Version: 4 of 26 April 2021

<mark>**Changes highlighted in yellow (26 April 2021)**</mark>

Instructions for EFISC-GTP Certification Bodies regarding the management of postponed audits and full remote audits

1. Introduction

EFISC-GTP recognizes COVID-19 as an extraordinary event that could affect the audit frequency of auditors operating in the scopes of EFISC, GTP and EFISC-GTP codes.

As a consequence, EFISC-GTP Certification Bodies are allowed to postpone audits (surveillance, re-certification and unannounced) for a period that should not exceed six months as **of March 6th** 2020, <u>if there is sufficient documented proof that the certified management system is effective</u> (see paragraph 3 of IAF ID 3: 2011). When the re-certification audit cannot be performed, the validity of the certificate can be extended until the day of the new audit. The eligibility of delivery to the other EFISC-GTP mutually recognized schemes is confirmed even if the audit will be postponed.

In agreement with **IAF ID 3: 2011** (Informative Document For Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations), paragraph 3, letter c, the re-certification should be carried out within this permissible extended period. See paragraph 2 for more details. Certification Bodies are requested to:

a. inform weekly EFISC-GTP Aisbl regarding the audits that will be delayed

b. for those companies where the re-certification audit has been postponed, produce and send to EFISC-GTP a temporary certificate (in English) showing at least the following information:

- Name of the Certification Body that will issue the new document

- Name of the company covered by the certification

- Reference to the expired certificate (certificate number)

- Date by which the validity of the certificate has been extended

This temporary certificate will be uploaded to the EFISC-GTP website to replace the expired certificate.

2. Postponing reasons

In order to postpone audits (surveillance, recertification and unannounced), the following aspects must be considered by the Certification Bodies:

- Recommendations coming from regulations adopted by the sector organizations
- Internal policy of EFISC-GTP certified companies related to safety issues (related to COVID-19)
- Internal policy of Certification Bodies
- Governmental rules such as travel restrictions, lockdown, etc.

3. Management of the postponed audits

3.1 Initial certification

Initial certification can only be operated when the full planned audit is possible: therefore, when normal operation and auditing is not possible due to COVID-19 related safety issues, initial certification is not possible either. In case the Certification Body decides (in agreement with the company) to apply the clause 9.2.3.1.3 of ISO/TS 22003: 2013 (part of the stage 1 conducted off-site[1]), the full onsite second stage audit must be performed in 6 months.

Exceptionally, in agreement with paragraph 3.2 of RvA-T051-UK - Version 5, EFISC-GTP could grant to the Certification Body the possibility to perform the initial audit remotely: this will be evaluated by EFISC-GTP on a case by case basis. For scope D (feed production), only companies that are already certified against a recognized feed/food scheme by EFISC-GTP[2], are eligible to be remotely audited for EFISC-GTP. For initial audits, all the conditions described in paragraph 3.5 and 4 of this document apply.

3.2 Surveillance audits

Surveillance audits must be completed as soon as the normal situation and operation is restored. In case of the first surveillance audit after initial certification, a postponement of the audit should not exceed 6 months (18 months from date of initial certification).

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[1] Regarding the use of information and communication technology (ICT) for auditing, please refer to the paragraph 3.5 of this document.
[2] as indicated in annex 3 of the EFISC-GTP Code 4.0

During postponement, the Certification Body may consider other means of company monitoring that are available, such as remote assessments (refer to IAF MD 4), desktop reviews of documentation submitted or other methods.

3.3   Re-certification audits

For re-certification audits that need to be postponed (see paragraph 2) Certification Bodies should verify if there is sufficient documented proof that the certified management system of the EFISC-GTP company (or EFISC or GTP) is effective. In this case, a remote assessment of the quality documentation[3] should be performed by the Certification Body (refer to IAF MD 4). After the positive evaluation carried out by the Certification Body, the expiring date of the certificate can be postponed for a maximum period that should not exceed 6 months.

Certification Bodies should also define a new appointment of the on-site audit in agreement with the certificated company.

3.4   Unannounced audits

Unannounced audit follows the postponing rules indicated in paragraph 3.2. The limitations indicated in paragraph 7.1 of the EFISC-GTP rules of certification do not apply in this particular situation. In agreement to the indications provided in paragraph 4, unannounced audits could be performed remotely only if they can not be postponed anymore, announcing the audit during the previous 24 hours.

3.5   Use of information and communication technology (ICT) for auditing

The use of information and communication technology by EFISC or GTP or EFISC-GTP Certification Bodies assessing certificated companies must follow the indications contained in **IAF MD 4 (2018)**.

Information and communication technology could be used in the following cases[4]:

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[3] This may include requesting relevant documentation for example, management review meeting minutes, corrective action records, results of internal audits, test/inspection reports, etc.

[4] Regarding the use of ICT, the cases not mentioned in the paragraph 3.5 will be evaluated by EFISC-GTP on a case by case basis: a communication to EFISC-GTP needs to be sent.

