NEMA approval dated 11th Feb 2025 ref NEMA/NKR/SPR/5/2/0246 |
| **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. Checked records of intake between 17-05-2025 to 26-06-2025 |
| **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 sandy-clay 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 soilsPlanning of fertilizer is based on the soil analysis done and detailed above in the report with nonreactive actions done to address deficiencies and also address any excess nutrients beyond required limits. The latest soil analysis had been done in 21st May 2025 by Crop Nutrition Laboratory services . |
| **9.2** | **Cultivation** |  |  |  |
| **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** |  |  |  |
| **9.5.1C** | Operators who use substrates are advised to recycle them and there shall be documentation to show the suitability of such substrates. | **Yes** |  | N/A |
| **9.5.2B** | Where substrates are used and recycled, there must be documentation on quantities used, and dates of recycling. If substrates are used but not recycled, justification shall be given.  | **Yes** |  | N/A |
| **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 basedonsoil, 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 humus to improve on the infiltration in the to the soil particlesReviewed Fertilizer plan for March 2025 dated 05-05-2025 and previous dated September 2024 with dates 09.09.2024 approved by Fram manager |
| **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 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  |
| **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** |  | The advisor on fertilizer application is trained with a PHD in Plant genetics and Crop Protection from Hebrew University of Jerusalem |
| **10.1.5A** | Trained and competent employees shall be responsible for fertilization programme. | **YES** |  | Employees are trained with training done by Supervisors dated 08-06-2024 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 11th June 2018  |
| **10.1.7A** | Inorganic fertilizers used on the farm shall have a fertilizer profile detailing chemical content. | **Yes** |  | A fertilizer profile detailing on the chemical content of each fertilizer applied 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 09-09-2024 Humigreen (Humical Fe) applied on block 1 to Block 18. 03-04-2025 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 with 1350kgs applied  |
| **10.2.2A** | A recording system shall be established for each application of fertilizers: date, type (trade name), quantity, method, type of machinery used for the application, method of application and the name of the operator of each application must be recorded. | **Yes** |  | Recording in place see above |
| **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 21-10-2024 and the next planned in October 2025 ref 0215 done by Technician 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 12-05-2025 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 startup reviewed between the dates 06-04-2025 to 25-06-2025 on intermittent dates when application was to happen e.g 06-05-2025 |
| **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 May 2025 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 09-04-2025,05-05-2025,19-04-2025,22-04-2025 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 |
| **10.6.2A** | 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 |
| **10.6.4A** | 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 |
| **10.6.5A** | 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 and stored in an appropriate manner to contain the risk of contamination of the environment. This shall be in a designated area away from water sources.  | **Yes** |  | N/A. No organic fertilizer applied |
| **10.7.2**C | Where organic fertilizer is useda documented risk assessment shall be carried out before use and shall consider the source and characteristics of the fertilizer risks of disease transmission, weed seed, and method of composting.  | **Yes** |  | N/A/No organic fertilizer 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 03-10-2024,04-04-2025 with 12m3 and 7 m3 of water used as a sample. 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 permits by Water Resources Authority ref WRMA/20-/00277/2EC/10736/G for a borehole approving abstraction of 20M3/Day and allowed for 5 years from the year 2025 |
| **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 evapo-transpiration 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 03-10-2024,07-01-2025,09-02-2025,03-04-2025,04-04-2025with 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 is 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, 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 11-03-2025 and soil water needs dated 21-05-2025 |
| **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 was 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 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 onsite and approved with a permit by water resources Authority valid to 2030 and was within the legal limits. The abstracted water was stored in a dam before use in the field operations |
| **11.2.5C** | Operators will endeavor to harvest rainwater and recycle water used within their farms to reduce reliance on natural sources. | **Yes** |  | 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 18-03-2025 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 3rd party analysis reviewed done by Crop Nutrition Laboratories dated 15th May 2025 and the report detail on the parameter tested, units, results and the range. The report reference CM171WA0029 reviewed dated 15th May 2025.Another test relating to dam water was reviewed dated 28/05/2025Internal 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 abnormalities 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 results dated 28/05/2025 |
| **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 June 2025 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 farm manager dated 03-07-2024 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 04-03-2025 where switch ;copper suplhate was recommended and done dated 08th March 2025 |
| **12.1.4** |  The following principles shall be observed for propagation materials: |  |  |  |
| **12.1.4.1** | **Sanitation** |  |  |  |
| 1. An approved written procedure detailing Sanitation must be available.
