



## STAKEHOLDERS CONSULTATIVE FORUM ON THE DRAFT CROPS (FIBRE CROPS) REGULATIONS, 2025

### FINAL ALIGNED MASTER CONSOLIDATED STAKEHOLDERS COMMENTS

NO.	REGULATION/ SECTION	STAKEHOLDER ISSUE /COMMENT RAISED	STAKEHOLDER PROPOSALS	ACTION TAKEN	JUSTIFICATION
1.	General Comment	In exercise .....	Include preamble on power to make regulations by Minister in charge of Agriculture	A preamble introducing to read as follows .....	To provide the powers under Crops Act under Section 40 which the regulation are made
2.	General Comment	The document largely does not acknowledge presence of other Regulations/Acts	Link the document to other existing Acts/Regulations	Accepted	Cross referencing done where necessary
3.	General Comment	Inclusion of research development and innovation missing	Include it for development and posterity	Accepted	Research and development are provided for in KALRO Act

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4.	General Comment		Fibre crop to include food crops which are rich in fibre e.g. Banana stem, rice which can be processed into building materials.	Accepted	To provide for regulation and quality assurance of fibre produced from other scheduled crops
5.		Extension Officers; - I believe they used to do a commendation job by sensitizing the farmers to make an informed decision on what they want to plant in their farms	More extension officers should be employed to cover any gaps.	Accepted	It is being addressed administratively. National and County Government are rolling out agri-preneur model to augment public extension
		<b>PART I – PRELIMINARY</b>			
6.	2	'Act' means the Crops Act 2013	Currently it is CAP 318	Revised to capture Crops Act CAP 318	To align to the correct caption of the mother Act
7.	2	Authority established 'by' section .....	Change "by" to read "under"	Amended	To provide clarity
8.	2	Interpretation of County Government	Make clarity of the specific office referred to when mentioning County Government in the regulations.	Accepted	To provide clarity on where the application for registration and licensing will be submitted to

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			means the office of the County Executive Committee member for matters relating to Agriculture		
9.	2	Clarification between "crop produce" and "crop product"	<p>"fibre crop produce" means the harvest from a fibre crop</p> <p>"fibre crop product" means the output excluding apparels of processing fibre crop produce or product</p>	Accepted	To provide clarity <i>Revised the definition to accommodate regulation of fibres from other scheduled crops other than fibre crops</i>
10.	2	The text in the regulations and schedules mentions "fibre crop grower" while interpretation only address "grower".	Include word "fibre crop grower" then interpret as captured	Accepted	To provide consistency
	2	Interpretation "Grower entity"	Use grower "Association" in accordance with the Act Ref. Crops Act, 14(1)(e)	Amended	Align with Section 14(1)(e) of the Crops Act

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11.	2	Interpretation of manufacture	Define to mean processing of both cotton and sisal including other fibre crops.	Amended	To provide clarity <i>Expanded the interpretation to accommodate process fibre crops and fibre from parts of other scheduled crops</i>
12.	2	To differentiate smallholder grower from plantation grower	Specify the criteria for categorization as smallholder or plantation grower. What acreage?	A new definition inserted "smallholder grower" means a grower who cultivates less than 100 acres under perennial fibre crops or less than 10 acres under annual fibre crops	To provide clarity
13.	4	(c & d) The scope of the product is too wide & may imply apparels	Products should be restricted to cotton seed by products and sisal fibres & not fabrics Refer to interpretation of fibre crops product	Insert the definition of fibre crops products to provide for the level of	To provide clarity The scope of the product has been restricted to mean the output of primary and secondary processing of fibre produce and in

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				processing fibre crops products	the case of jute includes upto tertiary level
		<b>PART II – REGISTRATION AND LICENSING</b>			
14.	5	Registration of a smallholder fibre crop grower	Farmers to be registered under self-help groups and cooperatives. This supports in licensing where the famers co- guarantee each other	Amended to remove the requirements of farmers to register under Reg. 5(1)-(4)	Farmers would be encouraged to register under the Cooperatives and Societies Act.
15.	5(1), 33(1)(b)	A grower may register (not mandatory). But in Pg.15 section 33 (1)(b) Illegal to acquire from unregistered grower		Amended to delete regulation 33	To remove ambiguity <i>Amended to incorporate requirements of the Crops Act Section 18 &amp; 19</i>
16.	5, 6, 7, 8, 9, 12 & 14	There is no specific department in the county government designated to handle the rejection or approval of the aggregators license.	Consider having a committee at county level to evaluate registration, licensing.	Amended to replace County Government with County Executive Committee member	To provide clarity