- To provide confidence that the certified management system of the EFISC-GTP company is effective in case of surveillance and recertification audit (see paragraph 3.3);
- During postponement of surveillance audits;
- To perform part of the surveillance and renewal audit for companies involved in production (scope D) in agreement with the requirements indicated in annex B of ISO 22300:2013;
- To perform the surveillance and renewal audit for companies (GTP companies) not involved in production;
- To perform the entire surveillance and renewal audit (for initial audit, see paragraph 3.1) for EFISC-GTP companies (scope D, F and G): see paragraph 4;
- To perform upgrade audits as described in the paragraph 5 of the "Transition guide for the conversion of v3.1 EFISC and v1.3A GTP code to v4.0 EFISC-GTP scheme"

In the last 4 cases[5], the Certification Body, in agreement with the company, may perform the off-site renewal/surveillance audit using all means of monitoring that are available. In order to verify the prerequisites, Certification Bodies can request also videos or films. Certification can be granted by the Certification Body only if sufficient evidence has been collected by the auditor in order to propose them for certification. Certification Bodies are requested to indicate in the report – to be shared with EFISC-GTP - that an off-site audit was conducted.

4. Full remote audit for EFISC-GTP companies

In agreement with the operator, the Certification Body may perform a full remote audit[6] for EFISC-GTP companies (scope D or F and G or D, F and G)[7]. Before to perform it, the Certification Body, in cooperation with the operator, shall conduct a risk assessment finalized to:

- determine the risk of maintaining certification according to the paragraph 3 of IAF ID 3: 2011 (it should be low);

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[5] The Certification Bodies should verify if the possibility of conducting the audit remotely is allowed by their Accreditation Body

[6] The full remote audit (EFISC Code 3.1 or EFISC-GTP Code 4.0) can be performed only if at least one of the following conditions is met:

- The operator can clearly demonstrate to the Certification Body that performing an on-site audit in the company premises is not allowed by the company's internal regulations specifically aimed at reducing the spread of COVID-19
- The travelling of the auditor (in or from the departing and/or arriving countries) is restricted due to COVID-19 safety related issues. Application of quarantine rules due to the travelling among different countries that can limit the normal working activity of auditors is also considered a restriction. In this case, official governmental rules and regulations to travel must be considered.

[7] The EFISC-GTP full remote audit is an accredited voluntary option that can be only utilized in the case described in the paragraph 1 of this document.

- determine if the full audit objectives can be achieved through the use of ICT (see paragraph 3.5);
- determine if there are sufficient digital means available to assess the audit fully remote and to audit all applicable EFISC-GTP requirements (see letter "a" of this paragraph).

The full remote audit shall be performed in agreement with the following:

a. The Certification Body should confirm and test the compatibility of the ICT platform with the operator. In this sense, a **trial meeting** using the same media platforms should be conducted to ensure that the scheduled remote audit can be performed as planned: if the test detects problems that may prevent the audit from being performed, the scheduled remote audit cannot be carried out;
b. It is strongly recommended that the 'remote' audit (for scope D) includes video visual streams (e.g. use of webcam/cameras), which must be portable around the site, especially in the places (productive areas and storage places) so that the auditor can observe remotely relevant details of the facilities, hygiene procedures and discuss operations with staff members. Recording of video/audio is possible only if specifically agreed with the operators;
c. In case of impossibility to carry out the audit, for example due to connection problems, the audit shall be rescheduled and carried out within a period not exceeding 20 days;
d. During the remote audit, all the requirements indicated in annex 3 (general assessment) of the EFISC Rules of certification version 3.1 (annex 4 in version 4.0) shall be checked by the auditor;
e. The calculation of the audit time shall be done according to paragraph 7.1.3 of the Rules of certification (EFISC Code 3.1 or 4.0): this time must be comprehensive of both **off-line** (for example the review of documents) and **on-line** activities (live visual stream for interviews or for viewing places of the site). The repartition of the total audit time (time spent off-line and on-line) should be defined by the Certification Body and shall also take into account the company complexity. In agreement with the operator, Certification Body can divide the visit into several days;
f. It is recommended to the Certification Body to appoint the auditor who carried out the last audit in the same site even if he/she carried out already 3 consecutive audits at the same site;
g. Certification Bodies are requested to provide to EFISC-GTP at least 10 days in advance the list of companies that will be audited remotely. In agreement with article 2.5 of the Rules of certification, EFISC-GTP will conduct an assessment of the auditor performance during the remote audit. The number (out of the total) of the remote audits that will be monitored will be defined.

5. Consulted Documents

IAF ID 3: 2011 (Informative Document For Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations)

IAF MD 4:2018 (International Accreditation Forum, Inc.): MANDATORY DOCUMENT FOR THE USE OF INFORMATION AND COMMUNICATION TECHNOLOGY (ICT) FOR AUDITING/ASSESSMENT PURPOSES

Dutch Accreditation Council (RvA) - Management of extraordinary events or circumstances affecting RvA accredited bodies and their customers. Document code: **RvA-T051-UK** - Version 5, 07 May 2020.