**HORTICULTURE INDUSTRY CODE OF PRACTICE;**

**PART I FLORICULTURE (Flowers and Ornamentals)**

**AUDIT CHECKLIST**

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| **FARM REFERENCE NO** | **SUBATI GROUP LIMITED - SUBUKIA FARM** | | **DATE/S:** | | **22-23 May 2025** |
| **AUDITORS** | **1** | **TONY MULWA** | **2** |  | |
| **3** |  | **4** |  | |

**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. A tick (√) on the “N/A” column indicates that the clause of the standard is not applicable to the operator. 10. Comment(s) is/are 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 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 which shall be complied with. 13. Any clause in the standard categorized as ―**B** indicates a minor must requirement which must also be complied with. 14. Any clause in the standard categorized as ―**C** indicates a recommendation and is encouraged but not mandatory.   **COLOUR CODES FOR CONTROL POINTS:**  • **Section 1 –** All legal & regulatory requirements  • **Section 2a)** – All other Major Musts  • **Section 2b)** – All other minor must  • **Section 3** – All recommendations   1. **Scope:**   This Kenya standard Code of practice for the Floriculture industry specifies the requirements for legal compliance, the responsible and safe production of cut flowers and ornamentals. The code also applies to the procurement of inputs and placing in the market of flowers and ornamentals. It applies to all players in the industry including but not limited to growers, propagators, breeders, consolidators, shippers and cargo handlers.  **Some of the clauses of this standard are not applicable to some of industry players as listed below:**   |  |  | | --- | --- | | 1. **Growers: -**   Clauses 5.1.11 – 5.1.12, and 7.1.4 – 7.1.11, 8.21 | 1. **Consolidators:-**   Clauses 5.0 – 5.14.10, 6.0 – 6.7.6, 7.0 – 7.3.17.4, 8.8.1 – 8.8.8, 11.8.0 – 11.9.3 | | 1. **Breeders:-**   Clause 8.20 | 1. **Shippers: -**   Clauses 5.0 – 5.14.10, 6.0 – 6.7.6, 7.0 – 7.1 – 7.3.17.4, 8.8.1 – 8.8.8, 11.9.3 | | 1. **Propagators:-**   Clause 8.20 | 1. **Cargo handlers:-**   Clauses 5.0 – 5.14.10, 6.0 – 6.7.6, 7.0 – 7.1 – 7.3.17.4, 8.8.1 – 8.8.8, 11.9.3 | |

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| **CLAUSE** | **REQUIREMENTS** | **YES** | **NO** | **N/A** | **COMMENTS** |
| **4.0** | **MANAGEMENT SYSTEM** |  |  |  |  |
| **4.1** | **Management responsibility:** |  |  |  |  |
|  |  |  |  |  |  |
| 4.1.1A | The management demonstrates commitment to implementation and maintenance of operator socio-environmental performance. | **Y** |  |  | Policy in place dated March 2025 |
| 4.1.2A | Responsibility for and level of decision making has been defined within the organizational structure and have been allocated to suitably qualified and experienced people. | **Y** |  |  | Responsibilities were noted in the maintained tasks roles & responsibility of social-Environmental committee |
| 4.1.3A | The operator has a socio-environmental committee which defines in writing the frequency of meetings and keep meeting records, including commitments, deadlines and staff members responsible for the implementation and maintenance of the operator’s social and environmental performance. | **Y** |  |  | Meetings done on a quarterly basis ,last meeting done on 14.05.2025 |
| 4.1.4A | The operator has an approved socio-environmental policy in place and evidence of implementation. | **Y** |  |  | March 2025 |
| 4.1.5A | The operator has well defined socio-environmental objectives and goals which are:   1. Documented and showing their approval date. 2. Defined according to the operator’s socio-environmental performance level. 3. Consistent with the operator’s socio-environmental policy. 4. Measurable. | **Y** |  |  | SGLSF/04 of 01.03.2025 |
| 4.1.6A | The operator has developed and implemented a Socio-Environmental Action Plan. | **Y** |  |  | Socio-Environmental Action Plan was available for review. |
| 4.1.7A | The operator’s socio-environmental objectives, goals and programs are reviewed at least annually and review evidence is kept. | **Y** |  |  | 01.03.2025 |
| 4.1.8A | * The operator has committed to investigating non-compliance and to taking corrective actions where necessary. * Resources are allocated to this purpose as necessary. * Measures are taken to ensure that workers, out-growers and other stakeholders who raise concerns about non-compliances are not discriminated. | **Y** |  |  | The farm had a well implemented corrective action procedure. |
| 4.1.9A | The operator provides access to third parties carrying out external verification of compliance to the code of practice. | **Y** |  |  | A visitors book was kept for all 3RD parties accessing the COP. |
| 4.1.10A | The operator ensures contractors and subcontractors comply with all relevant clauses of the standard. | **Y** |  |  | All contractors and subcontractors were inducted first before access was granted. |
| **4.2** | **Internal audits:** |  |  |  |  |
| **4.2.1A** | There are Internal audits conducted at least once a year using this code and documents kept. | **Y** |  |  | Internal audit program available, evidence of implementation on 18.03.2025 was verified and found acceptable. 4 Nc raised. |
| 4.2.2A | There is a documented and implemented procedure for internal auditing. | **Y** |  |  | Internal audits procedure in place |
| 4.2.3A | There is a documented procedure for identification and handling of non-conformities. | **Y** |  |  | Procedure for identification and handling of Nonconformities GGLSF/07 version 4 |
| 4.2.4A | The operator has:  a) Annual program of inspections, internal audits or self-assessment.  b) Internal audit or self-assessment reports.  c. Follow-up on internal audit or self-assessment outcomes by a representative of management | **Y** |  |  | Internal audit schedule available dated 01.03.2024. |
| 4.2.5A | The operator has addressed internal and external non-compliances and relevant records are kept. | **Y** |  |  | Noncompliance Records were available for raised NCs from internal audit. All had been closed |
| **4.3** | **Training:** |  |  |  |  |
| 4.3.1A | The operator has a commitment to train the employee/out grower/subcontractor to ensure all are able to work in accordance with this code of practice. | **Y** |  |  | Operator’s commitment to train staff on the code of practice – KS1758 COP well demonstrated |
| 4.3.2B | The operator has a documented action plan on training. | **Y** |  |  | 2025 Training action plan is place |
| 4.3.3B | Training needs assessment has been done and documented. | **Y** |  |  | Training action plan implemented |
| 4.3.4A | Employees/ out growers /subcontractors are trained as per the identified training needs | **Y** |  |  | Staff received training on various topics. This was documented. |
| **4.4** | **Complaint handling procedure:** |  |  |  |  |
| 4.4.1A | The management commitment to adequately address complaints that arise with regard to the the operations is demonstrated. | **Y** |  |  | Procedure for handling customer complaints and grievance/complaints handling procedure available**.** |
| 4.4.2A | Established and documented complaint handling procedure addressing all issues relating to the operator’s activities is available. | **Y** |  |  | Procedure for handling customer complaints and grievance/complaints handling procedure available |
| 4.4.3A | The procedure states all the steps taken to address arising complaints and all the recommended corrective actions stated and acted upon. | **Y** |  |  | Procedure for handling customer complaints and grievance/complaints handling procedure available |
| 4.4.4A | The procedure is regularly reviewed to enhance effectiveness. | **Y** |  |  | Procedure for handling customer complaints and grievance/complaints handling procedure available |
| 4.4.5A | The procedure is communicated to the customers/ subcontractors/farmers/out growers. | **Y** |  |  | complaint Procedure had been made available to customers |
| **4.5** | **Input procurement:** |  |  |  |  |
| 4.5.1A | Procurement of inputs used in production, processing and packaging complies with legislative and customer requirements. | **Y** |  |  | Organization maintained a list of Registered service providers (Green life, Elgon). Purchase process based on LPO system. |
| 4.5.2A | Procurement policy is in place and implemented. Procurement is done from licensed dealers. | **Y** |  |  | Purchase and store procedure was maintained and made reference only to licenced dealers and companies. The organization procured items from Elgon, United Agrochemicals, Agrichem, EABL Amiran etc. |
| **4.6** | **Traceability:** |  |  |  |  |
| 4.6.1 | Traceability is the ability to trace a product from any given point through all stages. |  | | | |
| 4.6.2A | There is a traceability system that addresses raw materials procurement, product process and conditions. | **Y** |  |  | Traceability procedure SGLSF/014 available and well implemented. |
| 4.6.3A | The traceability procedure ensures the consumer is informed correctly on produce specifications and origin. | **Y** |  |  | Details available in the procedure. Customer contacts were available for their clients. |
| 4.6.4A | Every batch of produce is clearly marked from source and along the value chain to the point of sale such that the identification marks are not altered, or obliterated. | **Y** |  |  | Compliant |
| 4.6.5A | The operator has 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. | **Y** |  |  | Compliant |
| 4.6.6A | Each product is labeled in accordance with labeling regulations/requirements. | **Y** |  |  | Yes - Holex USA |
| 4.6.7A | Mechanism to ensure effective lot identification are in place. | Y |  |  | QC checks are done on product before arrival into the final cold-room ready for dispatch. |
| **4.7** | **Record Keeping and Documentation:** |  |  |  |  |
| 4.7.1A | A record keeping system is in place and records pertinent to this code are legible, readily identifiable and retrievable. | Y |  |  | Production and PH Records available |
| 4.7.2A | Records are maintained for a period of at least two years or as required by law. | Y |  |  | Records maintained for over 2 years |
| 4.7.3A | Employees charged with record keeping are trained to do so accurately and are supervised. | Y |  |  | Competence demonstrated for various records |
| 4.7.4A | Records are clearly written, dated and signed (including the name) by a responsible person. | Y |  |  | Visual observation |
| 4.7.5A | Records showing non-conformity with this code has been followed up with a written corrective action. | Y |  |  | Visual observation |
| 4.7.6A | Records are made available for inspection by authorized persons. | Y |  |  | Production and PH Records available |
| 4.7.7A | The operator has undertaken and documented at least one self-assessment annually | Y |  |  | Internal audit records available |
| 4.7.8A | Corrective actions generated from the self-assessment/ internal audit have been addressed and documented. | Y |  |  | Records available |
| **4.8** | **Quality policy** |  |  |  |  |
| 4.8.1A | The operator has a Quality policy in place. | **Y** |  |  | Policy available SGLSF/017 |
| **5.0** | **CULTURAL PRACTICES** |  |  |  |  |
| **5.1** | **Choice of variety of rootstock:** |  |  |  |  |
| 5.1.1A | The operator Procures registered varieties, rootstocks, seed stocks, including, plugs and liners from licensed sources for purposes of traceability. | **Y** |  |  | Procurement records available – Plantlab, Orange dumen, Stokman Rozen etc. |
| 5.1.2A | When selecting plant varieties, cultivars, seed stock the operator has considered the plant requirement. | **Y** |  |  | Demonstrated as compliant with respect to pest and disease tolerances |
| 5.1.3A | The propagules, seeds or any plant material for breeding purposes is certified, or from a recognized source and if imported is accompanied with a phytosanitary certificate issued by the competent authority at source. | **Y** |  |  | Phytosanitary documents available for all varieties on site. |
| 5.1.4B | Where sourced from own farm, the operator observes good agricultural practices and breeders’ rights. | **Y** |  |  | Visually observed |
| 5.1.5B | When selecting plant varieties for ornamental purposes in drought prone climates, preference is given to the production of native and/or xerophytic stocks. |  |  | **N/A** | Not a drought area |
| 5.1.6A | The operator has a written agreement with the customers detailing; breeder’s variety name, volumes and quantity specifications, batch number/other reference, seed or plant vendor. | **Y** |  |  | Documents on agreements were maintained. |
| 5.1.7A | The accompanying documentation shows that the nursery stock is fit for the purpose. | **Y** |  |  | Phytosanitary documents available for all varieties on site. |
| 5.1.8A | There is Documentary evidence of compliance to breeders’ rights as per the requirements of the International Union Protection of new Varieties of plants (UPOV). | **Y** |  |  | Documents on agreements with respect to royalty payments were maintained. |
| 5.1.9A | The propagation materials are sourced and traceable to licensed operators. | **Y** |  |  | Phytosanitary documents available for all varieties on site show they were acquired from licensed operators |
| 5.1.10 | The operator understands the characteristics of the variety and line specific genetic problems and provides documentation including GMO declaration. | **Y** |  |  | Documents were maintained showing GMO status of all varieties on site. No GMO’s were grown on site. |
| 5.1.11A | Breeders and propagators have protected open pollinated varieties, parental lines and F1 hybrids whenever needed and wherever this is practically possible. |  |  | **N/A** | No open pollinated varieties, parental lines and F1 hybrids on site |
| 5.1.12A | Accurate records that demonstrate the origin of the material are kept. | **Y** |  |  | Crop sourcing documents were maintained showing origin of each variety. |
| **5.2** | **Seed Treatments and Dressings:** |  |  |  |  |
| 5.2.1A | Where and when seed treatments are used by the operator, there are justifications for their use. |  |  | **N/A** | No seed used on site. No seed dressing |
| 5.2.2B | Seed treatment is correctly carried out and documented. |  |  | **N/A** | No seed used on site. No seed dressing |
| 5.2.3A | Seed treatments are only be used to prolong seed storage life or to reduce subsequent application of pesticides after germination. |  |  | **N/A** | No seed used on site. No seed dressing |
| 5.2.4A | The products used are recorded including name, the pest and/or disease and any other benefit is stated. |  |  | **N/A** | No seed used on site. No seed dressing |
| **5.3** | **Nursery Stock:** |  |  |  |  |
|  | Nursery stock has been inspected and issued with Phytosanitary inspection certificate by the competent authority. |  |  | **N/A** | No nurseries on site |
| 5.3.1A | **Seed.** |  |  |  |  |