2. 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.
3. To have access to and use an accredited laboratory (internal or external) where plants are checked for diseases, and where soil and water is analysed
4. This should be in accordance to the relevant standard for irrigation water, drinking water and for other operations
5. A double door system should be introduced where applicable in all propagation facilities to minimize entry of pests and diseases.
6. Cutting tools should be disinfected regularly. The disinfectants should be changed regularly.
7. Ensure that lose dust in propagation facility is minimized
8. Water used in propagation facilities shall be free from physical, microbial and chemical contaminants.eg treatment with either chlorine, calcium hypochlorite, copper sulphate, aluminium sulphate, UV light or by ultra-filtration before use.
9. Personal protective equipment for every propagation facility should be provided to prevent cross-contamination
10. Movement from one propagation facility to another should be avoided.
11. pH of Irrigation water should be monitored regularly and adjusted accordingly as it affects availability of nutrients and multiplication of certain plant disease causing organisms.
12. Tools and equipment in contact with propagation materials such as trays/crates/bags should be disinfected.
 | **Yes** |  | N/A.No propagation material area. All materials are propagated in approved nurseries and procured from those approved KEPHIS nurseries and imported with accompanied Phytosanitary documents in place. See details on crop |
| **12.1.4.2**. | **Control of diseases and pests** |  |  |  |
| 1. Diagnostic tools for various diseases and pests of economic importance should be available to screen plant materials and prevent pest and disease spread.
2. 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 cycles of propagation materials.
3. Ways of obtaining clean planting materials such as tissue culture should be explored
4. Rigorous and periodic scouting should be carried out and where infection is detected early, infected plants should be removed followed by destruction of rouged plants and treatment of infected areas with disinfectants.
5. All persons entering propagation facilities should wear clean and appropriate protective clothing as per PPE policy to minimize introduction and spread of pests
 | **Yes** |  | No propagation of material done onsite |
| **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 11-08-2024.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) and chemical (plant protection products) methods. They shall be based on a thorough evaluation of the situation, taking into account integrated pest management systems. | **Yes** |  | Scouting is done and incase of pest infestation beyond the required 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: 1. past history of infestation;
2. indication of main threats;
3. understanding and implementation, where possible, on non-chemical options; including rotations, crop hygiene, resistant varieties, cultural and biological control;
4. 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 non-chemical 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 19-05-2025 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, date, active ingredients, doses, method of application and operators name and written justification for their use. | **Yes** |  | NA No soil fumigant 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 used in accordance with the prescription for purpose fit for use. Operators shall keep up to date with the most current list of acceptable pest control products locally and internationally as applicable.  | **Yes** |  | NA No soil fumigant used in the farm or 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 13-04-2025 to 28-05-2025 2(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: 1. 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.
2. from licensed distributors;
3. Labeled by the manufacture as per the Pest Control Products Act, Cap 346
4. Accompanied with material data sheet.
5. Purchase receipts of all pest control products shall be maintained for at least 12 months.
 | **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 06-09-2024 on Botrytis . MASTERCOP 60 SC(PCPB(CR)1424) Copper Sulphate Pentahydrate 236 g/L equivalent to 60 g/L copperTECTO 500 SC(PCPB(CR)0914) with A.I Thiabendazole 500g/LBIOSURE 120 SL(PCPB(CR)1423)Benzoic acid 120 g/LAll 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 2025 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 co-relate |
| **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 2025.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 June 2025 and next was planned In Dec 2025 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. | **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 |
| **12.3.6.13A** | The store shall be bunded to contain any spillages and contaminated water used for cleaning or firefighting.  | **Yes** |  | Spillage kit in place and 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 06-09-2024 on Botrytis . MASTERCOP 60 SC(PCPB(CR)1424)Copper Sulphate Pentahydrate 236 g/L equivalent to 60 g/L copperTECTO 500 SC(PCPB(CR)0914) with A.I Thiabendazole 500g/LBIOSURE 120 SL(PCPB(CR)1423)Benzoic acid 120 g/LAll 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 2025 |
| **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 onsite. All 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 application of the chemical was reviewed detailed. e.g 06-09-2024 (Master Cop) justification on application related to Botrytis |
| **12.3.7.6A** | over reliance on pesticides with similar mode of action shall be avoided where repetitive applications are required to eliminate pest resistance | **Yes** |  | No use of repetitive chemical applications |
| **12.3.7A** | 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** |  | 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 2024 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: 1. workbench;
2. Running water supply shall be within at least 5 meters from the dispensing areas;
3. wash basin plus eyebath;
4. accurate measuring equipment;
5. suitable containers for pre-mixing of pesticides/chemicals;
