

MS comments Template

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| <b>QF003</b><br><b>Reference #:</b><br>CQ/2026/0242-2 | <b>Document:</b> DCRCP 13: 202x –<br>Coconut – Good Agricultural Practices |
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| MB <sup>1</sup> | Clause No./<br>Subclause<br>No./<br>Annex /<br>Figure /<br>Table | Line<br>Number | Type<br>of<br>com-<br>ment <sup>2</sup> | Comment (justification for change) by the MB                                                                                                                                                                                                                                                                     | Proposed change by the MB                                                                                                                                                                                                                                  | Consultant Feedback                         | RTC observations<br>on each comment submitted            |
| DM              | Cover pages<br>and footer                                        |                | ed                                      | The draft retains unresolved identifiers and inconsistent publication data, including 202X/202x, placeholder ISBN and ICS numbers, DCRCP/CDCRCP references, and CROSQ 2025/2026 copyright years.                                                                                                                 | Complete and standardise the document designation, year, ISBN, ICS code, copyright year and footer references before publication.                                                                                                                          | Noted. Assets will be added at publication. | Accepted<br><br>These will be included before publishing |
| GD              | Committee Representati<br>on                                     | 17             | ed                                      | Error in spelling of Committee Member Name for Grenada.                                                                                                                                                                                                                                                          | Change from McSwen to Mc Ewen                                                                                                                                                                                                                              | Accepted.                                   | Accepted                                                 |
| DM              | Foreword                                                         |                | ed                                      | The foreword calls this 'CRS 88: 202x', although the draft is designated CDCRCP 13:202X. This is a material identification error.                                                                                                                                                                                | Replace 'CRS 88: 202x' with the approved designation 'CDCRCP 13:202X' throughout the foreword.                                                                                                                                                             | Accepted.                                   | Accepted                                                 |
| TT              | Foreword                                                         | N/A            | ed                                      | The Foreword refers to "CRS 88:202X, Coconut - Agricultural Practices (GAP)"; however, the document being reviewed is CDCRCP 13:202X. CRS/DCRS 88 appears to relate to the separate Voluntary Sustainability Standard also submitted for review.                                                                 | Correct the reference to CDCRCP 13:202X - Coconut - Good Agricultural Practices (GAP), and ensure the numbering is consistent throughout the document.                                                                                                     | Accepted.                                   | Accepted                                                 |
| TT              | Foreword                                                         | N/A            | te                                      | The Foreword states that the Code establishes the foundation for GAP certification. However, the document is presented as a Code of Practice and mainly uses recommended language. This may create uncertainty as to whether the document is itself a certifiable standard or guidance for future certification. | Clarify that this Code of Practice provides technical guidance and may serve as the foundation upon which national or regional GAP certification schemes, audit checklists, producer readiness tools or conformity assessment programmes may be developed. | Accepted.                                   | Accepted<br><br>See updated paragraph                    |

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| TT              | Foreword /<br>General                                            | N/A            | te                                      | The Code is intended for CARICOM-wide application. Implementation capacity may vary among Member States in relation to laboratory testing, certified planting material, extension services, crop suitability mapping, environmental assessment processes and conformity assessment infrastructure. | Include a note that Member States may develop nationally appropriate implementation tools, phased compliance pathways, simplified farmer templates and checklists while maintaining the core principles of food safety, traceability, environmental protection and worker safety. | Statement not needed in foreword. Adaptation and modification of CRS is a decision of the member states | Not Accepted<br><br>Statement not needed in foreword. Adaptation and modification of CRS is a decision of the member states |
| DM              | Contents                                                         |                | ed                                      | The contents omits clause 3.11, does not list Annex D although it is cited in the text, and shows 'Error! Bookmark not defined.' for Annexes E, F and G.                                                                                                                                           | Rebuild the table of contents after final editing so that all clauses and Annexes A-I appear with correct titles and page numbers.                                                                                                                                                | Accepted.<br>Document automatic citations and table of contents to be updated                           | Accepted<br><br>Adjusted during formatting                                                                                  |
| TT              | Contents                                                         | N/A            | ed                                      | The contents page contains formatting and numbering issues, including "Error! Bookmark not defined" for Annexes E, F and G. The contents also jumps from 3.10 to 3.12, although Clause 3.11 appears in the body.                                                                                   | Correct all numbering, cross-references, bookmarks and contents page formatting before publication.                                                                                                                                                                               | Accepted.<br>Document automatic citations and table of contents to be updated                           | Accepted<br><br>Adjusted during formatting                                                                                  |

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| DM              | 1                                                                | Scope          | te                                      | The scope combines industrial use, human consumption and primary processing without defining the boundary between farm GAP and processing GMP. It also refers to food authenticity and fraud without stating the applicable controls or records. | Clarify the covered activities and exclusions, cross-reference processing requirements where applicable, and state the intended scope of food-authenticity and fraud controls. | Accepted: Scope expanded for clarity.<br><br><i>“This Code of Good Agricultural Practice specifies requirements and recommendations for the hygienic production, harvesting, post-harvest handling, storage, and transport of coconuts intended for human consumption and industrial processing. It applies to primary production activities, including the sourcing of planting material, farm establishment and management, environmental considerations, harvesting of young and mature coconuts, and on-farm post-harvest operations.</i><br><br><i>This Code also provide requirements for ensuring environmental management, worker health and safety and recommendations that support documentation and records management, product traceability, food authenticity, and the prevention of fraud at the primary production stage.</i><br><br><i>This Code does not cover secondary processing, manufacturing, or packaging operations, which should be addressed through applicable Good Manufacturing Practices (GMP) and relevant processing standards.”</i> | Scope adjusted                                |

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| TT              | Scope                                                            | N/A            | te                                      | <p>Revise the Scope to reflect the full farm-level GAP coverage, including production, harvesting, primary handling, traceability, environmental management, worker health and safety, and relevant post-harvest handling activities.</p> <p>Add the following as the second sentence in the Scope:</p> <p>The standard addresses production, harvesting, primary handling, traceability, environmental management, worker health and safety, and relevant post-harvest handling activities, documentation and records management, as well as food authenticity and food fraud.</p> | Revise the Scope to reflect the full farm-level GAP coverage, including production, harvesting, primary handling, traceability, environmental management, worker health and safety, and relevant post-harvest handling activities. | Accepted and modified as above. | See above                                     |
| TT              | Scope                                                            | N/A            | te                                      | <p>Clarify the point at which this Code ends and other food safety, processing, manufacturing, labelling or product standards become applicable.</p> <p>Add the following as the last sentence in the Scope:<br/>This standard does not address food safety, processing, manufacturing, labelling or product standards.</p>                                                                                                                                                                                                                                                         | Clarify the point at which this Code ends and other food safety, processing, manufacturing, labelling or product standards become applicable.                                                                                      | Accepted and modified as above. | See above                                     |

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| TT              | 2 Terms and<br>definitions                                       | N/A            | te                                      | The term "farmer" is defined broadly to include both farm owners and workers. Later clauses refer to farmers being paid and provided with social benefits, which is more appropriate for workers or employees.                                                                                                            | Add or revise definitions to distinguish between producer/farm operator, farmer, worker/employee and employer, and use these terms consistently throughout the document.                                                                                                                                   | Accepted with modification.<br>The term farmer is adequately defined as used in context of the standard. In Sections that are specific to workers the term "workers" to be used which is part of English vernacular and clearly understood. In 3 clauses which are specific to workers replace the word "farmer" at following locations. 3.11.1, 3.13.2, Annex I (Row with Workers health, safety and welfare) | Consultant feedback accepted                   |
| GD              | 2. Terms and<br>definitions<br>(section<br>2.20)                 | Page 4         | te                                      | Hybridization is not strictly limited to Tall and Dwarf crosses, and the definition is somewhat narrow because not all hybrids are simply defined by their high yield and early bearing characteristics.                                                                                                                  | Plants derived from cross-pollinating two genetically distinct varieties or ecotypes (either naturally or through controlled breeding) to combine traits like high-yielding and early-bearing characteristics.                                                                                             | Accepted with modification<br>"A coconut palm produced by crossing two genetically distinct coconut varieties or ecotypes to combine desirable characteristics and traits"                                                                                                                                                                                                                                     | Consultant feedback accepted                   |
| TT              | 3                                                                | N?A            |                                         | Normative language is applied inconsistently. Clause 3.1.1.3 uses 'shall' for a mandatory compliance action (site not to be used for production where contaminants exceed MRLs), while comparable mandatory food-safety/regulatory actions elsewhere (e.g. 3.5.2.1.2, sourcing only registered fertilisers) use 'should'. | Review the Code against standard drafting conventions (ISO/IEC Directives, Part 2) and apply 'shall' consistently to mandatory/regulatory requirements, reserving 'should' for recommended practices, so that certification bodies and auditors can distinguish audit-critical requirements from guidance. | Accepted.<br>Use of " <u>shall</u> " at clause 3.5.2.1.2.                                                                                                                                                                                                                                                                                                                                                      | Accepted<br><br>Changes to be made accordingly |