|  | * If producing own seeds there's proof of seed certification process. * Multiplication of seed is traceable to breeder’s seed in compliance with the Seed Act Cap. 326 of the Laws of Kenya. |  |  | **N/A** | No seed production on site |
| 5.3.2 | **Vegetative material** |  |  |  |  |
| 5.3.2.1A | * Imported Vegetative material has a plant import permit from relevant regulatory agency and is accompanied by a phytosanitary certificate from the exporting country. * The material is inspected for compliance to the set regulations. | **Y** |  |  | Phytosanitary documents available for all varieties on site show they were acquired from licensed operators |
| 5.3.2.2A | Nursery stock for export is inspected in accordance to the requirements of the importing country and issued with a phytosanitary certificate from the competent authority before exportation. |  |  | **N/A** | No nurseries on site or production of stocks for export |
| 5.3.2.3A | The Operator ensures that the material complies with the World trade Organization Sanitary Measures (WTO-SPS) agreement and the latest version of the Internal Plant Protection Convention (IPPC) |  |  | **N/A** | No nurseries on site or production of stocks for export |
| 5.3.2.4A | The plants and all propagules are free of any visible signs of disease and pests. Whenever there are visible signs of pest and diseases, there is a written justification and the corrective action raised based on the contractual relationship between the parties. |  |  | **N/A** | No nurseries on site or production of stocks for export |
| 5.3.2.5A | Operators of vegetative or plant material nursery stock give suppliers quality guarantees which are documented |  |  | **N/A** | No nurseries on site or production of stocks for export |
| **5.4** | **Genetically Modified Organisms (GMOs)** |  |  |  |  |
| 5.4.1A | GMOs use is strictly in compliance with both the local regulations and that of the importing country countries. |  |  | **N/A** | The farm had maintained a GMO Declaration ref SGLSF/018 |
| 5.4.2A | The operator has copies of appropriate legislation governing growth and use of GMOs in both the country of production and that of the consumer. |  |  | **N/A** | No GMO production on site |
| 5.4.3A | Production of GMOs is done in agreement with individual customers/consumers prior to planting. |  |  | **N/A** | No GMO production on site |
| 5.4.4A | The Operator notifies all his customers on his own developments relating to the use and or production of products derived from GMOs. Such notifications are well documented. |  |  | **N/A** | No GMO production on site |
| 5.4.5A | GMOs and conventional plant materials have separate storage. |  |  | **N/A** | No GMO production on site |
| **5.5** | **Records and Documentation** |  |  |  |  |
| 5.5.1A | Operator has kept applicable Legislative/regulatory documents and crop production records. |  |  |  |  |
| 5.5.2A | Precise and up to date records on the following have been maintained   1. Origin, nature and quantities of inputs, ingredients, additives, preservatives etc. used. 2. Application rates and ratios of all inputs including the acreage. 3. Field operations from soil preparation through to harvesting. 4. Chemicals usage particularly related to application rates, dates of usage and pre-harvest intervals. 5. Nature, quantities and consignees of all agricultural products sold. | **Y** |  |  | Daily consumption fertilizer records seen for application of 23/3/25 and 22/2/25 contained all the details as per clause |
| 5.5.3A | Precise records for processing are maintained detailing;   1. The origin, nature and quantities of agricultural produce delivered to the unit. 2. The nature, quantities and consignees of products dispatched from the unit. 3. The origin, nature and quantities of any ingredients, additives, preservatives and processing aids delivered to the unit and the composition of the final product. | **Y** |  |  | Daily consumption fertilizer records seen for application of 23/3/25 and 22/2/25 contained all the details as per clause |
| 5.5.4A | the operator maintains records of important issues separate from the farm records including:   1. Labour and welfare records. 2. Storage and handling of plant protection products. 3. Field handling, post-harvest, package and packaging. 4. Environmental management plan. | **Y** |  |  | This was reviewed and found compliant. |
| 5.5.5A | **Records and documentation for propagation materials** |  |  |  |  |
|  | The record has;   1. The particulars and description of each commercial variety grown on the land including, line (code) breeder’s variety name, date developed, form of identification. 2. A disease and pest history for each variety listing treatments that have been carried out 3. The name and address of the farm and the date of sale or disposal of variety 4. Records are available for inspection on request by an authorized person. 5. Permission is given by authorized person to take copies of, or extracts from, the records. | **Y** |  |  | Seen on propagation spray record, spray done on 07/04/2025 on unit 17 |
| 5.5.6A | The propagator supplies the operator with cultivation information including   1. Variety 2. Age of plants 3. Storage period(if applicable) 4. Date planted, bedded or grafted 5. Any other relevant information. | **Y** |  |  | Seen on propagation spray record, spray done on 07/04/2025 on unit 17 |
| **5.6** | **Site Selection** |  |  |  |  |
| 5.6.1A | The operator has demonstrated the site is located in an area where horticulture cultivation is allowed or not restricted by competent authority. | **Y** |  |  | EIA report for current period submitted to NEMA on date 25.04.2025 |
| 5.6.2A | Farm plans and activities are drawn and done in accordance with Environmental Impact Assessments (EIA). Crop production areas are indicated in relation to staff housing, toilets, drinking water points, waste disposal sites, wastewater treatment points, utility stores and social facilities. | **Y** |  |  | Farm operations compliant |
| 5.6.3A | The records and justifications showing the suitability of the site for horticultural activity are available. | **Y** |  |  | Site risk assessment available SGLSF 020 |
| 5.6.4A | Selected site is not close to an area contaminated with industrial, domestic, faecal or organic wastes. | **Y** |  |  | Visual observation on regional map ref 01/2014 |
| 5.6.5A | A recording system is established for each field, orchard or greenhouse such that each is uniquely identified with a code/number. | **Y** |  |  | All greenhouse identified using unique codes |
| 5.6.6A | There is a farm plan showing the areas covered by each crop and all the agronomic activities in the areas. | **Y** |  |  | Visual observation on farm map ref 01/2014 |
| 5.6.7A | There is a unique identification or visual reference system for each production area, sector or greenhouses and farm map prepared. | **Y** |  |  | G.11 |
| 5.6.8A | Records of data showing non-conformity with the quality requirements specified in relevant standards are followed up with a written account of corrective measures taken. There is a corrective action plan giving strategy on how to deal with identified controllable risks in new agricultural sites. | **Y** |  |  | Available Site risk assessment |
| 5.6.9B | The severity and probability of each identified risk is indicated as well as the measures to control them. | **Y** |  |  | Available Site risk assessment |
| 5.6.10A | The site is not used for agricultural activities when the risk assessments identify non-controllable aspects that are critical to human health, the crop and the environment. | **Y** |  |  | Available Site risk assessment |
| 5.6.11B | Nurseries are evaluated for hazards and if found to high control measures are implemented. If control measures can not reduce these to acceptable levels, then operators do not use these nurseries. |  |  | **N/A** | No nurseries on site |
| **5.7** | **Crop rotations** |  |  |  |  |
| 5.7.1B | Where rotations are practiced, there is a rotation plan or program, which is documented. |  |  | **N/A** | Perrenial crops |
| 5.7.2B | Where rotations are not practiced there is a written documented justification for lack of the practice. | **Y** |  |  | Justification given as perennial crops |
| 5.7.3B | Rotations are exempted where crops grown are perennial or where substrates are used. |  |  | **N/A** | Perennial crops available |
| **5.8** | **Soil and substrate management** |  |  |  |  |
| **5.8.1** | **Mapping** |  |  |  |  |
| 5.8.1.1C | Operator has prepared soil maps for the entire farm. A soil survey is done and a map developed on the basis of the soil profiles and soil analyses. Records are kept on soil type(s) and site(s) | **Y** |  |  | Soil maps available dated January 2025 |
| 5.8.1.2C | Planning rotations and growing plans is on the basis of the soil maps. |  |  | **N/A** | Perennial crops available |
| **5.8.2** | **Cultivation** |  |  |  |  |
| 5.8.2.1A | A Good Agricultural Practice (GAP) policy that preserves soil structure and minimizes soil compaction is maintained. | **Y** |  |  | GAP policy available dated 01.03.2025 |
| 5.8.2.2A | The method chosen for tillage is one that preserves soil structure and minimizes soil compaction. | **Y** |  |  | Production done on raised beds. |
| 5.8.2.3C | Use of machinery that minimizes the formation of hard pans is particularly encouraged on the farm. | **Y** |  |  | no use of heavy machinery in production. |
| **5.9** | **Soil erosion** |  |  |  |  |
| 5.9.1A | The operator has 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 e.t.c i.e. good agricultural practices. | **Y** |  |  | Crops grown in greenhouse |
| 5.9.2A | Agricultural activities on steep slopes have incorporated soil conservation measures. The operator demonstrates that they have carried out a program of appropriate techniques for soil conservation with the view of reducing soil erosion. | **Y** |  |  | Visual observation |
| 5.9.3A | The operator demonstrates the application of technical criteria for land preparation, choice of equipment and tools to prevent soil erosion. | **Y** |  |  | Visual observation |
| 5.9.4A | There is no cultivation on slopes greater than 35 %, along riverbanks, lake shores, or in designated water catchment areas. | **Y** |  |  | Visual observation |
| 5.9.5B | Soil drainage systems are developed, well-maintained and adequate enough to deal with rainfall and runoff. | **Y** |  |  | Visual observation |
| **5.10** | **Substrates** |  |  |  |  |
| 5.10.1A | Substrates used are certified by a competent authority as fit for purpose and comply with substrate supplier specification. substrate is accompanied with a certificate of analysis from a recognized institution. The substrate is traceable to an acceptable source and is not be obtained from conservation areas. |  |  | **N/A** | No substrates in production |
| 5.10.2C | Operators who use substrates are advised to recycle and avail documentation indicating their suitability. |  |  | **N/A** | No substrate recycling |
| 5.10.3B | Where substrates are used and recycled, there is documentation on quantities used and dates of recycling. Where the substrate is not recycled justification is provided. |  |  | **n/a** | No substrate recycling |
| 5.10.4A | Recycled substrates are treated/sterilized before re-use. Substrate sterilization has been done in an environmental friendly way. |  |  | **n/a** | No substrate recycling |
| 5.10.5A | Where substrates are used, steaming is the preferred option for sterilization. |  |  | **n/a** | No substrate treatments on site |
| 5.10.6A | Where chemicals are used to sterilize substrates for reuse, the following has been recorded: location of sterilization, date, type of chemical used, method of sterilization and person performing the sterilization. |  |  | **n/a** | No substrate treatments on site |
| 5.10.7A | There is documentation to show the location of the treatment, the method of treatment, date of sterilization, the active ingredients if any, the machinery, the operator etc. |  |  | **n/a** | No substrate treatments on site |
| **5.11** | **Irrigation** |  |  |  |  |
| 5.11.1B | Operators to demonstrate understanding of the physical concepts of soil-water relations, which enable water requirements to be accurately estimated. | **Y** |  |  | Farm manager knowledgeable on water estimation methods |
| 5.11.2B | There is a documented irrigation plan to optimize water usage and minimize wastage. | **Y** |  |  | SFGSF/029 available |
| 5.11.3C | Water management is supported by documentation on calculations of crop water requirements, and weather data records e.g. from rain gauges, evaporation pan readings, etc. | **Y** |  |  | Tensiometer records in place for April 2025 |
| 5.11.4A | Operators maintain valid water abstraction permits where applicable and in accordance with the Water Act Cap. 372, 2002. | **Y** |  |  | Abstraction permits available ref WRA/20/KAB/2EB/3/G |
| 5.11.5A | Operators have put in place measurement devices and maintain records of water consumption particularly of ground water | **Y** |  |  | Automation used in irrigation |
| 5.11.6B | Records indicate the date and volume per unit area of the irrigation unit. Where there are irrigation programs, the calculated and actual irrigated water volume is recorded. | **Y** |  |  | Records available |
| **5.12** | **Irrigation and fertigation method** |  |  |  |  |
| 5.12.1B | Operator demonstrates understanding of the most water efficient means of irrigation and fertigation for the particular types of crop production. | **Y** |  |  | Drip irrigation |
| 5.12.2A | The most efficient and practical water delivery system is used to ensure rational utilization of water resources. | **Y** |  |  | Drip irrigation |
| 5.12.3B | Field personnel are trained to recognize and rectify irrigation system leakages & breakages and remedial actions are taken promptly to avoid water wastage. | **Y** |  |  | Training records available for operators. Qualified Technicians / plumbers available on site e.g. Staff no. |
| 5.12.4A | Irrigation/Fertigation water is abstracted only from sustainable sources and approved by all the agencies mandated to manage water resources. | **Y** |  |  | Only commissioned and licened boreholes used. |
| 5.12.5C | The operator endeavors to harvest rainwater and recycle water used within their farms to reduce reliance on natural water sources. | **Y** |  |  | 7 reservoirs are available and in use. |
| **5.13** | **Quality of irrigation water** |  |  |  |  |
| 5.13.1A | There is a irrigation/fertigation water risk assessment reviewed at least annually or when changes to water sources or delivery system occur and encompasses potential microbiological, chemical or physical pollution of the water sources. | **Y** |  |  | Irrigation/fertigation water risk assessment available SGLSF027 |
