EFISC.GTP

Use of Information and communication technology (ICT) in EFISC-GTP standard

Version: 1.0 of 14/07/2023

Contents

Version	Title	Publication date	Final implementation date
1.0 of 14.07.2023	Use of Information and communication technology (ICT) in EFISC-GTP standard		

1.0 Introduction

This module describes the requirements for the use of Information and Communication Technology (ICT) by Certification Bodies performing EFISC-GTP auditing activities. The IAF Mandatory Document MD4 (see References) shall be used by the Certification Body as a reference document together with the requirements provided in this module.

2.0 Terms and definition

In addition to the terms and definitions mentioned in the EFISC-GTP Standard (paragraph 2.6.1), the following terms are used in this document:

Extraordinary event or circumstance: A circumstance beyond the control of the organization, commonly referred to as "Force Majeure" or "act of God". Examples are war, strike, riot, political instability, geopolitical tension, terrorism, crime, pandemic, flooding, earthquake, malicious computer hacking, other natural or man-made disasters.

Hybrid audit: audit consisting in two steps, which should be delivered in the following order:

- Step 1: Remote audit consisting of a document review and interviews with (key) personnel using ICT;
- Step 2: On-site audit focusing on the verification and implementation of the FSMS (including HACCP), PRPs, the inspection (physical) of the process area and any remaining requirements not covered during the remote part of the audit.

Information and Communication Technology (ICT): ICT is the use of technology for gathering, storing, retrieving, processing, analyzing and transmitting information. It includes software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence, and others. The use of ICT may be appropriate for auditing/assessment both locally and remotely (IAF MD4:2023).

3.0 General principles

The standard method for conducting EFISC-GTP audits (as set out in section 7 of the EFISC-GTP Rules of Certification version 4.1) is via on-site audits. An alternative method is to use hybrid or full remote audits as defined in this module. These options can only be applied if all criteria provided here are met. The use of hybrid audits and full remote (described in paragraph 5) is voluntary, and must be mutually agreed between the EFISC-GTP operator and the Certification Body. In case of hybrid audit, 2 steps shall be performed, preferably in the following order:

- Step 1 (remote audit): it shall be performed from a different location than the audited organization,
- Step 2 (on-site audit): it shall be performed at the physical location of the audited organization (EFISC-GTP operator).

Before to perform a hybrid audit, the Certification Body, in cooperation with the operator, shall conduct a risk assessment finalized to:

- determine if the ICT audit approach is a feasible option;
- determine if the audit objectives can be achieved through the use of ICT;
- determine if there are sufficient digital means available to perform the audit.

The Certification Body must have internal documented procedures in order to determine and approve the ICT method. The Certification Body must ensure that:

a. requirements contained in the IAF MD4 are met;
b. the total audit duration of the 2 steps is based on the indication provided by the paragraph 7.1.3 of the EFISC-GTP Rules of Certification version 4.1;
c. auditors involved in remote audits are EFISC-GTP qualified (see paragraph 3.1.4 of the Rules of Certification version 4.1)

Before to perform the Step 1 (Remote audit), the Certification Body has to:

d. verify that the EFISC-GTP operator accepts audits conducted remotely and that it has the ability and competence to conduct an audit remotely. The certification body must also verify that any requests from the customer in terms of confidentiality, security and data protection are identified and correctly implemented;
e. 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 (Step 1) 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;
f. provide to auditors (if needed) conducting remote audits training on the use of ICT.

Moreover, it is recommended that:

g. 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 preferably 20 days;
h. step 2 of hybrid audits should preferably take place within 30 days of step 1 (90 days in case of occurring of extraordinary events: see paragraph 5.1)

4.0 Applicability

Audits based on ICT, may be applied in case of annual EFISC-GTP audits (recertification, unannounced and surveillance) with the conditions and limitations set out in paragraph 3 and 5 of this document. For initial audits, stage 1 shall be carried out at the EFISC-GTP operators (on-site) in order to achieve all the audit's objectives (ISO 22003: 1- 2022, cl. 9.3.5). In exceptional circumstances or events, all (full remote audits: see paragraph 5) or part (hybrid audits) of stage 1 can take place off-site or remotely through the use of ICT and shall be fully justified[1]. The evidence demonstrating that stage 1 objectives are fully achieved shall be provided. The interval between stage 1 and stage 2 shall not be longer than six months. Stage 1 shall be repeated if a longer interval is needed. In case of hybrid audits, the on-site component cannot be less than 25 % of the total audit duration: Certification Body must document its decision.