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| DM              | 3.1.1                                                            | Site<br>selection<br>and<br>manage<br>ment                | te                                      | The clause applies maximum residue limits (MRLs) to contaminants at a production site. MRLs normally apply to residues in commodities; site suitability requires appropriate soil, water or environmental criteria.               | Replace the MRL reference with applicable contaminant limits or risk criteria for soil, water and the production environment, and require documented assessment and corrective action. | Accepted.                                                                                                                                                                                                                                                                                                                                                                 | Accepted                                      |
| DM              | 3.1.1.3                                                          |                                                           | ed                                      | Missing punctuation                                                                                                                                                                                                               |                                                                                                                                                                                        | Accepted. Clause wording to change and punctuation will be addressed.                                                                                                                                                                                                                                                                                                     | Accepted                                      |
| TT              | 3.1.1.3                                                          | N/A                                                       | te                                      | The clause refers to contaminants in a site exceeding Maximum Residue Limits (MRLs). This is technically problematic because MRLs generally apply to pesticide residues in food commodities rather than soil or production sites. | Suggestion: Replace "maximum residue limits (MRLs)" with "applicable national environmental, soil, water or contaminant limits as determined by the relevant competent authority".     | Accepted ...but should be replaced with “contaminants”, as follows<br><br><i>“If contaminant risks are found in amounts that exceed the those set by the relevant competent authority, then the site shall not be used for production and primary processing until corrective or control measures are carried out as determined by the relevant competent authority.”</i> | Accepted<br><br>See updated clause            |
| DM              | 3.2.1                                                            | Farm<br>planning<br>and<br>productio<br>n site<br>mapping | te                                      | Requiring at least two muster points may be disproportionate for small coconut holdings and is not linked to a risk assessment or emergency plan.                                                                                 | Require muster points appropriate to farm size, hazards, access and the documented emergency plan, rather than prescribing a minimum of two for all farms.                             | Accepted with modification.<br><i>“muster points, appropriate to farm size, identified hazards, emergency access and the documented emergency plan, and;”</i>                                                                                                                                                                                                             | Consultant feedback accepted                  |

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| TT              | 3.2.1                                                            | N/A                                       | te                                      | The production site map requirements are useful, but may be too detailed for very small farms. The requirement for at least two muster points may not be practical or necessary for all farm sizes and layouts. | Allow simplified sketch maps for small farms and make muster points risk-based, depending on farm size, layout, hazards, number of workers and emergency access. | Accepted:<br><br>Muster points as above                                                                                                                                                                                                   | See above                                        |
| DM              | 3.2.2                                                            | Farm planning and production site mapping | ed                                      | The sentence uses both 'should' and 'shall' for the same requirement, creating uncertainty over whether identification of production areas is mandatory.                                                        | Use one normative level: 'Each production area within a site shall be identified by a name or code and shown on the property map.'                               | Accepted with modification.<br>Clause to be rewritten for clarity on requirement and guidelines as suggested:<br><br><i>Each production area shall be indicated on the property map and shall be identified by a unique name or code.</i> | Consultant feedback accepted                     |
| DM              | 3.2.4                                                            |                                           | ed                                      | "... should I..." Remove "I"                                                                                                                                                                                    |                                                                                                                                                                  | Accepted.                                                                                                                                                                                                                                 | Accepted                                         |
| TT              | 3.2.4                                                            | N/A                                       | ed                                      | There is an editorial error: "should I be properly designed".                                                                                                                                                   | Correct to "should be properly designed".                                                                                                                        | Accepted.                                                                                                                                                                                                                                 | Accepted                                         |
| DM              | 3.3.1.1                                                          |                                           | ed                                      | This sentence is missing a verb                                                                                                                                                                                 |                                                                                                                                                                  | The word "should" seems to be missing                                                                                                                                                                                                     | Clause removed<br><br>Planting materials defined |

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| GY              | 3.3.1.2<br>3.3.1.4                                               |                | ge                                      | In Guyana, coconut is cultivated to a diversity of varieties. One area which is specifically unique is a self-sustaining speciality population. Besides, all commercial holdings are of a heterogenous genetic background. This varietal heterogeneity possesses resilience attributes to environmental pressures. Not giving credit to sustainability of cultivating varietal diversity, or tolerance for sustaining varietal diversity makes for an unsustainable future for coconuts in the region; considering historical, emerging and potential pests. 'GAP' documentation MUST give credit and incentivise production systems that sustainably cultivate coconut diversity. |                           | Noted. The GAP makes allowances for suitable varieties to be used once recommended by the competent authority. Diversity in varieties grown is implicit and not limited to what is current or commonly known. | Agree with consultant's feedback              |
| DM              | 3.3.1.3                                                          |                | ed                                      | "...diseases resistance..." Should be singular                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | "...disease resistance.." | Accepted.                                                                                                                                                                                                     | Accepted                                      |

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| DM              | 3.3.2.1                                                          | Sourcing<br>planting<br>materials | te                                      | The provision requires materials from varieties approved by the competent authority 'as indicated in Annex B', but Annex B is a commercial-variety reference and may not be a current approval list for every Member State.                                                                                                                                                                                                                                                                                                                                                                                                      | Require planting material to be sourced from varieties and suppliers currently approved or certified by the competent authority; retain Annex B as informative only. | Accepted.<br><br>To be updated as follows:<br><br><i>“3.3.2. Sourcing of planting materials</i><br><br><i>All planting materials should be:</i><br><i>a) obtained from varieties approved by the relevant competent authority.</i><br><i>Note: Annex B contains information on commercial coconut varieties.</i><br><i>b) sourced from suppliers or production centres, approved or certified by the relevant competent authority.”</i> | Consultant feedback accepted                  |
| GY              | 3.3.2.1 (a)                                                      |                                   | te                                      | Use of “variety” shall comply with Article 1 (vi) of the 1991 Act of the UPOV Convention:<br>"variety" means a plant grouping within a single botanical taxon of the lowest known rank, which grouping,<br>irrespective of whether the conditions for the grant of a breeder's right are fully met, can be - defined by the expression of the characteristics resulting from a given genotype or combination of genotypes, - distinguished from any other plant grouping by the expression of at least one of the said characteristics and - considered as a unit with regard to its suitability for being propagated unchanged. |                                                                                                                                                                      | Noted.. but no suggested change provided.                                                                                                                                                                                                                                                                                                                                                                                               | Noted<br><br>Variety defined                  |

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| GY              | 3.3.2.1                                                          |                | te                                      | Add (c) Access to coconut genetic resources should comply with relevant provisions in Articles 12 and 13 of the International Treaty on Plant Genetic Resources for Food and Agriculture.                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                       | Clarity needed...RTC to decide if the articles cited are critical for sourcing planting materials.<br><br><i>Articles are relevant to access to genetic resources and benefit sharing. Approval by competent authority will cover any known genetic rights or intellectual property under multilateral systems.</i> | Not Accepted<br><br>Planting materials should be sourced through a competent authority |
| GY              | 3.3.2.1 (a)                                                      |                | ge                                      | There are other sources of planting materials. Annex B lists are indicative (rightfully so) and should be considered without prejudice to other varieties not included. For example, Guyana has a 'Bastard coconut' complex, its most important source of coconut planting materials. It is globally unique and demands the legal certainty of 'geographical indicator' protection status. It is geographically confined with a unique environmental signature, self-sustaining, inexorably heterogenous out-crossing population. It is considered to have pest resilience attributes. |                                                                                                                                                                                                                                       | Accepted. See for DM 3.3.2.1 above.                                                                                                                                                                                                                                                                                 | Noted                                                                                  |
| TT              | 3.3.2.1                                                          | N/A            | te                                      | The requirement for planting materials to be sourced from approved or certified suppliers is sound. However, certified nurseries or approved production centres may not be available in all CARICOM Member States.                                                                                                                                                                                                                                                                                                                                                                     | Add "where available" and provide minimum selection and traceability criteria where certified sources are not accessible, including variety identification, pest and disease status, source records and competent authority guidance. | <i>The clause does not limit certified nurseries or approved production to national jurisdictions.</i><br><br><i>Where no sources exist, the competent authority will approve as required.</i>                                                                                                                      | Consultant feedback accepted                                                           |