| 5.13.2B | The irrigation/fertigation water analysis is performed by an accredited laboratory. The results of such analysis are well documented and where corrective actions are recommended, the nature of the corrective actions is stated, documented, and acted upon. | **Y** |  |  | Analysis conducted and accepatble |
| 5.13.3B | Any adverse results obtained are acted upon and the corrective actions documented. |  |  | **N/A** | No adverse results have been received |
| 5.13.4A | The quality of water both at the intake and exit points is 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 is considered as a basic step in developing a management plan. | **Y** |  |  | Records available |
| 5.13.5A | Water used in hydroponic culture is changed frequently, or when recycled, is treated to minimize microbial and chemical contamination. |  |  | **N/A** | No recycling done |
| 5.13.6A | Water delivery system is maintained and cleaned, as appropriate to prevent microbial contamination of water. | **Y** |  |  | Records available |
| 5.13.7A | Untreated sewage water and effluent is not used for irrigation purposes. | **Y** |  |  | No use of untreated sewage water seen on water management plan |
| 5.13.8C | Construction and maintenance of artificial wetlands is encouraged as they provide very efficient and cost-effective cleaning and decontamination of wastewater. | **Y** |  |  | Wetland available |
| 5.13.9A | The operator provides training to managers and workers in the implementation of the Agricultural Production Plans, water quality management and water resource conservation protocols and procedures. | **Y** |  |  | Records available as part of professional trainings. |
| 5.13.10A | Irrigation water consumption records are kept. | **Y** |  |  | Records available |
| 5.13.11A | Records of risk evaluation of irrigation water on crops are kept. | **Y** |  |  | Records available |
| **5.14** | **Water use efficiency** |  |  |  |  |
| 5.14.1B | The operator has installed irrigation system that minimizes water consumption. | **Y** |  |  | Drip system |
| 5.14.2A | The operator maintains records for water consumption per unit of production over time and endeavors to utilize water in such a way that there is no net increase in water consumption. | **Y** |  |  | Records available |
| 5.14.3C | Irrigation application is be based on existing and expected plant water use. Monitoring of water supply and demand is carried out. | **Y** |  |  | Records available |
| 5.14.4A | The operator has identified production processes that are optimized to reduce consumption and waste water. | **Y** |  |  | Compliant |
| 5.14.5A | The operator conserves water through the use of effective water delivery systems, conservation and monitoring methods and techniques. | **Y** |  |  | Compliant |
| 5.14.6A | Water meters and measuring gauges are installed to determine water consumption. | **Y** |  |  | Compliant |
| 5.14.7A | The operator has a detailed site water balance analysis defining irrigation and other farm water requirement. | **Y** |  |  | Compliant |
| 5.14.8A | Operator has put into place water monitoring methods to accurately monitor water use and minimize any losses. | **Y** |  |  | Compliant |
| 5.14.9A | Operator has put into place means of determining the crop water needs. | **Y** |  |  | Compliant |
| 5.14.10A | Operator monitors water consumption for different production activities in each production area. | **Y** |  |  | Records available |

|  |  |  |  |  |
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| **6.0** | **PLANT NUTRITION AND FERTILIZER USAGE** |  |  |  |
| **6.1** | **General:** The operator carries out periodic monitoring of soil nutrients and substrates. | **Y** |  | Compliant |
|  |  |  |  |  |
| 6.1.1A | The application of fertilizers has been based on nutrient requirements of crop, appropriate routine analysis of nutrients levels in the soil or nutrient solution, knowledge of soil and/ or on receipt of technical advice. | **Y** |  | Compliant |
| 6.1.2A | Records of fertilizers stocked and used on the farm have been maintained. | **Y** |  | Records available in ERP |
| 6.1.3A | Operators have demonstrated knowledge regarding quantities and type of fertilizer used. | **Y** |  | Records available |
| 6.1.4A | The fertilizer application equipment have been kept in good condition and calculated to ensure accurate application. | **Y** |  | Records available |
| 6.1.5A | Raw untreated or treated human sewage sludge has not been used on cropped areas. | **Y** |  | Observed Compliant |
| 6.1.6A | Fertilizers have been stored in a facility/ defined area that gives protection for stock and where there is minimum risk to employees and environment. Appropriate measures have been taken to avoid pollution of natural water bodies. | **Y** |  | Not near a water body |
| 6.1.7A | Fertilizer stocks have been stored separate from fresh produce and stacked correctly. | **Y** |  | Observed Compliant |
| 6.1.8A | Safe working conditions and practices have been implemented in the fertilizer stores. | **Y** |  | Observed Compliant |
| **6.2** | **Organic fertilizers** |  |  |  |
| 6.2.1C | The use of organic manure is encouraged for maintenance and improvement of soil fertility. It is composted and stored in an appropriate manner to contain the risk of contamination of the environment and stored in a designated area away from water sources. | **Y** |  | Compliant |
| 6.2.2C | Where organic fertilizer is used, a documented risk assessment has been carried out before use, and has considered the source and characteristics of the fertilizer risks of disease transmission, weed seed and method of composting. | **Y** |  | Compost risk assessment |
| 6.2.3C | Where organic fertilizer is used, a documented risk assessment has been carried out before use and has considered the source and characteristics of the fertilizer, risk of disease transmission, weed seed and method of composting. | **Y** |  | Records available |
| 6.2.4A | There are records on site, crop and date of application, as well as the analysis results and the nutrient calculations of the organic matter. | **Y** |  | Records available |
| 6.2.5B | The analysis has been carried out by a nationally recognized laboratory to determine the content of NPK in the organic manure/fertilizer. | **Y** |  | Records available |
| **6.3** | **Fertilizer use** |  |  |  |
| **6.3.1A** | A written fertilization plan has been developed based on Plant, water and soil analysis which is regularly conducted | **Y** |  | Records available |
| 6.3.2A | No organic or inorganic fertilizer has been applied within six meters of any water channel or source. | **Y** |  | Compliant |
| 6.3.3A | There has been no direct drainage to any water source of runoff water from land where fertilizers has been applied. | **Y** |  | Compliant |
| 6.3.4B | The person in charge of fertilizer application and the operators demonstrates understanding on matters relating to fertilizers and their use. | **Y** |  | Compliant |
| 6.3.5A | Trained and competent employees are responsible for fertilization program. | **Y** |  | Training Records available |
| 6.3.6A | There is proof of competence in fertilizer management and where it is lacking, training has been given by qualified personnel. | **Y** |  | Training Records available |
| 6.3.7A | Inorganic fertilizers used on the farm have a fertilizer profile detailing chemical content. | **Y** |  | Records available |
| **6.4** | **Records of application** |  |  |  |
| 6.4.1B | Records of fertilizer application show details of the geographical areas, name and reference of the field, greenhouse where the crop is located. | **Y** |  | Records available |
| 6.4.2A | A recording system has been 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. | **Y** |  | Records available |
| 6.4.3A | The date of any application of soil/nutrient solution fertilizers has been documented (recorded) | **Y** |  | Records available |
| 6.4.5A | Documents of the exact amounts applied have been signed by a supervising authority. | **Y** |  | Records available |
| **6.5** | **Application machinery** |  |  |  |
| 6.5.1A | The fertilizer application machinery has been well maintained and calibrated according to specifications to ensure accurate delivery. | **Y** |  | Records available |
| 6.5.2A | All machinery, including spraying machines, have a log book, showing maintenance, regular calibration checks, and dates of service. | **Y** |  | Records available |
| **6.6** | **Timing and frequency** |  |  |  |
| 6.6.1B | The quantity of fertilizer applied has been calculated to optimize benefits and minimize nutrient losses and is based on soil analysis. | **Y** |  | Records available |
| 6.6.2B | The operator has taken into consideration the stage of growth of the crop as well as the weather conditions prevailing at the time of the intended application. | **Y** |  | Records available |
| **6.7** | **Fertilizer storage** |  |  |  |
| 6.7.1A | Fertilizer store is covered, banded and is rodent-proof. The fertilizer is placed on a raised surface and located away from water sources. | **Y** |  | compliant |
| 6.7.2A | There is a well-managed fertilizer stock inventory indicating the contents of the store, types and amounts and is regularly updated. | **Y** |  | Records available |
| 6.7.3A | Fertilizers are stored separately from pesticides, produce, food and feedstuffs, nursery stocks and any living quarters. They are adequately protected from weather elements in a clean and dry area. | **Y** |  | Compliant |
| 6.7.4A | Where stored together with pesticides, they are in separate compartments and are well labelled. | **Y** |  | Compliant |
| 6.7.5A | Fertilizers are stored away from concentrated acids; such acids are stored separately in lockable rooms. | **Y** |  | Compliant |
| 6.7.6A | All hazard and risk areas are clearly indicated and correct hazard warnings posted in clear and understandable forms in English and Kiswahili and the local language where applicable. The warnings are prominently displayed both inside and outside the entrance to the store. | **Y** |  | Compliant |
| **7.0** | **CROP PROTECTION** |  |  |  |
| **7.1** | **Pests and diseases.** | **YES** | **NO** | **N/A** |
| 7.1.2A | Where alternative exists, the operator has selected varieties which have some level of tolerance or resistance to pests and diseases of commercial concern. | **Y** |  | Pest tolerance and resistance was maintained for varieties e.g Dinara – tolerant to Downey Mildew, Moody Blue – tolerant to AgroBacterium |
| 7.1.3A | The operator has a scouting procedure to ensure plant pests and diseases are managed. | **Y** |  | Procedure available ref. SGLSF/036 |
| 7.1.4 | The following principles shall be observed for propagation materials: |  |  |  |
| 7.1.4.1 | **Sanitation** |  |  |  |
|  | 1. A documented sanitation **procedure** is available. 2. Entry to greenhouses and nurseries is restricted anda disinfection foot bath is provided at the entrance. 3. Cutting tools are d**isinfe**cted regularly during use. The disinfectant is changed regularly. 4. Loose dust in propagation units is contained. 5. Water used in **nurseries is treated** with either chlorine, calcium hypochlorite, copper sulphate, aluminum sulphate, UV light or ultra-filtration before use. 6. Personal protective **equipment is** provided for each propagation unit/section to prevent cross-contamination. 7. Movement from one propagation unit/section to another is restricted. 8. 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. 9. Planting trays/crates/bags are disinfected before use. | **Y** |  | General Cleaning procedure ref SGLSF/052 available and well implemented. Sampled activities include disinfection of cutting tools, PPE use and restriction of movement between production units. |
| 7.1.4.2 | **Control of diseases and pests** |  |  |  |
|  | 1. Diagnostic tools for various diseases and pests are available. 2. Uses an accredited diagnostic laboratory (internal or external) for plant pests, diseases, soil and water analysis. 3. A double door system is in place in all propagation units to minimize entry of pests and diseases. 4. Soil and propagation units are fumigated/steamed/disinfected using applicable technologies before use and after a number of propagation cycles. 5. Operator Is using certified planting material. 6. Regular scouting is carried out and where pests and diseases are detected timely management is done appropriately. 7. All persons entering propagation units/sections are wearing clean and appropriate protective clothing as per PPE policy. | **Y** |  | Compliant |
|  | **In addition to breeding purposes the following apply:** |  |  |  |
| 7.1.5 | Disinfection of benches, working knives and hands is being done. | **Y** |  | compliant |
| 7.1.6 | Plants that are suspected of, or diagnosed as having disease are isolated. | **Y** |  | compliant |
| 7.1.7 | Cultivation system is in clean medium. | **Y** |  | compliant |
| 7.1.8 | Plants are grown in a system that is not allowing cross contamination with surrounding soils. | **Y** |  | compliant |
| 7.1.9 | Propagation unit floors and pathways are covered or concreted to ensure no contact with soils. | **y** |  | compliant |
| 7.1.10 | Operator ensures that plants are taken care of to minimize disease and pest risk to other plants in the breeding/propagating/growing facility and the surrounding farms. | **Y** |  | compliant |
| 7.1.11 | The operator is implementing defined hygiene protocols to ensure disease free material. | **Y** |  | compliant |
| **7.2** | **Pest and disease management** |  |  |  |
| 7.2.1A | Operator has demonstrated knowledge of registered crop protection products applicable to the crop. | **Y** |  | Only PCPB approved chemicals used e.g Spirox, |
| 7.2.2A | Operator has implemented integrated pest management strategies to keep pest levels below economically damaging thresholds. | **Y** |  | IPM management plan ref SGLSF/035 available and implemented. Cultural methods – sticky traps, weed control, pest and disease-free substrates. |
| 7.2.3A | Records of past history of pests and disease occurrence are used to predict and develop an action plan to manage pests and diseases. | **Y** |  | Records available |
| 7.2.4A | Operator has a crop protection program that is being implemented. | **Y** |  | Done daily based on scouting records |
| 7.2.5A | The implementation of the integrated pest management strategy is being supervised by a technically competent person where viable. | **Y** |  | Records available |
| **7.3** | **Pest control products use** |  |  |  |
| 7.3.1 | **Soil fumigation.** |  |  |  |
| 7.3.1.1B | Alternatives to chemical soil fumigants have been explored before resorting to their use. |  | N/A | No soil fumigation / treatments done on site |
| 7.3.1.2B | Use of fumigants is minimized and when used there are documented records for use including location, date, active ingredients, doses, method of application, operators name written and justification for their use. |  | N/A | No soil fumigation / treatments done on site |
