KS 1758 Non-Conformity report

Date of audit: 15 Sept 2022

Site audited: SOTIK TEA

Name of Auditor: JANE MUSINDI

Type of audit: GAP ASSESSMENT

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| **Clause Number** | **Requirement** | **Root cause** | **Action required** | **Action completed** |
| **5.3.1A** | The operator has in place a detailed and precise process flow that ensures that every unit or batch of produce received is clearly marked to enable it to be clearly traced from receipt through the handling process to dispatch point. | Staff had not had any training on process flow development | Awareness training to be conducted, process flow diagram to be developed | Awareness training done and process flow diagram developed |
| **6.1A (c)** | Records and documentation to be kept by the operator in addition to those required by the laws of the land shall include:  c) a list of personnel who have access to pesticide stores, those responsible for transport, mixing and handling of pesticides and records of their relevant trainings;  p) a record of disposal of dilute pesticides, pesticide containers etc and a simple map of the entire disposal sites whether in use or not; | Staff not trained on requirements of the KS 1758 standard | Awareness training to be conducted.  Operator to provide missing information | Awareness training done  Operators provided records of pesticides and maps |
| **6.2A** | Operators ensures that employees charged with record keeping are trained to do so accurately and that they are adequately supervised | Staff not aware on the requirements of the KS 1758 Standard | Awareness training to be conducted  Operator to provide training record | Awareness training done  Operators provided records |
| **9.1.1C** | The 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. | Staff not aware of the requirements of the KS 1758 standard | Awareness training to be conducted  Operator to prepare a soil map | Awareness training done  Operators provided records and maps |
| **9.2.1A** | A Good agricultural practice (GAP) policy covering all aspects is maintained. | Staff not aware of the requirements of the KS 1758 standard | Awareness training to be conducted  Operator to prepare a Good Agricultural Practice (GAP) policy | Awareness training done  Operators provided policy records |
| **10.1.4B** | The person in charge of fertilizer application and the operators demonstrates understanding on matters relating to fertilizers and fertilizer use. | Staff not aware of the requirements of the KS 1758 standard | Awareness training to be conducted  Operator to provide evidence of competence | Awareness training done  Operators provided records competence |
| **10.1.5A** | Trained and competent employees are responsible for fertilization programme. | Staff not aware of the requirements of the KS 1758 standard | Awareness training to be conducted  Operator to provide evidence of competence | Awareness training done  Operators provided records competence |
| **10.1.6A** | There is proof of that competence and where it is lacking, training is given by qualified personnel. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Operator to provide evidence of competence | Awareness training done  Operators provided records competence |
| **10.4.1C** | A cropping care plan is developed to ensure minimum nutrient loss. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Operator to provide a cropping care plan | Awareness training done  Operators provided records cropping plan |
| **10.4.2C** | The grower, based on the risk assessments and soil analyses, makes a cropping plan and fertilization program that aims at minimizing nutrient loss. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Operator to provide a cropping care plan | Awareness training done  Operators provided cropping care plan |
| **10.6.6A** | 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 signs are prominently displayed both inside and outside at the entrance to the store. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Warning signs should be provided at the fertigation unit | Awareness training done  Warning signs provided at the fertigation site |
| **10.7.1C** | 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. This is in a designated area away from water sources. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Operator needs to incorporate use of organic manure in the program | Awareness training done  Use of organic manure has been incorporated in the program |
| **11.3.10.** | 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. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Operator to provide training records | Awareness training done  Operators provided records of competence |
| **12.2.5A** | The implementation of the Integrated Pest Management on a preventative basis, where technically feasible and economically viable, is supervised by a technically competent person. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Operator to provide evidence of competence | Awareness training done  Operators provided training records |
| **12.3.4.2A** | A register of the types and characteristics of all pesticides used on the farm is maintained. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Operator to provide a comprehensive list of chemicals | Awareness training done  Operators provided comprehensive list of chemicals |
| **12.3.5.1A** | Written procedure for transport of pesticides is developed and communicated to all involved in the transport whether on the farm or on transit. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Operator to provide written procedure for transportation of pesticides | Awareness training done  Operators provided written procedure for transportation of chemicals |
| **12.3.5.2A** | Drivers and turn-boys are trained in emergency procedures in the event of accident, fire, spillage and direct contact with persons. Proof of training by a recognized organization is required. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Operator to provide training record | Awareness training done  Operators provided training records |
| **12.3.5.4A** | Vehicles used to transport pesticides are furnished with suitable equipment and materials such as protective clothing, fire extinguisher, sand, shovel, among others, to deal with emergencies. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be carried out  Emergency equipment to be provided for | Awareness training done  Operators provided emergency equipment |