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| MB <sup>1</sup> | Clause No./<br>Subclause<br>No./<br>Annex /<br>Figure /<br>Table | Line<br>Number                  | Type<br>of<br>com-<br>ment <sup>2</sup> | Comment (justification for change) by the MB                                                                                                                                                                                 | Proposed change by the MB                                                                                                                                                                        | Consultant Feedback                                                                                                                                                                                                                                         | RTC observations<br>on each comment submitted |
| DM              | 3.3.3.1.4                                                        |                                 | ed                                      | “... ensure nut water contact with haustorium..”<br>Missing a verb.                                                                                                                                                          | “...ensure nut water makes<br>contact with the haustorium.”                                                                                                                                      | Accepted with modification.<br><br><i>“Seednuts should be positioned<br/>with the germ end facing upward,<br/>either upright for tall varieties or<br/>tilted for dwarf varieties, to ensure<br/>contact between the nut water<br/>and the haustorium.”</i> | Consultant feedback accepted                  |
| DM              | 3.3.3.3                                                          |                                 | ed                                      | Micro propagated planting materials should be defined<br>in the Definitions section                                                                                                                                          |                                                                                                                                                                                                  | Defined as 2.25.                                                                                                                                                                                                                                            | Accepted                                      |
| TT              | 3.3.3.3.1                                                        | N/A                             | te                                      | Requirements for micropropagated material, including<br>molecular marker verification and full certification, may<br>be difficult to implement in all Member States due to<br>limited laboratory and certification capacity. | Allow alternative evidence of<br>authenticity, plant health and<br>traceability as determined by the<br>relevant competent authority,<br>especially where molecular testing<br>is not available. | Accepted with modification.<br><br><i>“...properly, acclimatised, with<br/>certification and traceability as<br/>determined by the relevant<br/>competent authority.”</i>                                                                                   | Consultant feedback accepted                  |
| DM              | 3.3.3.4.2                                                        | Hybrid<br>planting<br>materials | ed                                      | 'Sevendust' appears to be a typographical error, and<br>the sentence should clearly prohibit seednuts and<br>seedlings derived from F1 hybrid parents rather than<br>leave the source unclear.                               | Replace with: 'Seednuts and<br>seedlings shall not be obtained<br>from F1 hybrid parents; only<br>verified F1 hybrid planting<br>material shall be used.'                                        | Accepted.                                                                                                                                                                                                                                                   | Accepted                                      |
| TT              | 3.3.3.4.2                                                        | N/A                             | ed                                      | The phrase "Sevendust and seedlings should not be<br>obtained from hybrid parents" appears to contain a<br>typographical error.                                                                                              | Replace "Sevendust" with<br>"Seednuts".                                                                                                                                                          | Accepted.                                                                                                                                                                                                                                                   | Accepted.                                     |
| DM              | 3.4                                                              | Farm<br>establish<br>ment       | ed                                      | The text refers to 'requirements for establishing cocoa<br>farms', which is not relevant to a coconut code of<br>practice.                                                                                                   | Replace 'cocoa farms' with<br>'coconut farms' or the applicable<br>national requirements for<br>establishing coconut production<br>sites.                                                        | Accepted.<br>Update 3.4 (e)                                                                                                                                                                                                                                 | Accepted.                                     |

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MS comments Template

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| <b>QF003</b><br><b>Reference #:</b><br>CQ/2026/0242-2 | <b>Document:</b> DCRCP 13: 202x –<br>Coconut – Good Agricultural Practices |
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| JM              | 3.4                                                              |                | ge                                      | Addition (f)                                                                                                                                                                                                                                         | Land should be flat or slightly<br>elevated (preferred)                                                                                                                                            | Accepted                                                                                                                                                                                                                                                                                                                | Accepted                                                                                                                            |
| TT              | 3.4                                                              | N/A            | ed                                      | The clause refers to "requirements for establishing<br>cocoa farms", although the document concerns<br>coconut production.                                                                                                                           | Replace "cocoa farms" with<br>"coconut farms".                                                                                                                                                     | Accepted.                                                                                                                                                                                                                                                                                                               | Accepted.                                                                                                                           |
| DM              | 3.4e                                                             |                | ed                                      | "Comply with country regulations, such as zoning of<br>crops and requirements for establishing cocoa farm"                                                                                                                                           | Should be coconut farms                                                                                                                                                                            | Accepted.                                                                                                                                                                                                                                                                                                               | Accepted.                                                                                                                           |
| DM              | 3.4.2.1                                                          |                | ed                                      | "Prior approval from the relevant competent authority<br>should first..."                                                                                                                                                                            | Remove "first" - prior approval and<br>first are redundant syntax                                                                                                                                  | Accepted.                                                                                                                                                                                                                                                                                                               | Accepted.                                                                                                                           |
| TT              | 3.4.2.2(b)                                                       | N/A            | te                                      | The clause recommends removal of debris without<br>burning to reduce carbon emissions. This is positive,<br>but the Code should also recognise that diseased or<br>infested material may require controlled disposal<br>under plant health guidance. | Revise to state that debris should<br>not be burned except where<br>controlled destruction is required<br>or approved by the competent<br>authority for pest, disease or<br>phytosanitary reasons. | Accepted.                                                                                                                                                                                                                                                                                                               | Accepted.                                                                                                                           |
| DM              | 3.4.3.1.1                                                        |                | ed                                      | Missing punctuation                                                                                                                                                                                                                                  |                                                                                                                                                                                                    | Accepted.<br>Tillage for coconut production should be<br>light or minimal, aimed at breaking up<br>compacted soil and incorporating crop<br>residues and/or organic manure. Such<br>practices enhance soil aeration, improve<br>drainage, suppress weeds, reduce<br>erosion, and maintain or improve soil<br>fertility. | Accepted                                                                                                                            |
| DM              | 3.4.3.2                                                          |                | ed                                      | Suggest testing should be performed by a CAB                                                                                                                                                                                                         |                                                                                                                                                                                                    | RTC to advise                                                                                                                                                                                                                                                                                                           | Not Accepted<br><br>What is CAB?<br><br>Not all member states have a<br>CAB and it depends on the tests<br>being conducted/required |

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| TT              | 3.4.3.2                                                          | N/A            | te                                      | Soil testing at establishment and every two to three years in mature plantations is useful, but testing access and cost may vary across Member States and smallholder systems.             | Retain soil testing as good practice, but allow risk-based or competent authority-guided testing frequency, with simplified nutrient management guidance where laboratory services are limited.                 | Not Accepted.<br>Part of clause provides this. “The farmer should undertake such adjustments that may be necessary based on the results and recommendations of the tests.”                                                                              | Consultant feedback accepted                  |
| JM              | 3.4.3.3.1                                                        |                | ge                                      | Addition (g)                                                                                                                                                                               | Maintain proper grass coverage that is 1 to 3 inches high                                                                                                                                                       | Accepted.                                                                                                                                                                                                                                               | Accepted                                      |
| TT              | 3.4.5.1 /<br>3.3.3.2.2                                           | N/A            | te                                      | There is inconsistency in seedling age. Clause 3.3.3.2.2 gives recommended ages for dwarf, tall and hybrid seedlings, while Clause 3.4.5.1 refers generally to seedlings aged 6-12 months. | Harmonise seedling age recommendations across the document or state that the 6-12 month reference applies only to specified types, with exceptions for tall and hybrid varieties as listed in Clause 3.3.3.2.2. | Not Accepted.<br>Clause 3.3.3.2.2 provides guidance for transplanting. Clause 3.4.5.1 provides guidance for root pruning before transplant. This clause also cross references 3.3.3.2.2 for guidance on transplanting which is done after root pruning. | Consultant feedback accepted                  |
| TT              | 3.4.5.2                                                          | N/A            | ed                                      | The clause refers to planting seedlings in holes or pits as recommended in 3.4.4.2, but Clause 3.4.4.2 deals with planting distance, not pit preparation.                                  | Correct the cross-reference to the clause on holing/pit preparation, i.e. Clause 3.4.3.4.                                                                                                                       | Accepted.                                                                                                                                                                                                                                               | Accepted                                      |