| 7.3.1.3A | Only chemicals registered by a competent authority are used in the production process. |  | N/A | No soil fumigation / treatments done on site |
| 7.3.2 | **Resistance management** |  |  |  |
| 7.3.2.1A | Products are chosen to avoid over reliance or continued use of any single chemical grouping to prevent development of pesticide resistance. | **Y** |  | Alternative use of systemic vs contact chemicals in management of diseases and pests. |
| 7.3.2.2B | Pesticides are not be applied in adverse weather conditions such as wind, rain, high mid-day temperatures or during overhead irrigation. | **Y** |  | Application records show compliance – spray early in the morning |
| 7.3.4A | **Procurement of pesticides** |  |  |  |
| 7.3.4.1A | Procurement of pesticides is done ensuring that they are:   1. Registered by the Pest Control and Products Board (PCPB). 2. From licensed dealers. 3. Accompanied with material safety data sheet. | **Y** |  | Supplied by Elgon, Osho, Green life Amiran .Accompanied by MSDS**.** |
| 7.3.4.2A | A list of approved pesticides used on the farm is in place detailing the active ingredients and the supplier. | **Y** |  | Fully compliant |
| 7.3.5 | **Transport of pesticides and hazardous chemicals** |  |  |  |
| 7.3.5.1A | A written procedure for transport of pesticides has been developed and communicated to all involved in the transportation of pesticides. | **Y** |  | Transportation Chemical Procedure SGLSF/037 |
| 7.3.5.2A | Drivers and turn-boys have been trained in emergency procedures in case of an accident, fire, spillage and direct pesticide contact with persons. Proof of training by a recognized organization is available. | **Y** |  | David Odero employ 10510 |
| 7.3.5.3A | Pesticides are not transported together with food, animal feed or general consumer goods. They are transported in a suitable, self contained box or container. | **Y** |  | compliant |
| 7.3.5.4A | Vehicles used to transport pesticide are furnished with suitable equipment and materials such as protective clothing, fire extinguisher, sand, and shovel among others to deal with emergencies. |  | **N/A** | Pesticides pumped centrally |
| 7.3.6 | **Storage of pesticides, hazardous chemicals and biologicals** |  |  |  |
| 7.3.6.1A | Pesticides are stored in secure, well lit and ventilated stores. Shelves are made of non-absorbent materials. Where storage is in cupboards, the shelf have a front lip to prevent containers from falling out on opening the doors. | **Y** |  | Visual assessment |
| 7.3.6.2A | No other commodities are stored with pesticides. | **Y** |  | compliant |
| 7.3.6.3A | Access to pesticide store is limited to suitably authorized personnel. Pesticides are not accessible to children and animals and away from foodstuffs, fires, stoves or lamps. | **Y** |  | Approved list of personnel with access available |
| 7.3.6.4A | The pesticide store is licensed by PCPB. | **Y** |  | Licence available |
| 7.3.6.5A | Warning signs in applicable language are displayed at the entrance of the pesticide store including **NO SMOKING, NO NAKED FLAMES** among others. | **Y** |  | Compliant |
| 7.3.6.6A | Stock taking is done regularly and stock records maintained. | **N** |  | Physical and Bin card balances for Miteking – 126 litres, system values – 130.6 litres. |
| 7.3.6.7A | Storekeepers have received training on safe and responsible use of pesticides. |  |  | Done in September 2024. Trained By Unisafe |
| 7.3.6.8A | Procedures for events such as accidents, fire, spillage or poisoning of personnel are documented and displayed in applicable languages at accessible areas. | **Y** |  | Visual Assessment |
| 7.3.6.9A | Stores are equipped with adequate and appropriate firefighting equipment and maintenance records on fire extinguishers are available. | **Y** |  | Service is valid |
| 7.3.6.10A | Shelves in stores are made of non-absorbent material. Materials to deal with leakage and spillage are available in the store (sand, shovel, broom and empty disposal bin). | **Y** |  | Metallic |
| 7.3.6.11A | There are adequate washing facilities in or near the store. | **Y** |  | compliant |
| 7.3.6.12A | The store is banded to contain any spillages and contaminated water used for cleaning or firefighting. | **Y** |  | compliant |
| 7.3.6.13A | Drainage is to a sump or adequate waste water treatment facility which is situated far from all water sources and does not drain into riparian land. They are adequately marked or labeled. | **Y** |  | compliant |
| 7.3.6.14A | All personnel working in pesticide stores have access to suitable Personal Protective Equipment. | **Y** |  | compliant |
| 7.3.6.15A | Pesticides and fertilizers are stored separately, and away from detergents or disinfectants. | **Y** |  | compliant |
| 7.3.6.16A | Pesticide store is located away from water sources. | **Y** |  | More than 15 km |
| 7.3.7 | **Selection of pest control products** |  |  |  |
| 7.3.7.1A | Pesticides used comply with both the local regulations and that of the country to which the produce is destined. | **Y** |  | PCPB registered |
| 7.3.7.2A | The operator consults regularly and is aware of restrictions on pesticides used and has documentation on such restrictions. | **Y** |  | PCPB Notices |
| 7.3.7.3A | Pesticides classified as **Extremely Hazardous** and **Highly Hazardous** (WHO Class Ia and Ib) are only used in justified circumstances and where no viable, economic alternative exists. |  | **N/A** | Not used |
| 7.3.7.4A | The technical person responsible for pesticide choice and application is competent by training. | **Y** |  | Consultant used – Moshe Yosef, Agronomic Engineer, 32 years’ experience. |
| 7.3.7.5A | There is documented justification to show that the choice of pesticide is appropriate for the intended purpose. | **Y** |  | Trial records available for all chemicals in the list. |
| 7.3.7.6A | Over reliance on pesticides with similar mode of action is avoided where repetitive applications are required to eliminate pest resistance. | **Y** |  | Rotational use of chemicals against same pest noted. |
| 7.3.7 | The application rate of pesticides per given area and the dilution rates complies with recommendations on the product label. Where a choice exists, a product that is safer to handle and has less environmental impact is chosen. | **Y** |  | Compliant |
| 7.3.7.8 | There is documentation to show that the correct dosage of the pesticide for the intended crop has been followed in line with label instructions | **Y** |  | Compliant |
| 7.3.7.9A | Pesticide application methods (ultra-water, vapor polarization etc.) are considered before pesticides selection. | **Y** |  | Vapor polarization |
| 7.3.8 | **Dispensing of pesticides and hazardous chemicals** |  |  |  |
| 7.3.8.1A | There is 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. Suitable containers for pre-mixing of pesticides/chemicals 5. Clear marking on all equipment to indicate they are for use with pesticides/chemicals only. | **Y** |  | Compliant Visual observation |
| 7.3.8.2A | Adequate and appropriate personal protective clothing and equipment a worn by those persons doing the dispensing | **Y** |  | Visual assessment |
| 7.3.9 | **Advice on quantity of pesticide application** |  |  |  |
| 7.3.9.1A | Recommendations on application of the pest control products are given by persons of demonstrable competence attained through training and relevant documentation availed. | **Y** |  | Consultant used – Moshe Yosef, Agronomic Engineer, 32 years’ experience. |
| 7.3.9.2B | Determination of the quantities factors in the velocity of application, the surface area to be applied, pressure of the application system and the speed of application. The related documentations is available. |  |  | Calibration done by SMART Crop |
| 7.3.10 | **Application of pesticides and protection of workers** |  |  |  |
|  | The following requirements are to be implemented by growers/exporters: |  |  |  |
| 7.3.10.1A | Employees are given information, instruction, training and guidance to carry out their work and are aware of the risks to health from exposure to pesticides and the precautions to be taken. | **Y** |  | Records available |
| 7.3.10.2A | Signs to restrict personnel access to area under pesticide application or treated with pesticides are displayed. | **Y** |  | Compliant |
| 7.3.10.3A | All spray operators and supervisors are trained on the application and risks of pesticides by a recognized institution or body. A training schedule for the operators and supervisors is available. | **Y** |  | Records available dated October 2024 |
| 7.3.10.4A | * All spray operators wear personal protective clothing and equipment suitable for the risk at hand and this is provided by the employer without charge. * Spray operators do not wear personal home clothing when spraying. * Secure well-ventilated storage for personal clothing is available. * PPEs have designated area for washing, drying and storing. * Appropriate dressing rooms and double individual lockers for each worker are provided. | **Y** |  | Compliant |
| 7.3.10.5A | All workers involved in application and handling of pesticides are provided with waterproof overalls as well as appropriate respirators, which are changed regularly according to manufacturer’s recommendations. Application is timed so as to avoid the hottest hours of the day. Minimum safety band to natural water bodies and employees is observed. | **Y** |  | Compliant , Sonny Konya Issued on 11.01.2025 |
| 7.3.10.6A | After applying pesticides, spray operators remove all protective clothing and take a shower. Facilities with soap, towel and water are made available. | **Y** |  | Compliant |
| 7.3.10.7A | All waterproof personal protective clothing and equipment are rinsed immediately after use in an area where the rinsing water is channeled to chemical wastewater treatment facility. Protective overalls if continuously used are laundered after each use and stored in a hygienic well-ventilated location on the farm. | **Y** |  | Compliant |
| 7.3.10.8A | All staff involved in the use and application of organophosphate and carbamate pesticides have medical checkups at least twice per year. The checkup includes sampling of blood cholinesterase levels compared with baseline level determined 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 are available for audit purposes. In the event of adverse results, the doctor’s advice shall be followed. Guidelines on organo- phosphate poisoning, monitoring and treatment are available within the farm. Spray operators not applying these organo- phosphate and carbamate pesticides have a medical checkup at least once a year. | **Y** |  | Compliant |
| 7.3.10.9A | All equipment used for spraying is regularly inspected, well maintained, calibrated and serviced. Defective equipment is repaired and/or replaced immediately and verified by a competent person. | **Y** |  | Calibrations done |
| 7.3.10.10A | Each pesticide application is 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. | **Y** |  | Records available |
| 7.3.10.11A | Warning signs are 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. | **Y** |  | Visual Assessment |
| 7.3.10.12A | Material safety data sheets of all pesticides used are filed and available. | **Y** |  | MSDS present for al present. |
| 7.3.10.13A | Spray mixing and application are only carried out by trained personnel. No expectant and nursing mothers or persons under the age of 18 years handles, mixes or applies pesticides. Female workers are discouraged from handling pesticides. | **Y** |  | Visual assessment |
| 7.3.10.14A | Partly used containers are returned to the store with caps and lids properly replaced. All returns are documented. | **Y** |  | Chemical movements recorded |
| 7.3.10.15A | Pesticides with a high leaching potential or high aquatic toxicity are not used within 200 meters of open water sources, dams, lakes, rivers. |  | **N/A** | Not Used on Site |
| 7.3.10.16A | Documented re-entry policy and procedure are displayed at appropriate places as preventive measure to avoid employee’s health risk. | **Y** |  | Available in both English ref SGLSF/039 |
| 7.3.10.17A | Pesticide application ensures that non target organisms such as bees are not harmed. | **Y** |  | Sprays done only in covered production so no drift to harm biodiversity |
| **7.3.11** | **Records of application** |  |  |  |
| 7.3.11.1A | Pest control products application records specify the name and variety of crop treated, the geographical area, name and or reference of the farm, the field, greenhouse 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. | **Y** |  | Sampled applications were found ok |
| 7.3.11.2A | Pest control product application records include the name of the spray operators and supervisors, equipment used, dosage rates, crops and reason/justification for use and re-entry intervals and signed by an authorized technical person. | **Y** |  | Records found satisfactory as above. Justification based on scouting and threshold levels. |
| 7.3.11.3A | Detailed spray records includes; treated area and any incidents such as equipment failure, spillage of chemicals etc. The records also has the name of the pest, disease(s) or weed(s) treated. | **Y** |  | No incidents. |
| 7.3.11.4A | The re-entry interval and time for all the crop protection products applied is indicated and recorded. | **Y** |  | Yes, Records available |
| 7.3.11.5A | 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 is available. | **Y** |  | Rotation programme available. Staff redeployed in other departments. Sonny Konya records reviewed. |
| 7.3.11.6A | A spray supervisor log book is maintained and includes records of PPEs and dates of issue. | **Y** |  | Reviewed records for sampled sprayers P. No. 12719, 13554, 11898 had been issued with Proper PPE |
| 7.3.11.7A | All spraying machines have a log book showing maintenance, regular calibration checks , dates of services etc. | **Y** |  | Compliant |
| 7.3.11.8A | There is a documented accident and incident diary for all accidents and emergency incidents such as spillage, poisoning cases, sicknesses, absences from work and the remedial actions taken. | **Y** |  | All accidents reported and recorded in the accident register. Reviewed records from 2024-2025 were found effectively handled as per the WIBA Act. |
| 7.3.11.9A | Notices, emergency procedures, contact persons and institutions (in case of fire, spillages and direct contact of chemicals with humans or animals) are posted. | **Y** |  | Emergency contacts had been displayed in notice boards. |
| 7.3.11.10A | There are trained first Aid Personnel within the premises and records of training are available. | **Y** |  | First aiders last trained October 2025 |
| 7.3.11.11A | There are records of obsolete or expired pesticides and empty containers. | **Y** |  | Procedure ref SGLSF/041 available and effective. |