6. Clear marking on all equipment to indicate they are for use with pesticides/chemicals only.
 | **Yes** |  | A chemical dispensing area and weighing area has been provided in the stores with a workbench, weighing scale and measuring jars, 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 |
| **12.3.8.2A** | Adequate and appropriate personal protective clothing and equipment shall be worn by those persons doing the dispensing. | **Yes** |  | 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 13-03-2025 and 19-05-2025 |
| **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 reentry 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 the rinsing water can be channeled to chemical wastewater treatment facility. Protective overalls if continuously used shall be laundered after use and stored in a hygienic well-ventilated location on the farm.  | **Yes** |  | All water from washings both the spray suit and 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 checkup at least twice per year but preferably every three months. Such check-up shall include sampling of blood 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.  | **Yes** |  | No application of organon phosphate carbamate |
| **12. 3.10.9A** | All equipment used for spraying shall be regularly inspected, well maintained, calibrated, and serviced. Any defective equipment shall be repaired and/or replaced immediately and be verified by a competent person. | **Yes** |  | All knapsacks used in application of plant protection products in the orchard that had been well maintained and were used in chemical application with 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. No defective equipment noted |
| **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 sources, dams, lakes, rivers. | **Yes** |  | No application of chemicals done near any 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 stop 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 the farm manager to all operators with sampled training done 06-08-2024 |
| **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 etc. The records must also give the name of the pest, disease(s) or weed(s) treated.  | **Yes** |  | No seed treatment |
| **12.3.11.4A** | The re-entry interval shall be stated for all the crop protection products applied and the re-entry time indicated and recorded. | **Yes** |  | Reentry period details on 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 |
| **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** |  | Training on safe operation of equipment’s done dated on 17th April 2025 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.  | **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 2024 |
| **12.3.11.11A** | There should be a record of obsolete or expired pesticides and empty containers.  | **Yes** |  | 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: 1. agrochemical stock record.
2. 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.
3. a list of all the chemicals used in the farm;
4. 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**  |  |  |  |
| 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 | **Yes** |  | All measuring jars were appropriate and had measuring reading well labelled |
| **12.3.13** | **Disposal of Surplus Pesticides** |  |  |  |
| **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 21-06-2025 |
| **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 dated 21-06-2025 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 31-12-2025 |
| **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 and fauna.  | **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 |
| **12.3.14.4A** | 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 07-01-2025 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 14-04-2025 report by SGS Laboratory report ref Report MA25-01789.001 |
| **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 Report MA25-01789.001 DATED 14-04-2025 and report ref MA25-01790.001 dated 14-04-2025 by SGS Laboratories dated 14-04-2025 |
| **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 07-01-2025 |
| **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 07-01-2025 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 readily cleaned and well maintained | **Yes** |  | N/A.all avocado 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 dated revised 07-01-2025 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 07-01-2025 |
| **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 Latest portable water analysis report dated 25-05-2025 by Analabs and included all parameters as per portability requirements detailed in KS EAS 12:2018 |
| **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 21-12-2025 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 from rodent, insect and other pest ingress. The facility shall be designed to protect the produce and the packaging material from any adverse weather. | **Yes** |  | N/A No Field holding facility |
| **13.2.3A** | 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 far 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 to week 16 of 2025 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 birds and other flying insect. The packhouse had two flying insect catchers which were serviced service provider together with the rodent stations with the latest inspection dated 05-06-2025 |
| **13.5.9A** | The height of grading tables and other facilities for work shall be appropriate for the comfort of the workers.  | **Yes** |  | 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 30-04-2025 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, microbiological contamination, and chemical contamination |
| **13.8.1** |  **Produce receipt** |  |  |  |
| **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.SPEC0.20 and records the quality of each lot of products received in intake record book ref MORL.INT.RE.03 with sampled records between 02-10-2024 to 28-06-2025 |
| **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:1. reception at the pack house
2. quality-control during processing;
3. final quality check when ready for dispatch;