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| TT              | 3.5.2.1                                                          | N/A                  | te                                      | The fertiliser guidance is useful, but fertiliser rates should not appear overly prescriptive unless validated for different CARICOM soil types, rainfall patterns and production systems.                                              | Emphasise that fertiliser application should be based on soil and/or leaf analysis, local agronomic recommendations and competent authority guidance, supported by Annex E as general guidance.                          | Accepted with modification.<br><i>“3.5.2.1.1. To optimise nutrient use the farm should apply the correct amount of fertilisers based on recommendations from soil or leaf tissue analysis, and or agronomic recommendations by relevant competent authority.</i><br><br><i>Note: Annex E provides general information and guidance on recommended fertilization rates.”</i> | Consultant feedback accepted                  |
| DM              | 3.5.3                                                            | Water and irrigation | te                                      | Water is to be assessed and managed, but no minimum monitoring parameters, testing frequency, records or response to non-conforming results are stated. Annex I anticipates records but does not make the verification programme clear. | Require a risk-based water-quality verification programme with defined parameters, frequency, records, corrective action and controls for treated wastewater.                                                            | Accepted....but<br><br>Will the small Caribbean coconut farmers be able to achieve and maintain in the face of challenges like cost, technical capacity, and infrastructure gaps?<br><br>Can this practice be strengthened by adding that should be supported with simplified tools, training, and community-based systems?                                                 | Accepted<br><br>See updated clause 3.5.3.2    |
| TT              | 3.5.3                                                            | N/A                  | te                                      | The Code requires water to be assessed, treated and managed, but does not specify risk levels, testing parameters or frequency for irrigation water, washing water, sap-contact activities and post-harvest handling.                   | Add risk-based water quality guidance, including that water used for washing, sap handling or food-contact activities should be of suitable microbiological and chemical quality and should not introduce contamination. | Accepted.                                                                                                                                                                                                                                                                                                                                                                   | Accepted<br><br>See updated clause 3.5.3.2    |

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| TT              | 3.5.4.3                                                          | N/A            | te                                      | The IPM section is useful and consistent with GAP principles, but implementation would be improved by simple farmer-level monitoring tools and records.                 | Add sample pest monitoring records or refer to simplified templates for pest/disease observations, field location, date, severity, action taken and follow-up.                                                       | ....maintain simplified pest monitoring records or use sample templates to document pest and disease observations to capture, (i) field location, (ii) date of observation (iii)type of pest/disease (iv) severity of infestation (v) action taken (e.g., mechanical, biological, or chemical control) and (vi) follow-up results | Noted<br><br>Information to be considered is outlined in d)<br>Recommend contacting the competent authority (Ministry of Agriculture) to assist in development of sample records. |
| JM              | 3.5.4.3.1                                                        |                | ge                                      | Addition (h)                                                                                                                                                            | Plant different coconut varieties in your orchard to manage pest and disease spread                                                                                                                                  | Accepted.                                                                                                                                                                                                                                                                                                                         | Accepted                                                                                                                                                                          |
| TT              | 3.5.4.3.2                                                        | N/A            | ed                                      | The wording "Effective solutions to suppress weed control" is unclear.                                                                                                  | Suggested Revision to "Effective solutions for weed suppression should include intercropping and mixed cropping systems, where appropriate."                                                                         | Accepted.                                                                                                                                                                                                                                                                                                                         | Accepted                                                                                                                                                                          |
| TT              | 3.5.5.2                                                          | N/A            | te                                      | The requirement to use chemicals registered for coconut is important. However, in some Member States, crop-specific pesticide registrations for coconut may be limited. | State that pesticide use should comply with national pesticide legislation, label instructions and competent authority guidance, including guidance for situations where coconut-specific registrations are limited. | Accepted.                                                                                                                                                                                                                                                                                                                         | Accepted                                                                                                                                                                          |

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| TT | 3.5.6.4 -<br>3.5.6.5  | N/A                                     | te | The clauses address PHIs, spray drift and warning signs, but could be strengthened by including re-entry intervals, buffer zones, weather conditions during application and protection of water sources and sensitive areas. | Add reference to re-entry intervals, buffer zones, wind/rain conditions, protection of neighbouring farms/homes/waterways and environmentally sensitive areas during pesticide application. | Accepted: <u>Appropriate wording of clause needed to incorporate the additional areas proposed</u><br><br>Consider: To ensure the protection of human health, neighbouring communities, and the environment during agricultural chemical use, farmers or applicators shall::<br>(a) follow all PHIs indicated on product labels or national regulations to ensure harvested coconuts are safe for consumption.<br>(b) manage aerial or ground spraying using calibrated equipment, appropriate spray pressure, and drift-reducing nozzles to minimise off-site movement.<br>(c) avoid re-entry of treated coconut fields until the prescribed re-entry period has elapsed.<br>(d) establish protective buffer zones between treated areas and neighbouring farms, homes, schools, waterways, and sensitive habitats.<br>(e) avoid spraying during high winds, imminent rainfall, or when conditions favour drift or runoff.<br>(f) ensure applications do not endanger adjacent farms, households, livestock, or community spaces. Communicate with neighbours before large-scale spraying.<br>(g) prevent contamination of rivers, streams, ponds, wetlands, and ecologically sensitive zones, biodiversity reserves or conservation areas | Accepted<br><br>Adjustments made   |
| DM | 3.5.6.6 to<br>3.5.6.7 | Applicati<br>on of<br>crop<br>protectio | te | Equipment checks and calibration are required only generally or 'as necessary'. Without a documented interval and records, application accuracy and residue-control evidence cannot be verified.                             | Require documented pre-use checks and calibration at defined risk-based intervals, including results, adjustments, responsible person and corrective action.                                | Accepted.....Consider:<br>....Operators shall ensure that all equipment and instruments used in production, processing, or monitoring are subject to documented pre-use checks and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Accepted<br><br>See updated clause |

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|                 |                                                                  | n<br>products  |                                         |                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                      | calibration at defined risk-based intervals.<br>Records shall include:<br><br>(a) results and outcomes of inspections<br>and calibration activities.<br>(b) Adjustments made to restore<br>accuracy.<br>(c) Responsible person conducting the<br>check or calibration.<br>(d) Corrective action taken to address<br>deviations, faults, or non-conformities.<br>(e) Intervals for checks and calibration<br>based on equipment type, usage<br>frequency, and risk to product safety or<br>quality.<br><br>All records must be retained and made<br>available for verification. |                                               |
| DM              | 3.6.1                                                            |                | ed                                      | “...there will be sufficient space...” - presumptive<br>language                                                                                                                                                                   | “...there should be sufficient space<br>for intercrops...”                                                                                                                                                                           | Accepted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Accepted                                      |
| DM              | 3.6.1a                                                           |                | ed                                      | “The choice of intercrops should consider the age of<br>coconut palms, conditions for optimum growth,<br>suitability, availability of market, and other value<br>adding activities”<br>The syntax of this sentence can be improved | The selection of intercrops should<br>take into account the age of the<br>coconut palms, the conditions<br>required for optimum growth,<br>market availability, crop suitability,<br>and opportunities for value-added<br>activities | Accepted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Accepted                                      |

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| TT              | 3.6.1                                                            | N/A                      | te                                      | The statement that there will be sufficient space for intercrops regardless of planting system may not always be correct, especially in dense plantings or mature coconut stands with heavy canopy cover.                          | Revise to state that intercropping suitability depends on planting density, palm age, canopy cover, sunlight, water availability, soil fertility, pest risk and market demand.        | Accepted.           | Accepted.<br><br>Clause adjusted              |
| DM              | 3.7                                                              | Livestock<br>integration | te                                      | Livestock integration is encouraged 'where possible' but the draft does not require a manure, animal-access, water-protection or produce-contamination risk assessment. This can conflict with fresh-coconut food-safety controls. | Make integration conditional on a documented risk assessment and require separation, manure management, water protection, animal-health controls and records appropriate to the farm. | Accepted.           | Accepted.<br><br>Clause adjusted              |