| 7.3.11.12A | Other records and documentation available in addition to those required by the laws 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 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, disposal records and classification. Information about Pesticide, product labeling and requirements are as shown in Annex D. | **Y** |  | Updated stock records available, list of persons with access also available, Updated chemical list available on site, no WHO Class 1a and 1b used on site. |
| 7.3.12 | **Application equipment** |  |  |  |
| 7.3.12A | Measuring equipment and facilities are 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. | **Y** |  | Graduated jars, calibrated scales available. |
| 7.3.13 | **Disposal of surplus pesticides** |  |  |  |
| 7.3.13.1A | Written procedures for safe disposal of dilute pesticides and empty containers are developed, approved and communicated to all those handling such chemicals. The procedure include fail-safe measures to prevent pollution of ground-water and soil from leakage or spillage. |  |  | Procedure ref: SGLSF/041 available. |
| 7.3.13.2A | Disposal of concentrates, obsolete and expired pest control products is done through approved NEMA agents and records are available. Obsolete and expired pest control products are clearly segregated and marked obsolete and expired pest control products. | **Y** |  | SHE Consultants  NEMA approval ref NEMA/WM/LTW/10478 valid upto 13.11.2025 |
| 7.3.13.3A | Disposal sites for chemicals is at least 500 meters from surface water and at least 250 meters from boreholes. |  | **N/A** | No chemical disposal sites |
| 7.3.13.4A | Disposal sites are securely fenced, locked and labeled with warning signs. |  |  | Compliant |
| 7.3.13.5A | If surplus mix is sprayed on untreated part of the crop, recommended dosage shall not be exceeded and the treatment recorded appropriately. |  | **N/A** | No surplus mixes |
| 7.3.13.6A | Personal protective gear is available for all staff involved in pesticide disposal. | **Y** |  | No chemical disposal sites |
| 7.3.13.7A | Records of disposal of expired pesticides, excess pesticides, and pesticide containers are available. | **Y** |  | Compliant |
| 7.3.13.8A | Where disposal services are outsourced, the disposal agent is approved by NEMA and waste disposal records are available. | **Y** |  | SHE Consultants  NEMA approval ref NEMA/WM/LTW/10478 valid upto 13.11.2025 |
| 7.3.14 | **Empty pest control products containers** |  |  |  |
| 7.3.14.1A | Pest control products containers are not be reused. | **Y** |  | Procedure ref: SGLSF/041 available |
| 7.3.14.2A | There is a secure storage point for empty containers and safe handling systems to ensure non-exposure to persons and animals. All containers are clearly and adequately labelled. | **Y** |  | Visual observation |
| 7.3.14.3A | The disposal system respects the legislation governing the same and takes due regard to the safety of flora and fauna. | **Y** |  | Compliant |
| 7.3.14.4A | Empty pest control products containers are triple rinsed and the rinsed is poured into the spray tank and the container punctured and crushed. Plastic containers are disposed as per NEMA regulations. | **Y** |  | Compliant |
| 7.3.15 | **Unwanted pest control products** |  |  |  |
| 7.3.15B | There is documentation regarding excess or unwanted products which may be accepted back by the supplier if in good condition and in sealed, original packing. They are labeled and separated securely within the store. |  | **N/A** | No unwanted PPP on site |
| 7.3.16 | **Application of pesticides by shippers/cargo handlers and consolidators** |  |  |  |
| 7.3.16A | Where shippers/cargo handlers and consolidators use pesticides in their operations for pest management, the provisions for section 7 apply to them with the necessary amendments. |  | **N/A** | Site is for producer activities only |
| 7.3.17 | **Pesticide residue analysis** |  | **N/A** |  |
| 7.3.17.1C | There is a deliberate effort based on risk assessment to minimize pesticide residues through periodic residue analysis. (Pre-harvest and post-harvest sampling and analysis is highly recommended). |  | **N/A** | Not required as per risk assessment |
| 7.3.17.2C | The operator is able to provide objective evidence/records kept of such residue testing done by an accredited laboratory. Residue test records are traceable back to the batch/consignments, grower and to produce production site. |  | **N/A** | Not required as per risk assessment |
| 7.3.17.3C | The operator is able to produce evidence of residue testing and document the results of such analysis for at least 2 years. |  | **N/A** | Not required as per risk assessment |
| 7.3.17.4C | The operator has a written action plan in the event of the Maximum Residue Level (MRLs) being exceeded. |  | **N/A** | Not required as per risk assessment |
| **8.0** | **HARVEST AND POSTHARVEST HANDLING OF PRODUCE** |  |  |  |
| **8.1** | **Packaging and harvesting containers.** |  |  |  |
| 8.1.1A | Produce containers are strictly for the produce and not any other use e.g. chemicals, plant debris, etc. color codes, symbols or any other means are used to distinguish containers for various uses. | **Y** |  | Harvesting containers are color coded Red. |
| 8.1.2 A | Temporary or mobile holding or grading facilities ensure that the produce is handled hygienically. Animals and children are excluded from the area. Hygiene inspection records are available. | **Y** |  | Temporary holding sheds available and hygienic |
| 8.1.3A | Procedures of storage and stock control of packaging materials are done in a manner that will sustain a high status of hygiene and cleanliness. Packaging materials are held in areas protected from rodents, insects and other pest access and are designed to protect the packaging from adverse weather. | **Y** |  | Visual assessment, Rodent and insect control observed |
| **8.2** | **Pack house premises** |  |  |  |
| 8.2.1A | Pack houses comply with all relevant national laws relating to working conditions including environmental, fire, electrical, mechanical and structural safety. Pack houses are in good structural condition. The area around the pack house is free from rubbish, unserviceable equipment, weeds, etc. the pack house is not used for activities not related to packing of produce. | **Y** |  | Compliant |
| 8.2.2A | The operator processes and packs 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.) | **Y** |  | Workplace ref: NKU/0005691/10/24/R valid upto 04/10/2025 |
| **8.3** | **Construction of pack house** |  |  |  |
| 8.3.1A | Construction of the pack house is done such as way to prevent the entry of domestic animals, insects, birds, rodents among others. Effective control measures are in operation and are fully documented. | **Y** |  | Compliant |
| 8.3.2A | Floors, doors and wall surfaces are made of impervious, non-absorbent, non-toxic, washable materials, which are easy to clean and disinfect. Floors are durable and allow easy drainage without leaving wet areas. Windows and doors open and close easily. | **Y** |  | Compliant |
| 8.3.3A | Ceiling and overhead fixtures are designed, constructed and finished to prevent the accumulation of dirt, growth of undesirable moulds, shedding of paint flakes or particles and also reduce condensation. | **Y** |  | Compliant |
| 8.3.4A | Ceiling and overhead fixtures that can be opened to the outside environment are fitted with insect proof screens of appropriate mesh size. | **Y** |  | Compliant |
| 8.3.5A | There is a glass and hard plastics handling policy to govern their use within the premises. | **Y** |  | Compliant |
| 8.3.6A | The use of glass is avoided and where used, there is a form of screening to prevent any glass from contaminating the produce. All use of glass (windows, light, etc.) is recorded and a system of inspection implemented to ensure that any breakages are rectified. | **Y** |  | Glass and hard plastics procedure ref: SGLSF /043b fluorescent tubes covered |
| 8.3.7A | Lighting over inspection, grading and cold store areas is adequate to allow effective inspection of produce. | **Y** |  | Compliant |
| 8.3.8A | The pack house has adequate ventilation in order to provide adequate air circulation and temperature control. | **Y** |  | Compliant |
| 8.3.9A | The height of grading tables and other facilities for work is appropriate for the comfort of the workers. | **Y** |  | Compliant |
| 8.3.10A | Loading and dispatch areas are roofed and proofed so as to prevent the nesting of birds. | **Y** |  | Compliant |
| **8.4** | **Forklift** |  |  |  |
| **8.4A** | Forklifts with internal combustion engines are not used in restricted spaces holding produce as they can result in spoilage of produce. Electric forklifts are preferred. Only fully trained operators use forklifts. | **Y** |  | Compliant |
| **8.5** | **Incompatible goods** |  |  |  |
| **8.5A** | All items incompatible with produce including cleaning agents, lubricants among others, are stored in designated areas away from produce to prevent taint, ethylene damage or cross contamination of produce. | **Y** |  | Kept in main store |
| **8.6** | **Product integrity** |  |  |  |
| **8.6A** | Operators ensure the integrity of product consignment throughout the handling phases including storage, transportation, repackaging (where necessary) and loading into a freight vessel. | **Y** |  | Adequate traceability controls to maintain product integrity observed**.** |
| **8.7** | **Machinery** |  |  |  |
| **8.7A** | Machinery are designed to prevent contamination of the product, are readily cleaned and well maintained. | **Y** |  | List of machinery used on farm in place. Sampled machines for review were.   * Cold stores cooling system * Generators * Spray pump   Machines maintained as scheduled. |
| **8.8** | **Harvesting hygiene (applicable to growers, breeders and propagators)** |  |  |  |
|  | Workers are trained and supervised closely to ensure that the produce is harvested in the right way and at the correct maturity or cut stage. Training and supervision procedures are documented. | **Y** |  | Harvesting trainings done sampled done. Supervisory procedures well documented |
| 8.8.1A | The farm has a documented hygiene procedure/protocol for handling of produce premises on the basis of a risk assessment, workers trained and evidence for these are available. | **Y** |  | Procedure available ref: SGLSF/046. All staff trained |
| 8.8.2A | There is a regular hygiene risk assessment of harvesting operations. | **Y** |  | Risk Assessment ref: SGLSF/047 available. Reviewed satisfactory. |
| 8.8.3A | The containers, harvesting tools and other harvesting equipment that are continuously used are appropriately cleaned, disinfected and maintained in line with the hygiene procedures/protocols. | **Y** |  | Done continuously, found satisfactory. |
| 8.8.4A | The washing program ensures that produce harvest containers are cleaned and free from contamination. | **Y** |  | Done daily continuously |
| 8.8.5A | Cleaning water is free from microbial, heavy metal or other foreign body contaminants and if recycled it is treated before reuse. | **Y** |  | Lab test results available tests results acceptable |
| 8.8.6A | Procedures and training programs ensure that all workers involved in handling of produce observe high standards of personal hygiene. Facilities including field toilets with hand washing facilities are provided and kept clean. | **Y** |  | Handwash provide with portable water. |
| 8.8.7A | To avoid contamination of produce, field supervisors ensure that all workers involved in handling of produce are in good health and that field workers with communicable diseases are not knowingly employed in field operations. Employees are instructed to report to the supervisor if they are suffering from any illness either on arrival at work or during work hours. | **Y** |  | Screening and return to work policy. |
| 8.8.8A | Smoking, eating, chewing and drinking is not be permitted in the immediate vicinity of harvesting, grading, packing or storage operations. Signs are displayed to this effect. | **Y** |  | Warning signs well displayed |
| **8.9** | **Measures for produce safety at receipt** |  |  |  |
| 8.9.1A | A detailed and precise process flow that ensures that every unit or batch of the produce received is clearly marked in a manner to enable the produce to be easily traced from the receipt, through handling process, to dispatch point is in place. Such a system is monitored and reviewed periodically for effectiveness. | **Y** |  | SGLSF/ 014A Process flow available in the traceability procedure |
| 8.9.2A | The produce is received by trained and competent personnel capable of carrying out independent inspection on 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 is documented to indicate unconditional acceptance, further sorting or rejection. | **Y** |  | QC at intake and online competencies reviewed and found satisfactory |
| **8.10** | **Requirements for produce inspection** |  |  |  |
| 8.10.1A | Although inspection of produce for quality is a continuous process in certain designated areas, inspection is mandatory at:   1. Reception at the pack house; 2. Quality-control during processing; 3. Final quality check when ready for dispatch; and 4. Loading area. | **Y** |  | Compliant |
| 8.10.2A | Final product check involves the following:   1. Identity of product, lot/batch number, grower and/or pack house identity, date and packing code; 2. Essential information such as flower type, variety and post-harvest treatment; and 3. Actual quality code and weight or counts of individual pack units.   **Note: operators shall provide documented traceability for produce and operations.** | **Y** |  | Ref SGLSF/97 Dispatch quality checks document. |
| **8.11** | **Quality control** |  |  |  |
| 8.11.1A | The operator has a quality assurance system. Quality control unit is within the vicinity of the pack house and equipped with quality control facilities, equipment, procedures, standards and records as required. | **Y** |  | Compliant |
| 8.11.2A | All measuring devices have the necessary accuracy as required for inspection purposes. All equipment used for weighing, sizing, temperature monitoring or any other measuring devices are calibrated regularly and records maintained. | **Y** |  | Scale calibration done; cooling equipment serviced |
| 8.11.4A | Quality systems are audited at least annually or more frequently based on risk assessment. The audit is documented and made available for inspection by recognized institutions when required. | **Y** |  | KEPHIS Report dated 10.05.2025 reviewed and found Ok. |
| 8.11A | The policy and procedure for addressing customer complaints is documented and implemented. All customer complaints are investigated and action taken as appropriate, to prevent recurrence. | **Y** |  | No external complaints, internal complaints – changing room decongestion during corona timelines. Sorted by added more changing rooms. |