4. Loading area.
 | **Yes** |  | Inspection of the farm produce was reviewed 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** | Final product check shall involve the following:1. identity of product,, lot/batch number, grower and/or pack house identity, date and packing code;
2. essential information such as class, variety and post-harvest treatment;
3. 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 29th Sept 2025 |
| **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 30th Sept 2024 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 13-07-2024 and 28-06-2025 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 13-07-2024 to 26-06-2025 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  |  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 to 22-12-2025 |
| **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 their health status. Workers are encouraged to report any illness before start of work |
| **13.13.1.3** | Medical examination of a produce handler should be carried out if clinically or epidemiologically indicated. | **Yes** |  | All personnel had valid medical certificates done by Rongai subcounty public health officer dated to 22-12-2025 |
| **13.13.4** | **Personal behavior** |  |  |  |
| 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 12-06-2025 to 26-06-2025 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 2025 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 of 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 and valid to 29-09-2025 |
| **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 pests. The facility shall be designed to protect the packaging material from any adverse weather.  | **Yes** |  | Stock controls were done and FIFO system followed for the product and 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 water unsuitable for drinking shall be appropriately marked.  | **Yes** |  | Drinking water was provided which was 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 with test dated 28-05-2025 |
| **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 2025 to Date |
| **14.1.5A** | Workerschanging 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 from 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 working 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 07-01-2025 and included how to make the 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 as per schedule plan MORLA.PP.SCH.01 which had been done for the year 2025 |
| **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 on safe operation of machines and records reviewed e.g., 12-04-2025 Reviewed training o safe operation of the forklift,09-05-2025 Safe Loading and unloading of fruits from the vehicle |
| **14.2.3A** | Readily available fire extinguishers and other appropriate firefighting equipment shall be easily accessible and regularly maintained. Fire alarms shall be fitted to each floor above the exit and there shall be evidence of evacuation drills.  | **Yes** |  | Fire extinguishers were reviewed appropriate and were services by an expert as detailed in the report above. They were placed in appropriate height |
| **14.2.4A** | There shall be clearly marked emergency exits, which shall be fitted with fire safety break locks or remain unlocked during working hours.  | **Yes** |  | Emergency exits were provided in the packhouse and well labelled using luminating material as emergency exits/fire exits |
| **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. | **Yes** |  | Safety rules and precautionary safety measures were in place. An emergency plan was in place with relevant contacts in case of emergencyThis included example: personnel safety 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 31-12-2025 by Nakuru County Government (Rongai Subcounty public health office)Workers had valid medical certificates valid to 21-12-2025 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 2025 and was collected with the latest collection dated 22-10-2025.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 2025 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 possible dangers and the precautions to be observed.  | **Yes** |  | Instruction’s training was done for all machine operators., Cold room training for operators dated 09-01-2025 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** | 1. Signs shall be displayed with regard to the following requirements.All sores and cuts shall be adequately covered with waterproof dressing:
2. hand washing for sanitary facilities with soap, hot air or paper (not cotton) towels shall be available;
3. no powder shall be used on hands as this may contaminate produce;
4. finger nails shall be clipped short;
5. protective clothing including overalls, head covering which shall contain all hair shall be worn at all times in packing areas;
6. 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
7. smoking, eating and drinking shall be prohibited in all food handling areas;
8. personnel shall be advised to keep personal belongings away from production lines and that: there should be;
9. no false nails, eye lashes or hair pieces;
10. no nail varnish;
11. no watches or jewelry except single plain band wedding ring;
12. no chewing gum; and
13. 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 trainingBasic hygiene training dated 24-04-2025 covering all staffBasic 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 compiled 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 SHA, Social Security fund 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 2025 to June 2025 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 SHA, Social security fund, 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 communicated to employees.  | **Yes** |  | All personnel had a contract spelling out of the role, specific tasks, the conditions including 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 seasonal 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 when public transport is not available and the employee does not live within easy or safe walking distance of the workplace.  | **yes** |  | Employees live within the neighborhood of the farm |
| **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 months on prorate basis |
| **15.4B** | All seasonal workers/sub-contractors must be entitled to leave on a pro-rata basis. | **Yes** |  | 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 incapacity signed by a recognized medical practitioner as per the employment act CAP 226. | **Yes** |  | All persons were entitling 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 termination of a particular job. | **Yes** |  | No discrimination for expectant or nursing mothers |