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| TT | 3.7 | N/A | te | Livestock integration can support farm diversification, but the food safety risks are underdeveloped. Animals may contaminate water, harvest areas, storage areas and primary handling zones. | Add guidance on preventing faecal contamination, managing manure, protecting water sources, and excluding livestock from harvest, storage, post-harvest handling and water collection areas. | Accepted with modification.<br><br>Livestock integration shall be conditional on a documented risk assessment that requires separation, manure management, water protection, animal-health controls and records appropriate to the farm.<br><br>CONSIDER:<br>Where livestock are integrated into coconut farming systems, the operator shall establish and maintain measures to prevent contamination of coconuts and coconut-derived products. These measures shall include:<br><br><b>Animal housing and movement:</b><br>Livestock shall be housed or grazed in designated areas that do not overlap with coconut harvesting, drying, or storage zones.<br><br><b>Manure management:</b> Manure shall be collected, stored, and applied in a manner that prevents direct contact with coconuts, coconut water, or processing surfaces.<br><br><b>Water source protection:</b> Shared water sources shall be safeguarded against contamination from animal waste, with separate supply lines for processing and livestock.<br><br><b>Worker hygiene:</b> Workers handling both livestock and coconuts shall follow documented hygiene protocols, including | Accepted.<br><br>Clause adjusted |
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|                 |                                                                  |                |                                         |                                                                                                                                                          |                                                                                                                                                                                                                                         | handwashing and use of protective clothing, before engaging in coconut-related tasks.<br><br><b>Monitoring and corrective action:</b> The farm shall implement routine inspections and corrective measures to ensure livestock activities do not compromise food safety. |                                               |
| TT              | 3.8.2                                                            | N/A            | te                                      | Sap collection presents high food safety risk because sap can ferment rapidly and can be contaminated by tools, vessels, insects and handling practices. | Strengthen requirements for sap collection by including hygienic tapping, food-grade containers, cleaning and sanitising, protection from insects and debris, rapid transport, time-temperature control and prevention of fermentation. | Accepted.                                                                                                                                                                                                                                                                | Accepted<br><br>Clause adjusted               |

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| TT | 3.8.3 / 3.8.4 | N/A | te | Coconut water and young coconut handling require strong hygiene controls because the product may be consumed directly. The Code should better address potable/suitable water, clean cutting tools and prevention of cross-contamination. | Add specific guidance for young coconuts intended for water, including clean harvesting and trimming tools, hygienic surfaces, suitable washing water, protection from soil contact, and clean containers during transport and storage. | <p>Noted. Consider:</p> <p>“For coconuts intended for water consumption, the operator shall implement the following practices to safeguard product quality and food safety:</p> <p>Field sanitation: Orchards shall be maintained in a clean condition; fallen nuts and debris shall be removed promptly to minimize microbial contamination.</p> <p>Clean tools: Machetes, knives, and harvesting equipment shall be cleaned and sterilized at regular intervals.</p> <p>Avoid ground contact: Harvested coconuts shall not be allowed to touch the soil to reduce microbial load.</p> <p>Water source safety: Potable or treated water shall be used for irrigation, washing, and cleaning operations.”</p> <p><u>Or....Reference to code of hygienic practice for coconut water handling and packaging and standard for waternut to be made.</u></p> | <p>Noted</p> <p>Clause adjusted</p> |
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| MB <sup>1</sup> | Clause No./<br>Subclause<br>No./<br>Annex /<br>Figure /<br>Table | Line<br>Number | Type<br>of<br>com-<br>ment <sup>2</sup> | Comment (justification for change) by the MB                                                                                                                          | Proposed change by the MB                                                                                                                                                                                                                                                                                                                                             | Consultant Feedback                                                                                                | RTC observations<br>on each comment submitted                                         |
|                 |                                                                  |                |                                         |                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                    |                                                                                       |
| BB              | 3.8.3.2/3                                                        | 2              | ge                                      | Additional guidance information to assure product quality is maintained.                                                                                              | <ul style="list-style-type: none"><li>Practice good hygiene to ensure personnel are not a source of contamination</li><li>Ensure cutting tools, implements and containers used at harvest are cleaned after each use and are not a source of contamination</li><li>Avoid dragging branches on the ground and have bunches carried to the transport vehicle.</li></ul> | Accepted: After 3.8.2.3, add.....During the harvesting of fresh coconuts, the following practices are recommended: | See above                                                                             |
| JM              | 3.8.3.1 (a)                                                      |                | te                                      | a) coconuts intended for fresh water should be harvested at the tender nut age of 6 – 7 months after flowering, when it is full of liquid endosperm, every 45-60 days | Change 6-7 months to 9 months                                                                                                                                                                                                                                                                                                                                         | RTC/Consultant to revise                                                                                           | Jamaica and St. Lucia to provide reference documents/justification by August 26, 2026 |
| JM              | 3.8.3.1 (b)                                                      |                | te                                      | coconuts for copra production should be harvested when fully mature at 11-12 months old and the harvesting interval should be every 45 days                           | Change 11-12 months to 15 – 16 months                                                                                                                                                                                                                                                                                                                                 | RTC/Consultant to revise                                                                                           | Jamaica and St. Lucia to provide reference documents/justification by August 26, 2026 |

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| JM              | 3.8.3.1 (c)                                                      |                                     | te                                      | for virgin coconut oil, the harvest age should be 10–12 months, when the kernel is thick and oil content is highest, and the copra harvest cycles should be 45–60 days                                                                                             | Change 10-12 months to 15 – 16 months                                                                                                                                                                  |                     | Jamaica and St. Lucia to provide reference documents/justification by August 26, 2026 |
| DM              | 3.8.4.1.1                                                        | Storage<br>of<br>harveste<br>d nuts | te                                      | The clause says harvested nuts should be washed to reduce microbial contamination but does not specify potable/appropriate-quality water, sanitation, drying or prevention of recontamination. It also permits fumigation without explicit authorisation controls. | Specify water-quality and hygienic handling requirements for washing and drying; allow fumigation only with authorised products and methods that comply with national requirements and residue limits. | Accepted.           | Accepted<br><br>Clause adjusted                                                       |

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| BB              | 3.8.4.1.1                                                        |                | ge                                      | Additional guidance information to assure product quality is maintained                                                                | <ul style="list-style-type: none"><li>Nuts are transferred to a clean surface off the ground and allowed to air dry after sanitizing</li><li>Nuts stored indoors off the floor (at least 6”) and away from surrounding walls (at least 18”)</li><li>Nuts stored in a room with adequate ventilation and where contamination and cross-contamination is prevented</li><li>Nuts to be processed after harvesting <u>within 120 hours when not separated</u> from the bunch and <u>up to 72 hours</u> when separated from the bunch.</li></ul> | Accepted.           | Accepted<br><br>Clause adjusted               |
| TT              | 3.8.4.1.1(b)                                                     | N/A            | te                                      | The clause recommends washing harvested nuts to reduce microbial contamination, but does not state the required quality of wash water. | Specify that water used for washing should be of suitable quality for its intended use and should not introduce chemical or microbiological contamination.                                                                                                                                                                                                                                                                                                                                                                                  | Accepted.           | Section adjusted                              |

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| TT              | 3.8.4.1.1(f)                                                     | N/A            | te                                      | The clause allows fumigation or natural repellents for pest protection. These measures can create contamination risk if not controlled.                               | State that pest control measures used in storage must be approved or permitted, applied according to instructions, and managed to prevent contamination of coconuts and storage areas.                            | Accepted.<br>Can be modified as follows:<br><br>(a).harvested nuts should be washed to reduce microbial contamination, using potable water.<br>.... If fumigation of the harvested nut is necessary, use chemical products and methods that comply with national requirements and residue limits. | Section adjusted                              |
| TT              | 3.8.4.1.2                                                        | N/A            | te                                      | Copra drying is included, but the Code does not sufficiently address moisture targets, smoke contamination, mould growth, foreign matter or mycotoxin/aflatoxin risk. | Strengthen copra handling requirements by including hygienic drying surfaces, protection from animals, control of smoke and foreign matter, adequate drying, moisture control, mould prevention and safe storage. | Accepted                                                                                                                                                                                                                                                                                          | Section adjusted                              |

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| BB              | 3.8.4.3                                                          |                | ge                                      | Additional guidance information to assure product quality is maintained                                                                                                          | <ul style="list-style-type: none"><li>Poor quality nuts must be rejected:<ul style="list-style-type: none"><li>Nuts with cracks</li><li>Nuts with any visible sign of pest infestation</li><li>Nuts with contents having a rancid odour</li><li>Nuts with contents that are cloudy</li></ul></li></ul> | These quality requirements could be under (b) | Accept Consultant feedback                                     |
| TT              | 3.9.2                                                            | N/A            | te                                      | Agrochemical storage requirements are important but brief. Additional detail is needed to support safe and auditable implementation.                                             | Add requirements for locked/restricted access, ventilation, original labels, separation of fertilisers and pesticides, spill management, safety data sheets where available, warning signage and separation from produce, water sources and living areas.                                              | Accepted.                                     | Accepted                                                       |
| TT              | 3.10.1                                                           | N/A            | te                                      | The Code recommends biological controls to prevent ecological imbalance. Biological control agents themselves can create ecological risk if not appropriate to local conditions. | Revise to state that biological control agents should only be used where approved or recommended by the competent authority and suitable for the local environment.                                                                                                                                    | Accepted.                                     | Not Accepted<br><br>Proposal is covered in the existing clause |