| 8.11.6A | Records of data showing non-compliance with the quality requirements specified in the quality system are followed up with written account of corrective measures taken. | **Y** |  | Records available |
| 8.11.7A | Operators ensure personal hygiene of produce handlers. | **Y** |  | Compliant |
| 8.11.8C | HACCP principles are used to set up a system of managing product quality. A risk assessment or own farm inspection is done when determining the process flow and its associated systems. This assessment considers areas where health hazards to the produce may occur and also areas where quality aspects of the produce are likely to be affected. This includes preventing contamination from foreign bodies such as pieces of string, glass, metal, hair, nails, knives, other produce etc. these assessments are documented periodically. | **Y** |  | compliant |
| **8.12** | **Recall/withdrawal procedure** |  |  |  |
|  | A recall procedure is in place and evidence of mock recall records are available for self-assessment and on farm inspection purposes. Rejected produce is referred back to the operator for disposal or reworking. | **Y** |  | Recall procedure available. Mock recall test done last on 22.04.25 found adequate**.** |
| **8.13** | **Produce handling** |  |  |  |
| 8.13.1A | Produce at different stages of preparation is kept separate. The floor lay out allows for a smooth flow of produce from reception to finishing area, with adequate separation of raw materials from finished products. Waste materials are removed regularly. | **Y** |  | Compliant |
| 8.13.2A | Produce is normally processed on “First In, First Out” (FIFO) basis unless there are quality, maturity or hygiene attributes identified for particular batches on receipt that indicate otherwise. Produce traceability is ensured throughout the process chain and records maintained. | **Y** |  | FIFO demonstrable in the traceability procedure |
| 8.13.3A | The integrity of product consignment is ensured by the operator throughout the phases of handling including storage, transportation, repackaging where necessary, and loading into a freight vessel. | **Y** |  | Observation |
| 8.13.4A | All certified products are clearly identifiable as “**certified”** |  | **N** | Not Indicated on transactional documents – Invoices, Delivery notes, Packing lists |
| **8.14** | **Pack house hygiene** |  |  |  |
| 8.14.1A | Pack house operations are geared towards implementing quality management systems and good hygiene practices. | **Y** |  | Visual assessment, cleaning , hygiene and training records available |
| 8.14.2A | Routine and general cleaning procedures for the facilities and equipment’s are documented, monitored and evaluated for effectiveness. | **Y** |  | Cleaning procedures and schedules ref: SGLSF/052 |
| 8.14.3A | There is a documented and up to date risk assessment that covers the hygiene aspects of the produce handling operations. | **Y** |  | Hygiene risk assessment available |
| 8.14.4A | A hygiene procedure is implemented on the basis of the risk assessment. | **Y** |  | Observed compliant. |
| 8.14.5A | Workers have access to clean toilets, appropriate waste disposal bins and hand washing facilities in the vicinity of their place of work. | **Y** |  | Clean toilets noted, cleaning records available , handwash facilities provided |
| 8.14.6A | Work table tops, knives and cutting boards are maintained in sound condition and kept clean at all times. | **Y** |  | Cleaned daily using NaOCl |
| 8.14.7A | Workers are given basic instructions on hygiene before handling produce. The operators ensure that the workers comply with the hygiene instructions. | **Y** |  | Compliant |
| 8.14.8A | Fumigation or heat treatment of pallets and containers is done in compliance with the relevant legislation including but not limited to the Public Health Act CAP 242 and Plant Protection Act CAP 324 of the Laws of Kenya. |  | **N/A** | No fumigation/ heat treatment done |
| **8.15** | **Post-harvest washing** |  |  |  |
| 8.15.1A | Water for post-harvest washing is filtered and re-treated if recycled |  | **N/A** | No PH washing done |
| 8.15.2A | Based upon risk assessments, water for post-harvest washing is analyzed on a regular basis by accredited laboratory to ascertain its freedom from microbial, chemical and physical pollutants. Corrective measures are taken in case of non-compliance and records on this kept. |  | **N/A** | No PH washing done |
| 8.15.3B | All waste water where possible is recycled. |  | **N/A** | No PH washing done |
| **8.16** | **Post-harvest treatments** |  |  |  |
| 8.16.1A | Use of post-harvest treatments is justified and documented. | **Y** |  | Justification – to increase vase life,  Documented |
| 8.16.2A | Use of post-harvest treatments is recorded and used in compliance with the product label requirements. Permitted post-harvest chemicals and waxes are only used if no alternative exists to maintain good produce quality. | **Y** |  | Application records – TOG6, Chrysal, |
| 8.16.3A | There is a record of all the post-harvest treatment products in use. All post-harvest treatment products used are approved by competent authority. | **Y** |  | TOG 6 - PCPB(CR)2124  Chrysal - PCPB(CR)0922 |
| 8.16.4A | The technically responsible person for post-harvest treatments is competent | **Y** |  | Charles – Production Manager, Trained in postharvest handling and care of cutflower by Amiran Kenya 21.05.2014 - 18 years’ experience. |
| 8.16.5A | The batch/lot of treated produce is appropriately documented as is the geographical area, the name or reference of the farm or produce handling site where the treatment was undertaken. | **Y** |  | Compliant |
| 8.16.6A | * The exact dates of applications, type of treatment used, trade name and active ingredients of the products used/applied (in volume or weight) are recorded in the post-harvest treatment application records. * The operator is also be recorded. | **Y** |  | Operator details seen recorded for sampled applications done on week 12,15,and 20 of 2025 |
| **8.17** | **Cold chain Management** |  |  |  |
| 8.17.1A | Cold chain facilities are available, and are in satisfactory structural condition of adequate cleanliness. | **Y** |  | Compliant |
| 8.17.2A | Recommended produce temperature, and humidity are documented and maintained at all times. | **Y** |  | Temperature monitoring procedure Ref: SGLSF/054 available Cold room - temperature monitored continuously, Truck temperatures monitored. |
| 8.17.3A | Harvested produce is moved from the field into cool, preferably refrigerated conditions as quickly as possible. Produce temperature is reduced uniformly as fast as possible. | **Y** |  | 10 minutes in a covered transport |
| 8.17.4B | Pre-coolers are maintained in accordance with the manufacturer’s recommendations. The cold store can be opened from the inside while the door screens permit vehicle loading with minimum increase in produce temperature. | **Y** |  | Gierrhoffs in charge |
| 8.17.5A | The cold stores are cleaned, disinfected and if found necessary through risk assessment, are fumigated on a regular basis and records maintained. | **Y** |  | Cleaning records available for review |
| 8.17.6A | Transportation system includes facilities for maintaining produce temperature at the recommended level. Records are kept at every phase of dispatch.( Refrigerated transport is highly recommended.) | **Y** |  | Flower movers used |
| 8.17.7A | Equipment in the cold chain for temperature measurement with the required calibration status is in place to provide regular monitoring. Situations outside normal holding temperatures are reacted to and corrected as fast as possible. Monitoring results and any corrective actions taken are recorded and kept. | **Y** |  | Gierrhoffs calibrated the equipment |
| 8.17.8A | Produce handlers such as drivers and freight forwarders have written instructions on maintaining temperature levels. | **Y** |  | SGLSF/054 |
| **8.18** | **Packaging material** |  |  |  |
| 8.18.1A | Operators ensure packaging and other materials in contact with the produce do not cause contamination. Packaging materials safeguards product quality, safety and integrity and is in conformance to the Kenya Standards of Packaging Produce. | **Y** |  | Fertilizer was NOT stored together with packaging materials. |
| 8.18.2A | Procedures of storage and stock control of packaging materials are done in a manner that will sustain a high status of hygiene and cleanliness. Packaging material is held in areas protected from rodent, insect and other pests. The facility is designed to protect the packaging material from any adverse weather. | **Y** |  | Compliant |
| 8.18.3A | Whilst adhering to their customer’s requirements, management is committed to the use of environmentally friendly packaging materials that can be recycled in the importing country. Packaging material is in conformance to the corresponding customer requirements and legal provisions. | **Y** |  | Done according to [Directive 94/62/EC on packaging and packaging waste](https://www.eea.europa.eu/policy-documents/directive-94-62-ec-on) |
| 8.18.4A | Polyvinyl chloride and other chlorinated plastics are not be used as packaging material or as sheeting for greenhouses. | **Y** |  | Compliant |
| 8.18.5B | To avoid produce damage, proper stacking and securing of packaged produce is ensured through written instructions to the cold chain handlers and freight forwarder. | **Y** |  | Stacking protocols adhered to. |
| 8.18.6A | Where cartons are used, they are assembled correctly with tabs fully locked in position. | **Y** |  | Visual Assessment |
| 8.18.7A | Hazards from packaging material hazard are mitigated through a risk assessment and measures are in place for the control of each identified hazard. The risk assessment findings are documented. | **Y** |  | Risk Assessment SGLSF/055 in place for packaging material hazards. |
| **8.19** | **Cleaning materials** |  |  |  |
| **8.19A** | Materials used for cleaning are those approved for use and are stored and maintained in a designated area away from produce and other non-cleaning chemicals. Adequate facilities are provided for cleaning and disinfecting of work tools and equipment. Cleaning chemicals are scent-free. | **Y** |  | Chlorine |
| **8.20** | **Additional requirements for cut flowers** |  |  |  |
| 8.20.1C | Cut flowers are placed as soon as possible into clean buckets of water containing the recommended preservatives to maintain flower freshness. | **Y** |  | Compliant |
| 8.20.2A | The flower preservative types, dosage rates, measuring, mixing procedures and means of disposal are recorded. | **Y** |  | Compliant |
| 8.20.3A | Flowers are dyed with food grade dyes only where applicable. |  | **N/A** |  |
| 8.20.4C | Disposal of flower preservative treatment is done as in Annex G. |  | **N/A** |  |
| 8.20.5B | The boxes are assembled correctly and, where staples are used they are inserted properly. Members of staff are trained on correct box assembly. | **Y** |  | Stapler Machine used |
| 8.20.6A | A minimum of 5 cm gap between the flower ends and the box is maintained during packing and the flowers held securely with an appropriate cross tie. The boxes are not overfilled and the exterior banding of the box shall be at the right tension. | **Y** |  | Compliant |
| 8.20.7A | The pre-cooling vents are correctly aligned. | **Y** |  | Compliant |
| 8.20.8B | Harvesting is done as per maturity stage. At no time is harvested produce exposed to direct sunlight. | **Y** |  | Done as per harvesting procedure, product transported in covered flower movers |
| **8.21** | **Post-harvest handling by consolidators, shippers and cargo handlers** |  |  |  |
| 8.21.1A | Where consolidators, shippers and cargo handlers operate pack houses the provision of 8.1 to 8.19 applies to them with the necessary amendments. |  | **N/A** | Production activities only |
| 8.21.2A | The shipper/cargo handler/ consolidator/ has records of all inputs, sales and deliveries and have up-to-date certificates from each supplier. If certified ingredients are imported, the shipper/ cargo handler/ consolidator/ has transaction certificates for each consignment he/she has received, or some other method of proving traceability. |  | **N/A** | Production activities only |
| 8.21.3A | The shipper/ cargo handler/ consolidator ensures that product consignment does not come into contact with chemical cleaning materials. |  | **N/A** | Production activities only |
| **9.0** | **HEALTH, SAFETY AND HYGIENE** |  |  |  |
| **9.1** | **Health** |  |  |  |
| 9.1.1A | Health requirements are followed to ensure that personnel and visitors who are in direct contact with the produce are not likely to contaminate them | **Y** |  | PPE, Hygiene procedures implementation |
| 9.1.2A | Potable water that complies with KS 459 is available to staff at all times. Containers or outlets of water unsuitable for drinking is be appropriately marked. | **Y** |  | Lab test results acceptable |
| 9.1.3A | The work stations are provided with sufficiently stocked first aid kits and have personnel trained in first aid to deal with emergencies. | **N** |  | FA kits are not fully stocked. available. Inspected monthly. – GH 6, Packhosue |
| 9.1.4A | Written accident and emergency procedures on how to deal with serious injuries requiring medical attention are displayed clearly, permanently and prominently with contact person and telephone number | **Y** |  | Displayed in notice boards and public areas. Emergency contacts available. |
| 9.1.5A | Changing rooms and worker-seating areas with sufficient clean toilets, hand washing facilities and soap are provided. | **Y** |  | Visual observation – Main gate and Graders changing rooms |
| 9.1.6C | A survey of health conditions of the personnel is done in accordance with the existing health policy. |  |  | Compliant |
| 9.1.7A | There is a safe and hygienic work culture that establishes controls to address and minimize risks | **Y** |  | PPE, Reentry no use of class1a & 1b |
| **9.2** | **Hygiene and safety of workers** |  |  |  |
| 9.2.1A | Staff suffering from any communicable disease report to their immediate supervisor and are not allowed to work on produce until a medical officer clears their condition and certifies them as fit to resume duty. | **Y** |  | Return to work records available after employees are diagnosed. Cleared by the Nurse |
| 9.2.2A | Access to post-harvest handling areas is restricted. Authorized visitors entering the pack house are only allowed after briefing on hygiene requirements and on being provided with appropriate protective clothing. A record of all visitors to the pack house is maintained, | **Y** |  | Compliant |
| 9.2.3A | There are hygiene facilities / sanitary units. for Workers which are separate for both sexes and adequate to their numbers. Latrines are not located on riparian land or near water sources. | **Y** |  | Male Toilets - 40  Female Toilets – 56  Handwash facilities provided. |