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17.	5 (8) 5(7)	Change of particulars in the register, Why 60 days to intervene?	Make it shorter	Amended to 14 days	Shorter period of 14 days is adequate to complete notification
18.	6	Registration of growers and plantation growers	The societies should be given the power to grow without certificate, permits	Regulation 6 deleted	Compulsory Registration of plantation growers is contrary to Section 14 of the Crops Act which makes registration of plantation growers discretionary
19.	9(7) & 15(7)	Different penalties for registration of dealers (Aggregator & Export/Importer)	Consider harmonizing the penalties for registration for various actors in the value chain.	Deleted Reg. 9(7)	The offence and the penalty is provided for Section 16 (4) of the Crops Act
20.	10, 11, 11(1)& 12,	Certificate of compliance for aggregation store is issued by AFA whereas the designation of the store and licensing of aggregator is done by County. This causes confusion and duplication of role. There is need to	Suggestion: we propose that designation of aggregation store, compliance and licensing be done as one stop. The county that registers be left to do the other roles as well. The annual license be reduced to KES 500 for the store,	Amended to align designation and compliance requirement. Reg. 10 & 11	To ease the process of designation and compliance to standards

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		amalgamate the roles into one office			
21.	11	Is the manufacturer compliance certificate applicable to spinning factories?	Yes, due to fibre handling	Yes	Certificate of compliance is applicable to spinning factories
22.	11 (1)	The certificate of compliance for the aggregation store is issued by the Authority which should not be the case as the county government is the one who issues a license to aggregation stores.	The certificate of compliance should inform issuance of the license and should be done where production happens for better assessment. Proposes the certificate of compliance for aggregation store to be issued by the county government.	Amended to align designation and compliance requirement. Reg. 10 & 11	To ease the process of designation and compliance to standards
23.	11 (4)	Quality is key and 7 days to resubmit application may be too short.	Propose 14 working day to allow installations that may take some time.	Amended to provide for 14 days	To provide adequate time for corrective actions
24.	12(5)	Time for re-application is too short.	May be 14 working days could allow remedial measures to be undertaken.	Amended to provide for 14 days	To provide adequate time for corrective actions

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25.	12 (9)	Penalty	The penalty is so heavy	Amend paragraph 9 by deleting the words appearing immediately after the word 'offence'	The offense of an aggregator operating without a license is not provided for under the Crops Act
26.	12(9)	Why cover only for aggregation	Let this remain in part 37 only	Amend paragraph 9 by deleting the words appearing immediately after the word 'offence'	The offense of an aggregator operating without a license is not provided for under the Crops Act
27.	13	The requirement for setting up a manufacturing factory. This requirement should exclude small scale value addition processing units.	The term 'fibre crop product manufacturing factory' as repeatedly used in section, to exclude micro-gining, and hand loom weaving (cottage industry) units.	Amended to provide for cottage licensing fee	To promote development of cottage industries

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			The term 'fibre crop product manufacturing factory' as repeatedly used in section, may include an attributive adjective 'large scale' so to read as follows: 'new large-scale fibre crop product manufacturing factory,	Amended the side note to read setting up a manufacturing factory	To provide clarity and coherence
28.	13 & 14	Lack of categorization of dealer operations in regard to manufacture	Introduce thresholds in dealer operations to protect startups and value addition manufacturing for own use.	Amended to provide for cottage licensing fee	To promote development of cottage industries
			Consider categorizing dealers (small scale processing units - microgins) to encourage decentralization of processing of fibres	Amended to provide for cottage licensing fee	To promote development of cottage industries
29.	14	Processing regulations too stringent for small scale processors.	The requirement for licensing of fibre crop produce manufacturer This requirement to exclude small scale ginning and weaving processes.	Amended to provide for cottage licensing fee	To promote development of cottage industries
			The fibre crop produce manufacturer for the purpose of this section to be quantified to	Amended to provide for	To promote development of cottage industries