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MS comments Template

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| <b>QF003</b><br><b>Reference #:</b><br>CQ/2026/0242-2 | <b>Document:</b> DCRCP 13: 202x –<br>Coconut – Good Agricultural Practices |
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| (1)             | (2)                                                              | (3)                                                  | (4)                                     | (5)                                                                                                                                                                                                                                            | (6)                                                                                                                                                                                         | (7)                                                                                    | (8)                                                            |
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| DM              | 3.11                                                             | Health,<br>safety<br>and<br>welfare<br>of<br>workers | ge                                      | The clause calls all persons 'farmers', although the definition includes farm owners and workers. Payment, social benefits and labour-rights obligations need to identify the responsible employer/operator and apply applicable national law. | Use 'employer/operator' and 'worker' consistently, and require compliance with applicable national labour, social-protection, non-discrimination and occupational-safety legislation.       | Accepted.<br>Farmers to be changed to workers.                                         | Accepted<br><br>Term defined and updated throughout            |
| GD              | 3.11                                                             |                                                      | ed                                      | 3.11 is in the body of the document however it is missing from the table of content.                                                                                                                                                           | Needs to be added to the table of Content                                                                                                                                                   | Noted previously on page 2.<br>..... Automatic cross reference updates to be reviewed. | Accepted                                                       |
| TT              | 3.11                                                             | N/A                                                  | te                                      | The section uses "farmers" where "workers" or "employees" may be more appropriate, particularly where payment, social benefits, forced labour and union representation are discussed.                                                          | Revise terminology in Clause 3.11 and align the section with the proposed definitions for worker, employee, farmer, employer and producer/farm operator.                                    | Accepted.<br><br>Farmers to be replaced with workers                                   | Accepted<br><br>Term defined and updated throughout            |
| DM              | 3.11/3.11.1/3.11.2                                               |                                                      |                                         | The use of shall and should within the same clause section                                                                                                                                                                                     | "There shall be no cases..."                                                                                                                                                                | Accepted.                                                                              | Accepted                                                       |
| TT              | 3.12                                                             | N/A                                                  | te                                      | The safety clause is relevant but too brief for practical implementation, especially for pesticide handling, emergency response and farm injuries.                                                                                             | Add requirements or guidance for PPE maintenance, first aid access, emergency contacts, incident records, chemical exposure response, and safe storage and handling of tools and equipment. | Accepted.                                                                              | Not Accepted<br><br>Proposal is covered in the existing clause |
| TT              | 3.13                                                             | N/A                                                  | te                                      | Training is required, but the main clause does not clearly require training records.                                                                                                                                                           | Add that training records should be maintained, including topic, date, trainer/facilitator, participants and evidence of competency where applicable.                                       | Accepted.                                                                              | Accepted<br><br>Clause adjusted                                |

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| TT              | 3.14.3 /<br>3.14.5                                               | N/A            | ed                                      | Clauses 3.14.3 and 3.14.5 appear to repeat the same requirement on disposal of empty pesticide and fertiliser containers and expired chemicals.                                                   | Delete one of the duplicate clauses or consolidate into a single clearer clause.                                                                                                                                   | Accepted.<br>Delete 3.14.5                                                                                                                                                              | Accepted                                      |
| TT              | 3.14.3                                                           | N/A            | te                                      | Disposal of pesticide containers is mentioned, but good practice steps are not sufficiently detailed.                                                                                             | Add guidance on triple-rinsing, puncturing/defacing containers, secure temporary storage, prevention of reuse for food/water, and disposal or return through authorised systems in accordance with national law.   | Not Accepted.<br>Outside of scope of standard.<br>Manner of disposal of pesticide containers should be in accordance with legislation and practices detailed by competent authority.    | Consultant feedback accepted                  |
| TT              | 3.15 / Annex<br>I                                                | N/A            | te                                      | The documentation clause is important and Annex I is normative, but the relationship between recommended practices and minimum certification records is not clear.                                | Clarify which records are minimum requirements for GAP certification or producer readiness, and include recommended record retention periods.                                                                      | For GAP certification in coconuts, the most critical records are those that prove compliance with food safety, traceability, environmental management, and worker welfare requirements. |                                               |
| TT              | 3.16                                                             | N/A            | te                                      | The inclusion of food authenticity and food fraud is progressive, but some actions may be burdensome for small farms, such as annual mitigation plans and consumer education programmes.          | Make food fraud controls risk-based and focus on practical controls such as accurate labelling, approved suppliers, input traceability, variety identification, production records and prevention of false claims. | Reject.<br><br>Food fraud requirements are risk based.                                                                                                                                  |                                               |
| TT              | 3.16(d)                                                          | N/A            | te                                      | The clause refers to regular soil testing and quality control measures to detect contaminants and adulterants. This may be costly and is not clearly linked to food fraud controls at farm level. | Revise to require testing based on risk, regulatory requirements, market requirements, competent authority advice or suspicion of contamination/adulteration.                                                      | Accepted.                                                                                                                                                                               |                                               |

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| TT              | 4                                                                | N/A            | ed                                      | The text reads 'Sevendust and seedlings should not be obtained from hybrid parents' - 'Sevendust' appears to be a typographical error for 'Seednuts'.                                                                                                        | Correct 'Sevendust' to 'Seednuts'.                                                                                                                                                                                                                                                 | Accepted.                                                                                                                                                                                                                                                                                                            | Accepted                                                                                                            |
| TT              | 5                                                                | N/A            | te                                      | The term 'MRLs' (maximum residue limits) is used as a compliance threshold in Clause 3.1.1.3 but is not defined in the Terms and Definitions (Clause 2) or listed in an acronyms section.                                                                    | Add a definition of 'maximum residue limit (MRL)' to Clause 2, consistent with Codex Alimentarius usage.                                                                                                                                                                           | Accepted.....Consider Maximum Residue Limit (MRL) as the highest concentration of pesticide or veterinary drug residue legally permitted in food or animal feed, expressed in milligrams per kilogram (mg/kg). [Codex]<br><br>OR: The term will be removed based on acceptance of another comment. No need to define | Not Accepted<br><br>Term deleted                                                                                    |
| TT              | Annex A, p. 20                                                   | —              | te                                      | The optimum production parameters (rainfall, temperature, soil fertility thresholds, etc.) are sourced entirely from the Philippine base standard, the India Coconut Development Board and FAO, with no CARICOM- or Caribbean-specific agronomic data cited. | Recommend RTC 7 request CARDI and national research divisions (including MALF Research Division) validate Annex A parameters against Caribbean soil and climate data before finalisation, to confirm regional applicability rather than direct transplantation from other regions. | Agreed.                                                                                                                                                                                                                                                                                                              | Not Accepted<br><br>Keep Annex as is making note of citation<br>Reference to other documents for optimum conditions |

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| TT              | Annex A                                                                                | N/A            | te                                      | The optimum conditions are useful, but they should be clearly presented as guidance because CARICOM Member States have varying rainfall, topography, hurricane exposure and dry-season conditions. | Add a note that optimum values are indicative and should be adapted using local agronomic advice, climate resilience measures and competent authority guidance. | Accepted. Annex is informative.                  | See above                                     |
| GD              | Annex A<br>(Optimal<br>conditions<br>for coconut<br>production)<br># 3.<br>Temperature | Page 20        | te                                      | Consider revisiting statement, because a mean monthly temperature of 20 °C is to cold for optimal coconut growth; 20 °C is typically the lowest threshold standard.                                | Consider rewording to a range                                                                                                                                   | Accepted... CARDI's optimum range will be quoted | See updated Annex                             |
| GD              | Annex A<br>(Optimal<br>conditions<br>for coconut<br>production)<br># 4.1<br>moisture   | Page 20        | ge                                      | The missing close bracket is make the statement confusing and a bit scrambled<br>"Field capacity moisture (within temperature range 25-40 °C of available moisture of 12-15 %."                    | Consider rewording: "Field capacity at 12–15% available soil moisture (optimal soil temperature range: 25–40 °C)."                                              | Accepted.                                        | Partially accepted<br><br>See updated Annex   |