| 9.2.4A | Adequate hand washing facilities are conveniently accessible and are kept in a clean and hygienic condition. Signs to remind workers to wash their hands after toilet use are in place. | **Y** |  | Visual Observation and employee interviews ok. |
| 9.2.5C | Where possible, suitable rest rooms and a canteen with cooking, eating and storage facilities are provided. The eating and storage facilities are separated from the working areas. | **Y** |  | Compliant |
| 9.2.6B | Employees whose work entails standing for long periods are provided with facilities for sitting to enable them to take periods of rest. | **Y** |  | Seating facilities provided in grading hall |
| 9.2.7C | There is occupational health and safety training to the workers on the farm. Other training including family planning, first aid, basic health care, hygiene, accident prevention, preventative medicine and HIV/AIDS awareness are done. | **Y** |  | Training done on induction for all staff. Continuous training done on the farm by the various select committees. |
| 9.2.8B | Employees working with machinery or processes likely to cause bodily injury are fully instructed on possible dangers and the precautions are observed. | **Y** |  | Flower movers, motorcyclists and tractor operators are trained on how to operate the equipment. |
| 9.2.9A | All machinery is fully guarded and well maintained records of maintenance and servicing kept | **Y** |  | Spray pump house and fertigation pump house equipment were well guarded. |
| 9.2.10A | These Precautions are observed; 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. | **Y** |  | Firefighting equipment service period valid, designated smoking zone noted. |
| 9.2.11A | Signs and displays on hygiene requirements are available | **Y** |  | Visual observation |
| 9.2.12A | Food provided to workers is safe and nutritious | **Y** |  | Compliant |
| 9.2.13A | Safety and hygiene information on use of common areas such as canteen, bathroom, changing room, parking lots among others are available | **Y** |  | Compliant |
| **9.3** | **Health and safety measures** |  |  |  |
|  | There is a coherent policy for Occupational Safety, Health and Working Environment that conforms to ILO Convention No 155 part 4 and 11 as well as to internationally accepted health and safety standard established and maintained by management and workers representatives. | **Y** |  | Compliant |
| 9.3.1A | Machinery used is suitable for its purpose, equipped with operational safety devices with regular inspections and maintenance carried out and records maintained. | **Y** |  | Machine maintenance schedule available and implemented for all machines. operational safety achieved by having trained operators |
| 9.3.2A | Employees are trained on safe use of equipment. and records kept . | **Y** |  | OK - sampled were Flower mover operators are trained on how to operate the equipment. |
| 9.3.3A | Fire extinguishers and other appropriate firefighting equipment are easily accessible and regularly maintained. Fire alarms are fitted on each floor above the exit and there is evidence of evacuation drills. | **Y** |  | Fire equipment service well serviced by September 2025 |
| 9.3.4A | Emergency exits are clearly marked and are fitted with fire safety break locks | **Y** |  | Visual observation |
| 9.3.5A | Relevant safety rules and precautionary safety measures are clearly displayed. | **Y** |  | Visual observation |

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| **10.0** | **LABOUR, EMPLOYEMENT AND SOCIAL ISSUES** |  |  |  |
|  | Social objectives shall be planned, implemented, monitored and recorded through a Social Management System. The operator (in this section referred to as the employer) shall document, implement and provide records of the social management activities undertaken. | **Y** |  | **Compliant** |
| **10.1** | **Wages** |  |  |  |
| 10.1.1A | To ensure the welfare of workers, all employers shall abide by the regulation of wages and conditions of Employment Act, and any other laws which affect the welfare of workers. | **Y** |  | Employer uses Employment Act and the AEA - KPAWU CBA REF 2023-2025 |
| 10.1.2A | 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 high. | **Y** |  | Payment made on end month mainly. Sampled renumeration for P. No. 10510 and Sonny Konye 12719 were found within the legal requirements. |
| 10.1.3A | No deductions of any sort other than the statutory requirements may be made from employee’s wages without mutual agreement. | **Y** |  | Only statutory deductions made – NSSF, SHIF, NHDF Levy |
| 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 work of equal value Hiring, compensation and access to benefits must be on the basis of ability and job responsibilities. | **Y** |  | Compliant |
| 10.1.5A | 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. | **Y** |  | Bonuses and incentives awarded using the daily target as a baseline reviewed was 10475 – 33.16 hrs overtime hrs worked and paid. |
| 10.1.6A | 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. | **Y** |  | OT – P. HOUSE only. Sampled OT reviewed was 10475 – 33.16 hrs overtime hrs worked and paid.  The system used to calculate the OT was Paymaster |
|  | Employers shall make the mandatory deductions and remit monthly contributions in accordance with legal provisions. | **Y** |  | February 2025   * NSSF 15th * SHIF 9th * PAYE 9th |
| 10.1.8A | 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. |  | **N/A** | Workers provided with housing allowance – 2800 |
| **10.2** | **Staff recruitment and promotions** |  |  |  |
| 10.2.1A | Staff shall be recruited and promoted based on their ability to perform work. | **Y** |  | Reviewed documents for JC P.No - 14422 reviewed and found satisfactory recruited on 18.03.2025 as a Greenhouse GW |
| 10.2.2A | 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. | **Y** |  | Spray operations and areas handling fertilizers and acids not handled by female, staff, interns and apprentices |
| 10.2.3A | Expectant mothers shall not be dismissed, discriminated against on the basis of pregnancy or expected to undertake work that may harm the mother or the unborn child. | **Y** |  | Compliant |
| **10.3** | **Induction and training** |  |  |  |
| 10.3.1A | All personnel shall receive basic and relevant induction, training and orientation. | **Y** |  | Induction training documents were available for JC P.No - 14422 on date 14.03.2025. |
| 10.3.2A | All personnel shall receive job specific training to allow them to work safely and fulfill their roles and responsibilities. | **Y** |  | Cultural practices, Sanitation, and harvesting training administered to all GW, supervisors trained in supervisory skills. Records adequate. |
| **10.4** | **Work contracts** |  |  |  |
| 10.4.1A | All employees, including those 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. | **Y** |  | Sampled for JC P.No - 14422 reviewed and found satisfactory recruited on 18.03.2025 as a Greenhouse GW Contracts in place. |
| 10.4.2B | Work contracts maybe 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. | **Y** |  | Reviewed GW contact extensions valid. |
| 10.4.3A | Use of a fixed-term contracts “casual labor” to evade labor or NSSF laws shall be avoided. | **Y** |  | Compliant |
| **10.5** | **Work hours and leave days** |  |  |  |
| 10.5.1A | Employers must provide transport when employees work outside normal working hours. | **Y** |  | Bus transport provided as per CBA 2800 Minimum |
| 10.5.2C | Employers may provide transport or transport allowance for the employees. | **Y** |  | In contract and CBA |
| 10.5.2A | In every period of seven (7) days a period of rest comprising at least one rest day (paid) must be provided. | **Y** |  | In contract and CBA |
| 10.5.3A | All permanent and contract staff shall be entitled a 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. | **Y** |  | CBA – 25 &26 days leave for staff under / over 5 years – reviewed contract was for Empl. No. 12129 |
| 10.5.4B | All seasonal workers/ must be entitled to leave on a pro-rata basis. | **Y** |  | Sampled for JC P.No - 14422 reviewed and found satisfactory recruited on 18.03.2025 as a Greenhouse GW Contracts in place |
| 10.5.5A | An employee shall be entitled to sick leave and this is only to be granted on production of a certified letter of incapacity signed by a qualified medical practitioner as per the employment act CAP 226 | **Y** |  | In contract and CBA |
| 10.5.6A | The employees shall be entitled to the statutory maternity/paternity leave on a full pay or as provided for by a collective bargaining agreement. The employee will not incur any loss of privileges for reason of being on such leave. | **Y** |  | In contract and CBA |
| **10.6** | **Pregnant and nursing mothers** |  |  |  |
| 10.6.1A | Women on ante and post-natal periods shall not be discriminated with regard to recruitment, selection or termination of a particular job. | **Y** |  | Visual observations and union representative interview |
| 10.6.2B | There shall be safe facilities for nursing mothers to feed infants and a caretaker to keep the children while mothers are working. Time shall be given to nursing mothers to feed their infants. | **Y** |  | One hour before work for breastfeeding |
| **10.7** | **Termination** |  |  |  |
| 10.7.1A | Each farm/company shall have legally validated internal regulations of working and labor conditions, which should include, among others, proper regulation of warnings and procedures for dismissals. | **Y** |  | Proper regulation of warnings and procedures for dismissals available in the manual, with reference to the CBA and Employment Act 2007 |
| 10.7.2A | 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. | **Y** |  | Sampled file 13179 Summarily Dismissed after absconding duties . Process is handled as per requirements. |
| **10.8** | **Workman’s compensation** |  |  |  |
| 10.8.1A | 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. | **Y** |  | WIBA Cover Policy available ref 01/01/115/0119/2022 Mayfair Insurance Co. Ltd |
| 10.8.2A | Compensation claimed shall be disallowed if it is proved that the injury was attributable to the serious and willful misconduct of the employee. | **Y** |  | Compliant |
| **10.9** | **Freedom of association and participation** |  |  |  |
| 10.9.1B | Workers have the right with regard to the law to establish and to join labor unions of their own choice, without prior permission. Where no unions are in place workers have a right to form a workers welfare committee. | **Y** |  | CBA in place AEA-KPAWU ref 2023-2025 |
| 10.9.2C | Workers representatives will not be subjected to discrimination and will have access to all workplaces necessary to carry out their representation functions. | **Y** |  | Interview with the general workers |
| 10.9.3A | The operator shall provide an enabling environment for workers committee/union to perform their duties. This shall be as per the recognition agreement between the Union, management and employer associations where applicable. | **Y** |  | Union officials meet during working hours without victimization. |
| 10.9.4C | Workers committee/union shall participate in collective bargaining. | **Y** |  | KPAWU membership observed |
| 10.9.5 | Where a collective bargaining is negotiated, it shall be in accordance with the Labor Institutions Act 2007 and Labor Relations Act 2007. | **Y** |  | CBA in place AEA-KPAWU ref 2023-2025 |
| **10.10** | **Grievance and disciplinary procedures** |  |  |  |
| 10.10.1A | 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 labor and social issues. | **Y** |  | Each section has a Shop-Steward, Gender Committee Representative to effectively handle/follow up on their grievances. |
| 10.10.2A | Clear written firm rules, grievance and disciplinary procedures shall be developed, implemented, communicated, explained to the workers and accepted by all parties involved. | **Y** |  | Grievance procedure displayed in the notice board for all staff. Approved by management and Union reps. |
| 10.10.3A | Complaints regarding labor and working conditions shall be handled as per the firm grievance handling procedure. | **Y** |  | Changing room decongestion process and separate changing rooms for supervisors and general staff |
| 10.10.4A | Employers shall provide a formal procedure for solving disputes in the workplace within a specified time frame. | **Y** |  | Grievance procedure displayed in the notice board for all staff. Approved by management and Union |
| 10.10.5A | Deduction of wages as disciplinary measure is not acceptable. | **Y** |  | Available in the HR Manual and alluded to in the CBA. |
| **10.11** | **Forced labor** |  |  |  |
| 10.11.1A | The operator shall not make use of forced labor or coerce anyone to work against his/her will. | **Y** |  | No use of forced labor or coercion on site. |
| 10.11.2A | Workers shall not be required to lodge or deposit their original identity papers with their employer. | **Y** |  | No such requirement on site |
| 10.11.3A | The workers shall decide to join and leave the company on personal and voluntary basis as per the contractual agreement. | **Y** |  | Contracts in place detailing onboarding and separation procedures. |
| **10.12** | **Discrimination/harassment** |  |  |  |
| 10.12.1A | The operator shall not engage in or support discrimination, intimidation or coercion in any form including but not limited to ethnic origin, religion, gender, race, HIV status, marital status union membership or political affiliation. | **Y** |  | Procedure available in the HR manual and posted on notice boards ref: FS/POL1 |
| 10.12.2A | 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. | **Y** |  | Procedure available in the HR manual and posted on notice boards |
| 10.12.3A | 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. | **Y** |  | Ethics and anticorruption policy available and implemented ref CSR Policy |
| 10.12.4A | Employees shall also have equal access to training based on training needs. | **Y** |  | Ethics and anticorruption policy available and implemented ref CSR Policy |
| 10.12.5A | Employees shall also have access to training on equal terms. | **Y** |  | Ethics and anticorruption policy available and implemented ref CSR Policy |
| **10.13** | **Child labor/minors** |  |  |  |
| 10.13.1A | No children (persons under 18 years of age) shall be employed gainfully for any duty or task in the work place or his/her labor is deemed to be the labor of that other person for the purposes of payment. 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. | **Y** |  | No body under 18 on farm. Child labour policy in effect**.** |
| 10.13.2A | Work must not restrict educational opportunities for children. |  | **N/A** | No children employed on site |
| **10.14** | **Out-growers/out-grower associations/subcontractors** |  | **N/A** | Not an out grower site |