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			mean a manufacturer who processes more than five tonnes of fibre crop produce.	cottage licensing fee	
30.	14	Fibre crop product manufacturing licensing	Any manufacture below 20 tonnes per year to pay Kshs.5000 as licensing fees.	Amended to provide for cottage licensing fee	To promote development of cottage industries
		<b>PART III- STANDARDS AND QUALITY ASSURANCE</b>			
31.	Title PART III	The topic sentence has misspelt word: "Assurance"	Please spell it correctly	Amended	To correct the typographic error
32.	20	Extinction of local superior variety	In order to protect and promote indigenous varieties, allow farmers to use local registered varieties to prevent extinction of local superior varieties.	Delete Reg. 20	Seeds are regulated under Seed and Plant Varieties Act
33.	20	A grower shall only use planting materials from a source certified by KEPHIS. We only	Remove "from a source" from sentence	Delete Reg. 20	Seeds are regulated under Seed and Plant Varieties Act

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		certify planting materials and not source			
34.	20	Farmers should be allowed to use their own seeds.	No restriction in use of seeds from previous harvest.	Delete Reg. 20	Seeds are regulated under Seed and Plant Varieties Act
35.	20 (2)	..... fibre crop seeds	..... fibre crops seeds and/or planting materials ..... fibre crops seeds	Delete Reg. 20	Seeds are regulated under Seed and Plant Varieties Act
36.	21 (1)	Capacity building of stakeholders too general	Capacity building –Specific Timelines or often /have often annually.	Delete the sub regulation	County Governments to determine the best way to implement capacity building programmes
37.	21 (1)	Is misplaced. Provide for why these regulations?? Benefits that farmer will accrue	Consider having it in the section promotion and development of fibre sector.	Delete the sub regulation	County Governments to determine the best way to implement capacity building programmes
38.	21 (1)	Growers plantations - Registration of farmers & mobilization	Be supported by county Government through sensitization and capacity building of societies.	Delete the sub regulation	County Governments to determine the best way to implement capacity building programmes

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39.	21(1)	The national government shifting burdens to counties e.g. carrying out of capacity building by county governments yet there is no capacity and fibre crops value chain are not prioritized in resources allocation at the county.		Deleted	It is the responsibility of the County Governments to carryout capacity building of growers
40.	21 (1)	Maoni- Kuhusu Viongozi wanaoeneza umuhimu wa kilimo cha pamba, tunaomba nao wa wezeshwa ili (form no.16) wawe na moyo wa kufanya kazi kwa wepesi.	Mapendekezo yangu viongozi waweze kushikwa mkono ili kuinua kilimo ya pamba.	Alibainisha	Itatekelezwa kwa mpangilio ya kiofisi
41.	21 (2)	Restrictions to KS codes of practice	There could be other applicable standards that are adopted and approved.	Amend by replacing the word relevant with existing,	To provide clarity

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				national and regional codes of practice and remove the words any other best practices thereafter	
42.	21 (6)	Should farmers on contract farming sell their produce in designated aggregation stores	This should be at the discretion of the contractor/grower Fourth Schedule 1(j)	Amended to accommodate agreements between grower and dealers	The grower and the dealer may stipulate in their agreements modalities for collection of the produce
43.	21 (6)	Offering F.C produce for sale to designated aggregation centers?	Any option for growers to deliver produce directly to the factory?	Amended to accommodate agreements between grower and dealers	The grower and the dealer may stipulate in their agreements modalities for collection of the produce
44.	22 Introduce a new sub regulation	Traceability	Provide for an elaborate system for traceability of fibres from production to market.	Introduced a New Regulation on traceability system	To meet the global trade requirements and market access

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45.	23(4)(b)	Bale weights	Proposal to review the cotton baling weight to allow small scale processors to sell direct to spinners.	Amended to provide for bale weight of 50 Kgs	To cater cottage industries and local distribution
			The Regulations to consider revising the weight of bales down to allow for packaging of 50 kg.	Amended to provide for bale weight of 50 Kgs	To cater cottage industries and local distribution
46.	23 (4) (b)	Cotton lint bale weight	Bale size to be reduced to 50 kgs to allow for available /common transport means	Amended to provide for bale weight of 50 Kgs	To cater cottage industries and local distribution
47.	24	What are you doing on the same for upcoming crops like Bananas & or Bamboo etc.		Amended the interpretation of fibre and fibre crop to cater for fibres from other crops such as banana and bamboo	There is increasing use of other plant parts from other crops other than the traditional known fibre crops for fibre production
48.	25(2)	The way the clause is framed, the classing is optional. Rephrase to make it mandatory	A person producing cotton lint shall apply to the Authority for classing	Amended to make classing mandatory	To provide clarity