5.0 Full remote audits

In agreement with the operator, the Certification Body may perform a full remote audit for EFISC-GTP companies (scope D or FI/FII and G or D, FI/FII and G) in the following cases only:

[1] Exceptional circumstances or events can include a natural disaster and a pandemic. Situations such as very remote locations or other special situations shall be discussed with EFISC-GTP Aisbl. Any part of the FSMS that is audited during the stage 1 audit, and determined to be fully implemented, effective and in conformity with requirements, does not necessarily need to be re-audited during stage 2. In this case, the audit report includes these findings and clearly states that conformity has been established during the stage 1 of the audit.

a. In case of extraordinary events as defined by EFISC-GTP Aislb (see paragraph 5.1);
b. in the case of traders (scope FII) who carry out their activity exclusively on paper (the so-called paper traders). In this case, the Certification Body shall demonstrate together with the operator that:
   - the site that will be subjected to a full remote audit has not been involved in any incidents (relevant for food/feed safety) during the last certification cycle (**performance history**);
   - through a feasibility assessment, all audit objectives can be achieved by performing the entire audit remotely (ICT): both the Certification Body and the EFISC-GTP operator have the capability to carry out an audit entirely remotely covering all parts of the audit.
c. in case the Certification Body decides together with the multisite EFISC-GTP operator that, part of the annual audits (see paragraph 7.1.1 of EFISC-GTP Rules of Certification version 4.1) could be performed remotely. In this case, the Certification Body shall demonstrate together with the operator that:
   - the sites belonging to the EFISC-GTP operator perform the same activity (**repetitiveness of the activity**: e.g. storage activity);
   - the site that will be subjected to a full remote audit has not been involved in incidents (relevant for food/feed safety) during the last certification cycle (**performance history)**;
   - through a feasibility assessment, all audit objectives can be achieved by performing the entire audit remotely (ICT): both the Certification Body and the EFISC-GTP operator have the capability to carry out an audit entirely remotely covering all parts of the audit. The feasibility study must also take into account the degree of non-conformities (if any) that were issued during the previous audit.
   However, it is necessary that all sites receive a full onsite audit (or a hybrid audit) during the 3-year certification cycle.
d. in the event that due to a serious situation, it is necessary to interrupt a remote audit (step 1), and it is absolutely necessary to convert the audit to full remote. In this case it is necessary that the Certification Body receives an authorization from EFISC-GTP Aisbl.

In addition to the requirements indicated in the paragraph 3 of this document (point a, c, d, e f and g), the Certification Body should also verify that:

- the site that will be subject to a full remote audit must be operational at the time of the audit;
- for the purpose of an efficient planning of remote activities, if necessary, the Certification Body could have to add time for carrying out the audit;
- if it is necessary that, in order to increase the efficiency of the full remote audit, the Certification Body, before the full remote audit, requests the EFISC-GTP operator documents such as site maps, list of CCPs, flow charts, information of employees involved in the feed/food process, pest management plants, etc.. Receiving this information sooner could facilitate the conduct of the audit.

Carrying out an audit remotely could require the use of different ICTs: the use of these should be defined before the audit and agreed with the EFISC-GTP operator who will be fully remotely audited. For this reason it may be necessary to carry out the audit at different times in order to optimize the use of the different ICTs. It could be also required to include video visual streams (e.g. use of webcam/cameras) during the audit. Video visual stream must be portable around the site, especially in the places (for example 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.

Examples of different ICT technologies that could be used during a full remote EFISC-GTP audit:

- ***video conference, checking previously sent documents****: opening and closing of the meeting, discussions on the scope of certification, human resources employed (interviews with employees), policy of the operator, employees 'skills, closure of non-conformities, crisis management, customer relations, internal audits, management reviews , prerequisite program, traceability, risk assessment, etc..*

- ***video conference, video visual stream (for example through the use of smart phones), photos, video cameras, checking previously sent documents****: infrastructure analysis, cleaning efficiency check, tools used for pest control and waste management, etc..*

5.1 Management of extraordinary events

In order to guarantee the carrying out of the audit activities even in case of extraordinary events, the Certification Body should have a procedure which allows to review the planned audits. In case of extraordinary events, the Certification Body shall:

a. contact EFISC-GTP in order to receive a confirmation that the event that is happening could be considered extraordinary;
b. determine the risk of maintaining the certification according to the paragraph 3 of IAF ID 3: 2011 (it should be low);
c. apply the indications provided in the paragraph 5 of this module.

References

- IAF Mandatory document for the use of information and communication technology (ICT) for auditing/assessment purposes (IAF MD 4:2023)
- IAF Informative Document For Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations (IAF ID 3: 2011)