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| GD              | Annex A<br>(Optimal<br>conditions<br>for coconut<br>production)<br># 4.3 acidity    | Page 20        | te                                      | Consider revising the range, most sources cite 5.5 to 7.5 as the tolerable range, with many agronomic references pointing to 6.0–7.0 (slightly acidic to neutral) as the sweet spot for best nutrient uptake and growth. | Consider reading the following citation<br>- FAO soil suitability guidelines for coconut (Cocos nucifera)<br>- Ohler, J.G. (1984), Coconut, Tree of Life — a widely cited agronomic reference<br>- Nature-based solutions in agriculture: A review of the coconut (Cocos nucifera L.)-based farming systems in Kerala, "the Land of Coconut Trees," ScienceDirect (2022) | Accepted.           | Accepted                                      |
| GD              | Annex A<br>(Optimal<br>conditions<br>for coconut<br>production)<br># 4.5<br>Texture | Page 20        | ed                                      | Current: "Either sandy, loamy and clayey grades"                                                                                                                                                                         | Change "and" to "or": "Either sandy, loamy, or clayey grades."                                                                                                                                                                                                                                                                                                           | Accepted.           | Partially accepted<br><br>See updated Annex   |
| GD              | Annex A<br>(Optimal<br>conditions<br>for coconut<br>production)<br># 4.5<br>Texture | Page 20        | ed                                      | Current: "...above 4,500 ft-candlelight intensity..."<br><br>Awkawrd phrasing "Provides full and stable bunches of the palm crown, year round."                                                                          | Standard terminology is "foot-candles" or "ft-candles" (omit "light"). Also, consider using lux since the use of foot-candles is outdated.<br><br>"Promotes full and stable bunch development in the palm crown year-round."                                                                                                                                             | Accepted.           | Accepted                                      |

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| MB <sup>1</sup> | Clause No./<br>Subclause<br>No./<br>Annex /<br>Figure /<br>Table                      | Line<br>Number | Type<br>of<br>com-<br>ment <sup>2</sup> | Comment (justification for change) by the MB                                                                                                                                                           | Proposed change by the MB                                                                                                                                      | Consultant Feedback | RTC observations<br>on each comment submitted |
| GD              | Annex A<br>(Optimal<br>conditions<br>for coconut<br>production)<br># 4.6 Fertility    | Page 20        | te                                      | Missing units for K, Ca, Mg                                                                                                                                                                            | meq/100 g soil                                                                                                                                                 | Accepted.           | Accepted                                      |
| GD              | Annex A<br>(Optimal<br>conditions<br>for coconut<br>production)<br># 4.6 Fertility    | Page 20        | ed                                      | For internal consistency change Mn to mg/kg, since all the micronutrients (B, Zn, Cu, Fe) use mg/kg, but Manganese is listed as > 100 ppm.<br><br>Since 1 mg/kg = 1 ppm, standardize Mn to > 100 mg/kg | Mn 100 mg/kg                                                                                                                                                   | Accepted.           | Accepted                                      |
| GD              | Annex A<br>(Optimal<br>conditions<br>for coconut<br>production)<br># 6.<br>Topography | Page 20        | ed                                      | Reword for better clarity (Flat to slightly sloping, rolling to moderately sloping (below 20 %)                                                                                                        | Flat to moderately sloping land (slope <20%)                                                                                                                   | Accepted.           | Accepted                                      |
| JM              | Table B.2 –<br>Hybrids                                                                | 1              | te                                      | Jamaica Tall * Malayan Dwarf (JAM * MD)                                                                                                                                                                | Change to Maypan * Malayan Dwarf (MPan * MD)                                                                                                                   | Accepted.           | Consultant to update                          |
| TT              | Annex B                                                                               | N/A            | ed                                      | The variety table contains typographical errors, including "Firt bearing age".                                                                                                                         | Correct spelling and conduct a full editorial review of the table headings and entries.                                                                        | Accepted.           | Accepted                                      |
| TT              | Annex B                                                                               | N/A            | te                                      | The commercial variety data and recommended product groups are useful, but should be verified for CARICOM conditions and national availability of planting material.                                   | Verify all variety data, product group recommendations and source references with regional coconut experts and competent authorities before final publication. | Accepted.           | Consultant to update                          |

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NOTE Columns 1, 2, 3, 4, 5 are compulsory.

| (1)             | (2)                                                              | (3)            | (4)                                     | (5)                                                                                                                                                                                                                                                                                                                                                                              | (6)                                                                                                                                                        | (7)                 | (8)                                           |
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| MB <sup>1</sup> | Clause No./<br>Subclause<br>No./<br>Annex /<br>Figure /<br>Table | Line<br>Number | Type<br>of<br>com-<br>ment <sup>2</sup> | Comment (justification for change) by the MB                                                                                                                                                                                                                                                                                                                                     | Proposed change by the MB                                                                                                                                  | Consultant Feedback | RTC observations<br>on each comment submitted |
| TT              | Annex C                                                          | N/A            | ed                                      | The Annex appears to contain unpolished source/reference text and formatting issues, including web-source text artefacts.                                                                                                                                                                                                                                                        | Clean up Annex C, remove source artefacts, harmonise seedbed instructions, and ensure the references are properly formatted.                               | Accepted.           | Consultant to update                          |
| GD              | Annex D                                                          |                | ed                                      | Annex D is in the body of the document however it is missing from the table of content.                                                                                                                                                                                                                                                                                          | Needs to be added to the table of Content                                                                                                                  | Accepted.           | Accepted                                      |
| TT              | Annex D                                                          | N/A            | te                                      | Planting density calculations and layout tables should be verified. Rectangular planting guidance should include both between-row and within-row spacing.                                                                                                                                                                                                                        | Recalculate all planting densities and revise tables to include complete spacing information for each planting system.                                     |                     | Consultant to update                          |
| TT              | Annex D,<br>Table D.1, p.<br>24                                  | —              | te                                      | For the square planting system at 9 m × 9 m spacing, the density shown for 1 ha is 134 palms/ha. This is inconsistent with the theoretical density of approximately 123.5 palms/ha (10 000 m <sup>2</sup> ÷ 81 m <sup>2</sup> ) and with the values shown for 2 ha to 5 ha (247, 370, 494 and 617 palms), which correspond to approximately 123 to 124 palms/ha.                 | Replace “134” with “123” or “124”, as appropriate to the rounding method used. Conduct an arithmetic check of all values in Table D.1 before publication.  | Accepted.           | Consultant to update                          |
| TT              | Annex D,<br>Table D.2, p.<br>24                                  | —              | te                                      | The rectangular-system densities of 117, 111 and 105 palms/ha are presented based only on the distance between rows. However, both the between-row and within-row planting distances are required to calculate planting density. Without the within-row spacing, users cannot verify or correctly apply the stated densities.                                                    | State the assumed within-row spacing or add a separate column for it. Verify that each stated planting density is consistent with both spacing dimensions. | Accepted.           | Consultant to update                          |
| GD              | Annex E<br>(Recommen-<br>ded<br>fertilisation<br>rates)          | Page 26        | ed                                      | For clarity, it would be helpful to indicate that the numbers refer to the NPK nutrient analysis by writing "NPK" in brackets before the fertilizer grade. For example, "NPK (21-0-0)" and "NPK (0-0-60)" rather than simply stating "21-0-0" and "0-0-60". This would make the table easier to understand for readers who may not be familiar with fertilizer analysis notation | GD                                                                                                                                                         | Accepted            | Consultant to update                          |

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| DM              | Annexes E<br>and F                                               |                | te                                      | Fertiliser rates and pest-management measures are highly prescriptive yet sourced partly from the Philippines. Some controls, pesticides, species and destruction methods may be unsuitable or unauthorised in particular CARICOM Member States.                                                                                                                                                                                                                                                            | State that Annex E and Annex F recommendations require local validation and competent-authority approval; remove or qualify any pesticide, biological-control, quarantine or destruction measure not approved in the relevant Member State. | Accepted.           | Consultant to update                          |
| GD              | Annex E, F,<br>G                                                 |                | ed                                      | Page numbers are missing from table of Content seems to have an error.                                                                                                                                                                                                                                                                                                                                                                                                                                      | Page numbers needs to be added in table of Content.                                                                                                                                                                                         | Accepted.           | Consultant to update                          |
| TT              | Annex E                                                          | N/A            | te                                      | The fertiliser tables should be technically verified. There appears to be a serious unit inconsistency in the common salt recommendation, where a per-palm value appears inconsistent with the per-100-palms value.                                                                                                                                                                                                                                                                                         | Check and correct all units and rates in Annex E before publication, especially common salt and fertiliser application rates.                                                                                                               | Accepted.           | Consultant to update                          |
| TT              | Annex E,<br>Table E.4, p.<br>26                                  | —              | te                                      | In the table relating to the use of (NH <sub>4</sub> ) <sub>2</sub> SO <sub>4</sub> and NaCl for soils with adequate K, the common-salt rate per palm at 3 years is given as “800 kg”. This is agronomically implausible and inconsistent with the corresponding rate of 80 kg per 100 palms, which equals 0.8 kg or 800 g per palm. It is also inconsistent with the progression of the adjacent rates: 400 g, 600 g, 1.00 kg and 1.20 kg. This error could result in gross over-application in the field. | Replace “800 kg” with “800 g”. Conduct a unit-consistency check of all fertilizer rates in the Annex E tables before publication.                                                                                                           | Accepted.           | Consultant to update                          |
| TT              | Annex F                                                          | N/A            | te                                      | Pest and disease management recommendations, including destruction of infected palms and chemical controls, must align with national plant health, pesticide and environmental regulations.                                                                                                                                                                                                                                                                                                                 | Add a general note that pest/disease management measures should be implemented in accordance with competent authority guidance and national phytosanitary, pesticide and environmental requirements.                                        | Accepted.           | Consultant to update                          |