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49.	27(2)	Purchase of crop produce and fibre crop product	The farmer does not benefit from oil and cotton seed cake why silent in value.	Amended 28(6) by introducing a sub regulation on percentage of value of by products	To bring equity on revenue sharing along the value chain
50.	28(2)	Appointment of Fibre Crops Pricing Formula Committee	The committee to include one representative from small holders	Amended 28(2) to include 2 smallholder growers nominated by grower associations and a representative of plantation growers	To provide clarity on smallholder and plantation growers representation
51.	28 (2)	National cotton growers co- operative	Established Pricing committee a member from the union should be included	Amended 28(2) to include 2 smallholder growers nominated by	To provide clarity on smallholder and plantation growers representation

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				grower associations and a representative of plantation growers	
52.	28 2(d)	The No. should be 12 and not 9 the thing in every County we have a farm representative. Plus any ordinary farmer picked at random through the AFA office who is at the ground hence this will give the actual feeling on the ground in the Bottom up approach issue.	The approach should be bottom up approach the smallest farmer down there should be put in decision of prices issue rather than the authorities dominating the full committees we are talking about.	Amended 28(2) to include 2 smallholder growers nominated by grower associations and a representative of plantation growers	To provide clarity on smallholder and plantation growers representation
53.	28 (2) (d)	No grower representative. Authority representative and Ministry	One person representing a grower On fibre crop committee formation, the cotton farmer to be included. Provided for in Reg. 28(2)(d)	Amended 28(2) to include 2 smallholder growers nominated by	To provide clarity on smallholder and plantation growers representation

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		representative can be one person.		grower associations and a representative of plantation growers	
54.	28(2)(d)	Who forms the crops pricing formula committee	The farmer at the grassroot should and be part of the committee	Amended 28(2) to include 2 smallholder growers nominated by grower associations and a representative of plantation growers	To provide clarity on smallholder and plantation growers representation
55.	28(4)	Membership to Fibre Crops Pricing Formula Committee	Consider youth representation and regional balance in the pricing formula committee composition.	Amended Reg. 28(4) to consider regional balance and youth representation	To ensure inclusivity in accordance with the Constitution

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56.	28 (6)	The committee 'may' consider	Replace with the committee 'shall' consider	Amended to replace the word 'may' with 'shall'	To make it mandatory
57.	28 (6)	What to determine when coming up with a price of cotton	The Fibre Crops Pricing Formula Committee should consider the following product (a) oil from seed cotton (b) seed cake (c) lint	Amended by introducing a sub regulation on percentage of value of by products	To bring equity on revenue sharing along the value chain
58.	28 (6)	(a) – (e) is Ok. )	Add (f) Consider the prices of by products (oil, cake, seed	Amended by introducing a sub regulation on percentage of value of by products	To bring equity on revenue sharing along the value chain
59.	28 (6)	Seed production is not clear	Consider the opportunity cost of one area of law to determine the price of cotton + by products (oil, cake, seed)	Amended by introducing a sub regulation on percentage of value of by products	To bring equity on revenue sharing along the value chain
60.	28 (6)	(d) Revenue sharing between actors	Revenue sharing consideration price of seed oil and seed cake, other products.	Amended by introducing a sub regulation	To bring equity on revenue sharing along the value chain

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				on percentage of value of by products	
61.	28(6)(d)	Revenue sharing from oil and seed cake processing	Grower to get a revenue share accrued from oil and seed cake gotten from processing of seed cotton in the pricing of produce.	Amended by introducing a sub regulation on percentage of value of by products	To bring equity on revenue sharing along the value chain
62.	28(7)	Pricing once annually	Pricing formula at least quarterly or once a month	Amended to read 'on need basis'	Market forces are very dynamic and changes from time to time
63.	28(7)	Review of the pricing formula	Consider the review of the Fibre Crops pricing formula to be done annually. Use 'shall' instead of 'may'	Amended to replace the word 'may' with 'shall'	To make it mandatory
64.	29	The issue of respective County Government determining the conditions for inter- County movement of fibre crops produce & product	We recommend that the National Authority should come in in order to prevent the abuse of this rights by the County Government to make sure cess is paid at the origin of the product only.	Delete Regulation 29	To be dealt with through inter- governmental relations