| **12.3.8.1A** | There is a separate area for dispensing of pesticides and hazardous chemicals fitted with:   1. workbench; 2. Running water supply is within at least 5 meters from the dispensing areas; 3. wash basin plus eyebath; 4. accurate measuring equipment; 5. suitable containers for pre-mixing of pesticides/chemicals; 6. Clear marking on all equipment indicating they are for use with pesticides/chemicals only. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  The finding was that pre-mixed concentrate is ferried to a mixing area, then re-diluted to the required rate at the mixing area.  It was suggested that this could create loopholes for misuse of the chemical. This needs improvement.  There is also need to differentiate equipment used for chemicals | Awareness training done  Operators enhanced the procedure for mixing of chemicals  Equipment used for transporting chemicals have been labeled to differentiate containers |
| **12.3.11.3A** | Regular audits and training are conducted to check consistency in the process and underpin the practice. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Internal self-assessment to be carried out.  Audit and training schedule to include KS 1758 | Awareness training done  Internal self-assessment done |
| **12.3.12A** | 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. Application equipment is dedicated to intended use for the purpose of controlling pesticide cross contamination | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to demonstrate differentiation of equipment used for chemicals | Awareness training done  Equipment used to transport chemicals have been labelled to differentiate types of chemicals used. |
| **13.0** | Workers are trained and supervised closely to ensure that the produce is harvested in the right way and at the correct maturity. Training and supervision procedures are documented. Smoking, eating, chewing and drinking is permitted in designated areas away from immediate vicinity of harvesting, grading, packing, or storage operations. Signs are displayed to this effect. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Documented training and supervision procedures should be provided | Awareness training done  Operators provided records competence |
| **13.1.3A** | The containers, harvesting tools and other harvesting equipments that are continuously used are appropriately cleaned, disinfected and maintained in tandem with the risk assessments. Produce handling containers are strictly for the produce and not any other use e.g. chemicals, plant debris, etc. Colour codes, symbols or any other means may be used to distinguish containers for various uses. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Colour coding/ symbols etc differentiating equipment was not evident | Awareness training done  Colour coding/ symbols etc differentiating equipment was done |
| **13.1.4A** | A planned washing program ensures that ,harvesting containers such as plastic field buckets or crates that can be easily cleaned are used and are free from contamination | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide a washing program | Colour coding/ symbols etc differentiating equipment was |
| **13.3.2A** | 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 | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Packhouse requires registration by the competent authority (HCD) | Awareness training done  Pack house has been registered by HCD |
| **13.5.2A** | 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. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Pack house surfaces are made from wood | Awareness training done  Packhouse surface lined with a water proof material |
| **13.5.7A** | Lighting over inspection, grading and cold store areas is adequate to allow effective inspection of produce. All fixtures are protected to prevent the risk of broken glass contaminating the produce. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Packhouse uses natural light, there is need to have alternatives for when this is not adequate | Awareness training done  Pack house has been provided with an alternative source of light. |
| **13.8** | **Risk assessment in the pack house process** |  |  |  |
|  | A risk assessment or audit is done along the produce process flow and its associated systems. This assessment considers not only areas where food safety hazards may occur but 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. These assessments are documented and periodically reviewed. The operator has in place a detailed and precise process flow that ensures that every unit or batch of the produce received is clearly marked in a manner that enables the produce to be easily traced from receipt through handling process to dispatch point. Such a system is monitored and reviewed periodically for effectiveness. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to conduct and document a HACCP study | Awareness training done  Operators provided HACCP records |
| **13.8.1A** | The produce is received by trained and competent personnel capable of carrying out independent inspection of it and deciding on whether to accept or reject (with a reason), or, accept with a provision for further sorting. The condition of produce at the time of receipt and delivery is documented to indicate unconditional acceptance, further sorting or rejection. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide for inspection at critical points | Awareness training done  Operators provided inspection records |
| **13.9.1A** | 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; 4. Loading area. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to develop and document inspection procedures for the product reception, during processing, final checks and at the loading area | Awareness training done  Operators provided inspection procedures |
| **13.10.1A** | The operator has a quality assurance system. Quality control unit is within the vicinity of the pack house and is equipped with quality control facilities, equipment, procedures, standards and records as required. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  The operator needs to prepare a quality assurance system | Awareness training done  Operators provided records on quality assurance systems |
| **13.12.2A** | Routine and general cleaning procedures for the facilities and equipment are documented, monitored and evaluated for effectiveness. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide for cleaning procedure | Awareness training done  Operators provided cleaning procedure |
| **13.12.6A** | Work table tops, knives and cutting boards are of stainless metal and plastic construction only. These are maintained in sound condition and kept clean at all times. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to ensure that no product contact surfaces are made from wood | Awareness training done  Surfaces with wood have been lined with water proof material |
| **14.2.4A** | There are clearly marked emergency exits, which are fitted with fire safety break locks or remain unlocked during working hours. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Emergency exits to be clearly marked | Awareness training done  Emergency exits have been labelled |