| 10.14.1A | Operators shall formulate and implement a fair purchasing policy with their out growers. |  | **N/A** | Not an out grower site |
| 10.14.2A | There shall be written, legally binding agreements between the operators and all out growers covering product, volumes, and frequencies of collection, pricing, grades and obligations. |  | **N/A** | Not an out grower site |
| 10.14.3B | The operator must take responsibility for providing full technical advice where such need is perceived to out growers prior to starting crop production. |  | **N/A** | Not an out grower site |
| 10.14.4B | 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. |  | **N/A** | Not an out grower site |
| 10.14.5A | The operator shall ensure that out-growers are aware of, and implement the relevant principles and requirements of this code of practice. |  | **N/A** | Not an out grower site |
| 10.14.6B | All out-growers must be paid in cash or by a mutually agreed monetary arrangement and be supported with proper and adequate documentation. |  | **N/A** | Not an out grower site |
| 10.14.7B | A firm shall be responsible for its operations including contracted activities conducted by its sub-contractors. |  | **N/A** | Not an out grower site |
| 10.14.8A | Sub-contractors working on farm/company site shall be briefed on farm occupational safety and health procedures. | **Y** |  | Compliant |
| **10.15** | **Visitors** |  |  |  |
| 10.15.1A | All visits by non-company personnel shall be recorded in a visitor’s book or similar register. | **Y** |  | Gate pass issued to all visitors / Contractors. |
| 10.15.2C | Visitors may be accompanied by a company representative as necessary. | **Y** |  | Visual observation, records available |
| 10.15.3A | Visitors shall be provided with suitable protective clothing or equipment when entering areas where they might be exposed to hazardous or injurious conditions. | **Y** |  | Visual observation |
| **10.16** | **Records** |  |  |  |
| 10.6.1 | Records and documentation to be kept in addition to those required by the laws shall include:  a) A record of work contracts for permanent and seasonal workers;  b) A record of all the daily rolls for all casual workers;  c) A record of all the monetary receipts in accordance with the pay roll and any receipts of payment of any kind. | **Y** |  | Compliant |

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| **11.0** | **ENVIRONMENTAL MANAGEMENT** |  |  |  |
|  | The operator has an environmental management plan to cover all aspects both positive and negative of agricultural and social activities as required by the Environmental Management and Coordination Act, 1999 | **Y** |  | Ok |
| **11.1** | **Environmental impact assessment** |  |  |  |
| 11.1.1A | The operator has carried out Environmental impact assessment and license which determines the impact of the intended farming activity on the environment. | **Y** |  | EIA |
| 11.1.2B | The operator has demonstrated competence in regards to minimizing the potential impacts such as nutrient loss from farming activities on the environment. | **Y** |  | Compliance Officer in charge - Bilha- Degree in Environmental Science – 2015, 6 years’ experience |
| 11.1.3A | There are visible and documented initiatives to support environmental schemes. | **Y** |  | Cover crops, channeling of water to control soil erosion, waste segregation and disposal, Noise regulations |
| 11.1.4A | The operator has safeguards for soil, water and air and ensure general conservation of the environment. | **Y** |  | Visual observation |
| 11.1.5A | There is a system for monitoring and evaluation of water use, pesticides, fertilizers and energy. | **Y** |  | Monitoring done daily; evaluation of data was ongoing to forma trend analysis. |
| **11.2** | **Pesticides use and disposal** |  |  |  |
| 11.2.1A | There are sufficient environmental protection procedures in place to demonstrate that there are no pesticides disposed into the environment. | **Y** |  | Records available |
| **11.3** | **Packaging resource minimization** |  |  |  |
| 11.3.1A | All materials used for product packaging and shipping are clearly described in the Environmental Management Plan | **Y** |  | Records available |
| 11.3.2A | There are records of materials used in product packaging and shipping, including the type and quantities of materials used. | **Y** |  | Records available |
| 11.3.3C | Operator has developed a plan of action to minimize packaging and packaging-related waste, with auditable timelines and performance benchmarks. | **Y** |  | Records available |
| **11.4** | **Energy resource use and management** |  |  |  |
| 11.4.1A | The operator has 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. | **Y** |  | Energy management policy available |
| 11.4.2A | The operator has provided in the Environment management plan, a summary of electricity and fuel consumption activities associated with its agricultural production processes. | **Y** |  | Energy Audit report available. |
| 11.4.3A | The operator has provided a description of all on-site electricity or fuel generation activities, and described conservation measures and methods employed to optimize efficiency. | **Y** |  | Records available |
| 11.4.4A | There are records of fuel and electricity used in agricultural production processes, storage operations and administrative support facilities, including electricity and fuel used in applications such as: water pumping, greenhouse lighting, climate control, cold storage facilities, farm equipment operation and packing operations. | **Y** |  | Records available |
| 11.4.5C | The operator has calculated the indirect energy used to produce any synthetic fertilizers used in production. | **Y** |  | Records available |
| 11.4.6A | The operator has a complete analysis of his fuel and electricity usage, and has developed a plan for increasing energy efficiency, with timelines and performance milestones. | **Y** |  | Records available |
| 11.4.7A | The operator has determined and documented the energy demand by the enterprise by 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 are maintained on all aspects of energy management. | **Y** |  | Records available |
| **11.5** | **Integrated waste and pollution management, recycling and re-use** |  |  |  |
| 11.5.1A | The operator has implemented improved methods of waste management. | **Y** |  | Records available |
| 11.5.2A | There is a documented plan to minimize waste, reduce pollution and recycle wastes. The plan has been implemented and confirmed by visible actions and measures. | **Y** |  | Records available |
| 11.5.3A | There are written procedures to minimize wastage and for safe, hygienic disposal of rejected produce and rubbish. Organic materials from cut flower which have been treated with pesticides are not fed to animals. | **Y** |  | Records available |
| 11.5.4A | Wastewater treatment and disposal systems such as constructed wetlands, biobeds, etc are environmentally friendly, subjected to EIA and regular analysis done as per NEMA regulations. | **Y** |  | **Effluent water analysis report available.** |
|  |  |  |  |  |
| 11.5.5A | All possible waste products produced by the farm processes are identified and documented. | **Y** |  | Records available |
| 11.5.6A | There are written procedures for minimizing and disposing non hazardous waste which is communicated to all concerned persons and relevant authorities. | **Y** |  | Records available |
| 11.5.7A | The farm or premises are clear of litter and adequate provisions for waste disposal. |  |  | Visual observation |
| 11.5.8A | Burning of waste is done in a controlled manner. Burning of hazardous material is carried out in an NEMA approved incinerator and by licensed person. There are designated areas for burning or burial of non-hazardous waste which cannot be recycled or composted. | **Y** |  | Visual observation Records available |
| 11.5.9A | Only approved non-ozone depleting refrigerants are used. The operator has carried out reforestation activities with native species on the margin of natural water sources/or in protective forest reserve area defined by NEMA | **Y** |  | R22 Gas replaced by R404A and 507.  Trees planted approx. 100 in 2024 |
| 11.5.10A | All waste generated as source of pollution at each stage of production process is identified and documented. | **Y** |  | Records available |
| 11.5.11A | There is a documented management plan for reducing generation of wastes and pollution. Personnel handling waste materials are adequately trained | **Y** |  | Records available |
| 11.5.12A | Risk assessment for storage, transport and disposal is carried out periodically. | **Y** |  | Records available |
| 11.5.13A | Wastewater disposal systems such as soak-wastewater treatment facilities or constructed wetlands are environmentally acceptable.. | **Y** |  | Records available |
| 11.5.14A | There exists a system for treatment of domestic sewerage water, and storage of pesticide wastes and other hazardous wastes. | **Y** |  | Biodiversity |
| 11.5.15 | Old sump soil is not allowed to contaminate the environment. It is disposed off in a safe manner. | **Y** |  | Compliant |
| 11.5.16A | Waste material such as plastic sheet, cardboard, wood, etc is recycled | **Y** |  |  |
| 11.5.17A | Only packaging material which can be reused or recycled in the importing country is used. | **Y** |  | Cartons – EU Directive |
| 11.5.18A | Effort is made to reduce the use of natural materials other than those that has not been grown specifically for commercial use (timber, etc) | **Y** |  | Visual observation |
| **11.6** | **Water sources** |  |  |  |
| 11.6.1A | Disposal of hazardous chemicals, empty containers or other waste material is not done within 500m of open water sources, 250m of a borehole or on riparian land. | **Y** |  | Collected for organized disposal |
| 11.6.2A | There is no waste water treatment facility latrine, flash toilets or septic tanks within 500m of an open water source, 250m of a borehole or on riparian land. | **Y** |  | Visual observation |
| 11.6.3A | Riparian land is conserved according to the relevant National Environmental Regulations. | **Y** |  | Visual observation |
| 11.6.4A | Rivers are not dammed or diverted without permission from the ministry responsible for water resources.. | **Y** |  | Visual observation |
| **11.7** | **Wastewater treatment** |  |  |  |
|  | The operator ensures that waste water from production and domestic sources is treated separately. | **Y** |  | Records available |
| **11.8** | **Bio-diversity and ecological conservation (applicable to growers, propagators and breeders)** |  |  |  |
| 11.8.1A | There exists a conservation policy or statement which complies with the local legislation governing wildlife and conservation issues. | **Y** |  | Records available |
| 11.8.2A | All non-cropped areas are managed so as to encourage wildlife. Tree planting areas are defined so that unnecessary disturbance is avoided . | **Y** |  | Annual tree planting |
| 11.8.3A | the operator acknowledges and respects designated environmental sites, Natural game corridors are maintained to allow wild animal’s access to water and to other land. | **Y** |  | Records available |
| 11.8.4A | The operator implements a permanent programme aimed at improving landscape and biodiversity within the farm and its perimeter. | **Y** |  | Records available |
| 11.8.5A | The operator does 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. | **Y** |  | Visual observation |
| 11.8.6A | The Operator has trained workers in the implementation of the Environmental management plan and records kept | **Y** |  | Records available |
| **11.9** | **Soil conservation-(applicable to growers, propagators and breeders)** |  |  |  |
| 11.9.1A | A good agricultural practice (GAP) policy is maintained covering all aspects. | **Y** |  | Available in notice board. |
| 11.9.2A | Where applicable riparian land boundaries are established |  | **N/A** | No riparian land |
| 11.9.3A | There is use of organic manure and composted waste to encourage maintenance of soil fertility. | **Y** |  | Analysed before use. |
| **12.0** | **LEGAL AND CONTRACTUAL OBLIGATIONS** |  |  |  |
| **12.1** | **Legal compliance** |  |  |  |
|  | The operator complies 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 legal requirements and all applicable licenses, permits and other legal requirements are valid. 3. There exist a mechanism for ensuring that all identified laws and regulations are implemented. 4. There exist an appropriately scaled system for tracking any changes in the law. | **Y** |  | NEMA Effluent, Audiometry last done in 06.07.2023 |
| **12.2** | **Intellectual Property (IP) rights and royalties** |  |  |  |
| 12.2.1A | the operator complies with the IP rights related to the protected plant material. |  |  |  |
| 12.2.2B | Employees are continuously trained and informed of IP rights, applicable legislation and this code of conduct. | **Y** |  | UPOV Guidelines communicated to key staff. |
| 12.2.3B | Breeders contracts including but not limited to royalties are within internationally acceptable guidelines and as negotiated with the parties. | **Y** |  | Breeders- Interplant, Duhmen Orange, De Reuters. |
| 12.2.4C | In case of any unresolved disagreements between the parties, arbitration is done through applicable laid down regulations and procedures. | **Y** |  | In the contract. |
| **12.3A** | **Registration and certification of nurseries** |  |  |  |
|  | the operator is registered by the relevant regulatory agency following compliance and inspection. There exist documentation that the nursery is regularly audited by the relevant regulatory agencies. |  | **N/A** | No nurseries on site |
| **12.4** | **Ownership and transfer (applicable to growers, propagators and breeders)** |  |  |  |
| 12.4.1 | Advertisement for a variety for sale specifies the license number allocated to the license holder by the regulatory agency. |  | **N/A** | Not done on site |
| 12.4.2 | There exist a quality management system to assure that the plants offered for sales are of quality, health and free from pests and diseases and transfer document issued by an authorised person. |  | **N/A** | No nurseries on site |
| 12.4.3 | The authorized person must be competent and qualified to carry out quality assurance and inspection |  | **N/A** | No nurseries on site |
| 12.4.4 | All plants sold are accompanied by written notice to the receiver covering of the following   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. |  | **N/A** | No nurseries on site |
| 12.4.5 | The operatorprovides their guarantee policies to prospective buyers that includes 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). The buyer-seller contracts provide for compensation terms and conditions on pest and disease/plant health problems traceable to the breeder materials. |  | **N/A** | No nurseries on site |