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65.	29	Movement permit	The movement of fibre crop produce/product should be respected by all counties provided the transporter/dealer has acquired the aggregator license from one county.	Delete Regulation 29	To be dealt with through inter-governmental relations
66.	29	Inter county movement of fibre crop produce and fibre crop products	Inter county fibre crop movement to be free but cess to be paid to the producing county (county of origin).	Delete Regulation 29	To be dealt with through inter-governmental relations
67.		Protection of stakeholders from double taxation that may arise from inter county movement of fibre crops produce/product.	Consider paying cess fee at the County of origin.	Delete Regulation 29	To be dealt with through inter-governmental relations
68.	29	The respective County Government	Amend to read 'Respective County Government' to accommodate as many county government as possible.	Delete Regulation 29	To be dealt with through inter-governmental relations
69.	29	Transportation of crops i.e. seed cotton to Nairobi or to a ginnery or factory	There should be one levy to every county	Delete Regulation 29	To be dealt with through inter-governmental relations

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70.	29	Movement of fibre crop produce and product County government charge for every border	Should be charged once at the exit point and quantity be specified	Delete Regulation 29	To be dealt with through inter-governmental relations
71.	29	Inter County movement of fibre crop produce and product	This should be free movement and a note issued at dispatch to avoid police harassment.	Delete Regulation 29	To be dealt with through inter-governmental relations
72.	29	Counties levying taxes when transiting their county.	To promote free movement of fibre crops products, counties should not tax across their counties.	Delete Regulation 29	To be dealt with through inter-governmental relations
73.	29	Why is it that after the County Government already issued license to the group or society? Why is it that again the same government want to take "cess" they move around with the receipt book of i.e. 50/= or 100/= or 200/=	Please let the County Government give his officers clear duties on collecting revenue twice to the cotton seed dealers most importantly the aggregator stores	Delete Regulation 29	To be dealt with through inter-governmental relations

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		<b>PART V- INSPECTION AND COMPLIANCE</b>			
74.	34	Will these be not be corruption and we buy non-compliance seeds and nursery	I recommend that the non-compliance be undertaken by both the county and Authority to minimize corruption.	Amended by providing that the licensing authority that issued the license shall be the entity to issue the notice of non-compliance	To provide clarity on the entity issuing notice of non-compliance
75.	34(3) & 37	Why impose hefty fines for non-compliance?			Penalties are necessary for deterrence and are provided for in the Crops Act
		<b>PART VI- MISCELLANEOUS PROVISIONS</b>			
76.	40	Dispute resolution	Establish a grievance redress mechanism for all players probably a tribunal	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
77.	40	Dispute resolution should not be referred to the County	AFA may be neutral.	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution

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		Government because the County Government are politicians and would be biased seeking for populistic in decision making.			
78.	40	Disputes referrals	CECM Agriculture cannot resolve disputes if he isn't a member of crop committee (sec 28) How can he solve pricing issues for example.	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
79.	40	Referral of Disputes	Expand the membership of dispute resolution to include CEC Trade, Cooperatives and Industry	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
80.	40	Referral of Disputes	Consider bringing in the Kenya National Cotton Growers Federation for settlement of disputes.	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
81.	40	Regulations lack the time frame within which disputes raised to the CECs are resolved.	Provide time frame.	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution

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82.	40	Dispute resolution	(1) Establish a grievance redress mechanism for all players probably a tribunal	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
83.	40	Dispute resolution	Dispute last stage – Ministry of Agriculture	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
84.	40	County Executive member for cooperatives missing in dispute resolution	Include the CEC responsible for matters cooperatives	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
85.	40	Dispute Resolution	Could we have a committee or board in conflict resolution comprising all the stakeholders	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
86.	40	Dispute resolution	We encourage formation of an independent committee or board	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
	40	Dispute resolution by County Executive committee member responsible for Agriculture	Should be left to Authority level as County shall be of interest	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
87.	40	Dispute Resolution	Disputes between a grower and dealer should be handled by the Authority or a body appointed rather than the respective	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution

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			County Government. They view the growers as potential voters and will always side with the grower.		
88.	40	Dispute Resolution	Kenya National Cotton Growers Co-operative Union (KENACGCU) Limited as a union for cotton farmers should be included in dispute arising between growers and dealer.	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
89.	40	Dispute Resolution	Matters be dealt with by county CECM responsible for Cooperatives	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
90.	40	Days to solve dispute	How many days does it need to resolve a dispute by the	Delete Regulation 40	Access to justice for dispute resolution is already provided for in the Constitution
		<b>SCHEDULES</b>			
91.	Fourth Schedule	Missing a copy to the dealer	To incorporate a copy of the agreement for the dealer	Amended to provide for quadruplicate copies of the agreement with one copy being retained by the dealer	To ensure the dealer has a copy of the agreement

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92.	Eighth Schedule	Aggregator license and compliance certificate fees	Proposal to review fees for fibre crop produce/product aggregator license from Kshs. 5,000/= to 1,000/= and compliance certificate for aggregation stores from Kshs.5,000/= to 1,000/= per store.	Amended by reducing the license fee	There is need to improve on ease of doing business.
			Consider review of license charges especially for aggregators and manufacturer since County Government issue business trading license.	Amended by reducing the license fee	There is need to improve on ease of doing business.
93.	Eighth Schedule	Reg. Certificate of an aggregator	Asked about registration either so as to have at least 5 aggregation store to pay to register each for 5,000 this will be so high for the societies and also farmers.	Amended by reducing the license fee	Registration is free, however, there is need to improve on ease of doing business.
94.	Eighth Schedule	Certificate of compliance for aggregator store	Fees to be reduced by half	Amended by reducing the fee	There is need to improve on ease of doing business.
95.	Eighth Schedule	Manufacturer license fee	Consider reviewing downwards the manufacturing license from	Amended by reducing the license fee	There is need to improve on ease of doing business.

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			Kshs.20,000/= to act as incentive to investors.		
96.	Eighth Schedule (8)	Fibre crop product manufacturing licensing	Any manufacture below 20 tonnes per year to pay Kshs.5000 as licensing fees.	Amended by reducing the license fee for the manufacturer and waiving cottage industries and SMEs	There is need to improve on ease of doing business
97.	Eighth Schedule	To pay Kshs.20,000 for manufacturing license	License fee should be defined by capacity	Amended by reducing the license fee for the manufacturer and waiving cottage industries and SMEs	There is need to improve on ease of doing business
98.	Eighth Schedule	Why is lint export license Kshs. 50,000 and the lint import Kshs. 20,000?		Amended by reducing the export license fee to Kshs.20,000	To facilitate ease of doing business

NO.	REGULATION/ SECTION	STAKEHOLDER ISSUE /COMMENT RAISED	STAKEHOLDER PROPOSALS	ACTION TAKEN	JUSTIFICATION
99.	Eighth Schedule (4)	Fees for license for cotton 50,000 is grow up	U can help us to reduce that amount	Amended by reducing the license fee for the manufacturer and waiving cottage industries and SMEs	There is need to improve on ease of doing business
100.	Eighth Schedule (5)	Cotton lint import license	Why don't they be the same	Amended by reducing the license fee for the manufacturer and waiving cottage industries and SMEs	There is need to improve on ease of doing business
101.	8th Schedule	item 2 & 3 2% of import value 4% of import value	Replace "import value" with custom value (CIF) for clarity	Amended by replacing import value with CIF	To provide clarity
102.	Eighth Schedule	The levies imposed on cotton export is higher than import, but other	For a country to gain, export licensing should be lower that	Amended by reducing the export license	To facilitate ease of doing business

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		products are: Imports is higher than export. Why?	import to raise waiver for the farmers or producers	fee to Kshs.20,000	
103.	8 <sup>th</sup> Schedule	Importation verses Exportation rates for cotton licenses	Higher rates for importation than exportation.	Amended by reducing the export license fee to Kshs.20,000	To facilitate ease of doing business
104.	Eight Schedule Fees for licenses. Licensing 4 & 5, 6 & 7	Licensing, Inspection and levies payable to Authority. Consideration to support contract farming for growers and grower base may be entered by proposed fees encouraging import other than export	Reconsider cotton lint export/import licenses and fibre crop product export/import licenses to encourage smallholder growers/grower base cotton production.	Amended by reducing the respective fees and levies	To facilitate ease of doing business. The export and import levy is expected to generate revenue to support the industry including the smallholder grower