| **15.6.2A** | Expectant mothers shall be given due consideration and be assigned duties appropriate to their physical condition. 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.  | **Yes** |  | All expectant or nursing 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 2026 |
| **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 organization |
| **15.9** | **Freedom of association and participation** |  |  |  |
| **15.9.1 B** | 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 free to associate, and the organization had documented an appropriate policy on freedom of association which is a commitment allowing workers to freely associate and form representation as they wish. The workers were not under any CBA however they had formed their own internal farm welfare committee which engaged management on various issues |
| **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 representative in the welfare committee were democratically elected and were not subjected to any form of discrimination due to their representation |
| **15.9.3C** | The operator shall provide assistance to facilitate workers committees /union. | **Yes** |  | The welfare committee were provided with time within working hours to execute their role, were provided with trainings on how to undertake fair representation dated 02-08-2024 |
| **15.9.4C** | Workers committee/union shall participate in collective bargaining. | **Yes** |  | No CBA however the organization does not hinder any worker from joining a trade union |
| **15.9.5C** | Where a collective bargaining is negotiated it shall be in accordance with the labour institutions act 2007 and labour relations act 2007.  | **Yes** |  | No CBA however the organization does not 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 handled 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** |  |  |  |
| **15.16.1** | Records and documentation to be kept in addition to those required by the laws shall include:1. a record of work contracts for permanent and seasonal workers;
2. a record of all the daily rolls for all casual workers;
3. A record of all the monetary receipts in accordance with the pay roll and any receipts of payment of any kind.
 | **Yes** |  | All records are kept for a 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.01Records 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 01-08-2024 to 09-05-2025 when application stopped
* Scouting records reviewed May and June 2025
* Records of weeding activities
* Harvest records
* Grading records reviewed June 2025
 |
| **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 2025-2027 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** | Theoperator 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 per the procedure on 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** | **Packaging resource minimization** |  |  |  |
| **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: 1. reducing the volume of packaging per unit of product delivered;
2. increasing the use of certified recycled or compostable materials;
3. obtaining materials from certified sustainable sources; or
4. 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.
 | **Yes** |  | The organization is exploring into having plastic packaging material 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 and minimize energy use ref MORL.EN.PP.026.The plan is supported by a policy that was signed by the Head of Agriculture and the farm manager and includes commitment the farm wants to use to ensure minimization of energy use and efficiency 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 plans as well as the current energy use in diesel, power and how much the farm was anticipating to reduce (5% 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 all energy uses and the conservation measures were in place including the methods to be employed to ensure the 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 pumping, greenhouse lighting and climate control, cold storage facilities, farm equipment operation and packing operations. | **Yes** |  | Records of water bills, power bills and all fuel use were in place and were analyzed on a month-by-month basis and a 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 bulbsPutting 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 nonhazardous 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 percolating 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 2025-2027 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 2025-2027 |
| **16.8.5A** | The Producer shall not engage in the following activities:1. Clearing of Areas of High Ecological Value for purposes of planting or other activities of the Agricultural Production Operation.
2. Alteration of natural water bodies and water channels.
3. 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 13-02-2025 by Farm manager. |
| **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** | **Waste and pollution management, recycling and re-use** |  |  |  |
| **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 is 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 nonhazardous 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 were 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 raisedThe 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.1. The operator does not have outstanding (unresolved) issues of non-compliance with all applicable national laws and regulations and with applicable international agreements.
2. The operator knows and complies with the applicable laws and all applicable licenses, permits and other legal requirements are valid.
3. 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.
4. A mechanism for ensuring that all identified laws and regulations are implemented.
5. An appropriately scaled system for tracking any changes in the law.
 | **Yes** |  | The farm was registered by AFA as a large-scale farm located in Rongai Subcounty of Nakuru County and the permit was valid to 30-06-2026, It was also noted that the farm had a valid water abstraction permit by Water resources Authority and the permit was valid to 2030.Abstraction of water was within the required limits set out in the permit. Single business permit reviewed dated valid to 31st Dec 2025 |
| **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 to the permit by the regulatory agency.  | **Yes** |  | No varieties per tented and sold |
| **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 :1. the number allocated to the permit by the relevant government agency,
2. the common characteristics of the variety,
3. the standard of care appropriate for the variety
4. 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 |