| **14.2.5A** | Relevant safety rules and precautionary safety measures are clearly displayed. The emergency plan and accident procedures is availed to all employees and displayed in common notice-boards. Sign-posts for risk prone areas are displayed appropriately. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  The operator to develop a comprehensive emergency plan, there’s only fire risk provided for | Awareness training done  Operators provided emergency plans |
| **16.3.1A** | The Operator has provided a description of all materials used for product packaging and shipping in the Environment management plan. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to prepare an environmental management plan that includes description of all product packaging and shipping | Awareness training done  Operators provided environmental management plans |
| **16.3.2A** | The Operator has provided auditable records of materials used in product packaging and shipping, including the type and quantities of materials used. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to prepare an environmental management plan that includes description of all product packaging and shipping | Awareness training done  Operators provided environmental management plans that includes description of all product packaging and shipping |
| **16.3.3C** | The Operator has assessed the potential for:   1. reducing the volume of packaging per unit of product delivered; 2. increasing the use of certified recycled or compostable materials; 3. obtaining materials from certified sustainable sources; or 4. Reusing packaging materials. Based on this assessment, the Operator shall develop a plan of action to minimize packaging and packaging-related waste, with auditable timelines and performance benchmarks. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide evidence of assessment | Awareness training done  Operator conducted assessment |
| **16.4.1A** | The Operator has a 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. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide written policy and procedures, and evidence of practice | Awareness training done  Operator provided policy and demonstrated practice |
| **16.4.2.A** | The Operator has provided in the Environment management plan a summary of electricity and fuel consumption activities associated with its agricultural production processes. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide summary of electricity and fuel consumption activities in the environmental management plan | Awareness training done  Operator provided energy sources and use records |
| **16.4.5A.** | The Operator has analysed his fuel and electricity usage, and developed a plan for increasing energy efficiency, with timelines and performance milestones. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide evidence of analysis | Awareness training done  Operator provided analysis records |
| **16.4.6A** | The Operator has determined and documented the energy demand by the enterprise for developing an energy efficiency plan with goals and implementation activities towards increased efficiency, reduced dependency on non-renewable sources and increased use of renewable energy. Records are maintained on all aspects of energy management | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide evidence | Awareness training done  Operator provided energy efficiency plan with goals and implementation activities |
| **16.5.1A** | All possible waste products produced by the farm processes are identified and documented. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide list of all waste generated | Awareness training done  Operator provided list of waste generated |
| **16.5.2A.** | There are written procedures to minimize wastage and for the safe, hygienic disposal of rejected produce and rubbish. Organic material from produce whose pre-harvest interval have not been observed are not fed to animals. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide written procedures to minimize waste | Awareness training done  Operator waste management records |
| **16.5.3A** | There is a documented plan to minimize waste, reduce pollution and recycle wastes. The plan is implemented and confirmed by visible actions and measures. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide documented plan to minimize waste | Awareness training done  Operator provided records to minimize waste |
| **16.5.5A** | Written procedures for minimizing and disposal of non-hazardous waste are developed and communicated to all concerned persons and relevant authorities. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide evidence of training | Awareness training done  Operator provided training records |
| **16.5.9A** | Documented Identification of all waste generated as well as source of pollution at each stage of production process is provided. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide written documentation | Awareness training done  Operator provided analysis records |
| **16.5.10A** | Documented management plan for reducing generation of wastes and pollutions sources and training in waste management for personnel for adequate handling of waste materials is available. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide documented management plan | Awareness training done  Operator provided management plan |
| **16.5.11A** | Risk assessment for storage, transport and disposal of wastes is carried out periodically. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to carry out risk assessment | Awareness training done  Operator provided risk assessment |
| **16.8.1A** | There is a documented conservation policy or statement which complies with the local legislation governing wildlife and conservation issues. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to document required policy | Awareness training done  Operator provided policy on wildlife conservation |
| **16.8.6A** | The Producer has trained workers in the implementation of the Environmental management Plan’s stated ecological procedures and practices, and maintained records of such training. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to provide evidence of training | Awareness training done  Operator provided training records |
| **17.1A** | There are written procedures for the safe, hygienic disposal of rejected produce and rubbish. Organic waste materials from crops which have been treated with pesticides can be fed to animals if GAP has maintained and preharvest intervals complied with. | Staff not aware of the requirements of the KS 1758 Standard | Awareness training to be conducted.  Operator to develop procedures required | Awareness training done  Operator provided procedures for safe, hygienic and disposal of waste |