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| TT              | Annex F                                                          | N/A            | ed                                      | Annex F contains technical and typographical errors that should be checked by plant health specialists.                                                                                                                                                                                                                                                                                                                                                                                                                                           | Conduct a technical and editorial review of pest names, disease names, taxonomy, spelling and recommended controls before finalisation.                                                                                                                                                                                      | Accepted.           | Consultant to update                          |
| TT              | Annex F, pp. 28–29                                               | —              | te                                      | The scientific name for the Asiatic palm weevil is given as “ <i>Rhynchoporus ferrugineus</i> ”; the correct spelling is <i>Rhynchophorus ferrugineus</i> . The insect is also incorrectly assigned to the family Scarabaeidae. <i>Rhynchophorus</i> species belong to the family Curculionidae. Additionally, the coconut scale insect is assigned to “Coccoidae”; however, <i>Aspidiotus</i> species belong to the family Diaspididae. Coccoidea is a superfamily, not a family.                                                                | Replace “ <i>Rhynchoporus ferrugineus</i> ” with “ <i>Rhynchophorus ferrugineus</i> ”; replace “Family Scarabaeidae” with “Family Curculionidae”; and replace “Family Coccoidae” with “Family Diaspididae” for <i>Aspidiotus</i> species. Review all scientific names and taxonomic classifications in Annex F for accuracy. | Accepted.           | Consultant to update                          |
| TT              | Annex F                                                          | —              | te                                      | Annex F includes <i>Rhynchophorus ferrugineus</i> , an Old-World species, but omits <i>Rhynchophorus palmarum</i> (American palm weevil), which is of quarantine and economic significance to CARICOM coconut production. The latter is a vector of the red ring nematode, <i>Bursaphelenchus cocophilus</i> , which causes red ring disease. Its omission limits the regional relevance of the Annex, particularly given the Foreword’s stated intention to adapt the Philippine base standard to reflect pest and disease relevance in CARICOM. | Add a dedicated entry for <i>Rhynchophorus palmarum</i> , including its role as a vector of <i>Bursaphelenchus cocophilus</i> and the associated red ring disease. Review Annex F against a current CARICOM or CARDI regional pest and disease checklist.                                                                    | Accepted.           | Consultant to update                          |

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| TT              | Annex F,<br>p.28-29                                                 |                |                                         | The 'Asiatic palm weevil' entry gives the scientific name as 'Rhynchophorus ferrugineus' (misspelled genus; correct spelling is Rhynchophorus ferrugineus) and lists 'Family Scarabaeidae'. Rhynchophorus spp. are true weevils in family Curculionidae, not Scarabaeidae (scarab beetles). Similarly, the coconut scale insect entry lists 'Family Coccoidae'; Aspidiotus spp. belong to family Diaspididae (armoured scales) - Coccoidea is a superfamily, not a family.                                                                                        | Correct the spelling of Rhynchophorus and the family assignments (Curculionidae for Rhynchophorus spp.; Diaspididae for Aspidiotus spp.).                                                                                                                                                                                                                                       | Accepted.           | Consultant to update                          |
|                 | 10 Annex F<br>(regional<br>relevance)                               |                |                                         | The weevil pest featured in Annex F is Rhynchophorus ferrugineus (Red/Asiatic Palm Weevil, an Old-World species). The pest of greatest quarantine and economic significance to CARICOM coconut production - Rhynchophorus palmarum (American Palm Weevil) and its role as vector of the Red Ring Nematode (Bursaphelenchus cocophilus), causing Red Ring Disease - is entirely absent, despite Red Ring Disease being among the most economically damaging coconut diseases in the wider Caribbean and an active plant quarantine concern in Trinidad and Tobago. | Add a dedicated Annex F entry for Rhynchophorus palmarum / Red Ring Disease (Bursaphelenchus cocophilus) and review the remainder of Annex F against a current CARICOM/CARDI regional pest checklist. This would better fulfil the Foreword's stated intent of adapting the Philippine base standard 'in recognition of ... pest and disease relevance' to the CARICOM context. | Accepted.           | Consultant to update                          |
| GD              | F1<br>(Integrated<br>insect pest<br>managemen<br>t for<br>coconuts) | Page 28        | ge/ te                                  | <p>The table in this section requires expansion. It currently omits the region's most destructive weevil species as well as several other well-documented Caribbean agricultural pests. Further research is recommended to ensure comprehensive coverage.</p> <p>Asiatic Palm Weevil was mentioned and not the South American Palm Weevil (with origins from Tropical South/Central America &amp; Caribbean)</p>                                                                                                                                                  | <p>Add information is needed on the following</p> <ul style="list-style-type: none"><li>- South American Palm Weevil (<i>R. palmarum</i>)</li><li>- Red Palm Mite (<i>Raoiella indica</i>)</li><li>- Red Ring Disease</li><li>-</li></ul>                                                                                                                                       | Accepted.           | Consultant to update                          |

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| GD              | F1<br>(Integrated<br>insect pest<br>managemen<br>t for<br>coconuts) | Page 29        | ed                                      | This table should either be separated into different categories or its title should be revised. The current title, "Integrated Insect Pest Management for Coconuts," is misleading because the table also includes diseases such as fruit rot, which are not insect pests. Additionally, some entries provide only descriptions of the pests rather than integrated pest management measures, as the title suggests. The content and title should be aligned to accurately reflect the information presented. | Consider restructuring the information into one or more tables with clear and descriptive titles, such as "Coconut Pests and Diseases" and "Integrated Pest Management (IPM) Strategies for Coconuts." The tables should be organized into sections that clearly distinguish between pests, diseases, their symptoms, and the corresponding management practices. | TBD....RTC/Consultant                                 | Consultant to update                          |
| TT              | Annex G                                                             | N/A            | te                                      | The crop protection handling guidance is useful, but disposal of surplus spray mix and wash water should be strengthened to prevent contamination of soil, water, drains and produce.                                                                                                                                                                                                                                                                                                                         | Add that surplus spray mix, rinsate and wash water must be managed according to label directions and national environmental requirements and must not contaminate water sources, drains, soil or produce.                                                                                                                                                         | Accepted. Addressed above in TT 3.5.6.4/3.5.6.4 above | Consultant to update                          |
| TT              | Annex H                                                             | N/A            | te                                      | The recommended intercrops and livestock are useful, but suitability depends on local agro-ecological conditions, pest risks, water availability, market demand and food safety considerations.                                                                                                                                                                                                                                                                                                               | Add a note that intercrops and livestock should be selected based on local conditions, market opportunities, pest/disease risks, water availability and competent authority guidance.                                                                                                                                                                             | Accepted. Addressed above in TT 3.7                   | Consultant to update                          |

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| TT              | 3.15 / Annex<br>I                                                | N/A            | te                                      | The documentation clause is important and Annex I is normative, but the relationship between recommended practices and minimum certification records is not clear.          | Clarify which records are minimum requirements for GAP certification or producer readiness, and include recommended record retention periods.                                | For GAP certification in coconuts, the most critical records are those that prove compliance with food safety, traceability, environmental management, and worker welfare requirements. | See updated Annex                             |
| TT              | Annex I                                                          | N/A            | te                                      | Traceability records should more clearly link production, harvest and dispatch to buyers, markets, packinghouses or processors.                                             | Add outgoing product records such as harvest date, product type, farm/plot code, lot/batch identification, quantity, buyer/destination, transport vehicle and dispatch date. | Accepted                                                                                                                                                                                | Noted                                         |
| TT              | General                                                          | N/A            | ed                                      | There are inconsistencies in document references, copyright years and footer details across the draft, including references to different document numbers in some sections. | Conduct a final editorial quality review to harmonise document number, year, title, footers, cross-references and copyright statements before publication.                   | Accepted.                                                                                                                                                                               | Noted                                         |

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