



ASC POLICY FOR AUDITS DURING THE COVID-19 OUTBREAK

VERSION 18 MARCH 2020

Update 19 March 2020: Change on the Table Annex 1: ASC Country Social Profile

This Policy supersedes and replaces our earlier notifications of 5/ March/ 2020 and 6/ March/ 2020

This Policy is valid from publication date until September 30th 2020 or until further notice - whichever comes first

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1. Background

The following policy is to provide some flexibility to CABs and ASC Certificate Holders affected by the global COVID-19 pandemic.

The impacts of travel restrictions may be eased by remote and/or assisted remote audits, or certificate extensions, depending on various criteria set out below.

2. Reference documents and information

- [ASC Certification and Accreditation Requirements \(CAR v.2.2\)](#)
- Relevant variations/interpretations (links below)
- [General Data Protection Regulation \(EU\) 2016/679](#) - GDPR
- [ASC published policy](#)



- [IAF MD 4 :2018](#) for the use of information and communication technology for auditing/assessment purposes (issue 2)
- CABs COVID-19 internal policies
- [WHO](#) situation report and advice

3. Scope

- 3.1 This policy is normative for all ASC audits that will be conducted during the COVID-19 outbreak.
- 3.2 All ASC CAR requirements not referenced or related to this policy shall remain applicable.

4. List of abbreviations and definitions

- 4.1 CAB - Conformity Assessment Body
- 4.2 CAR - ASC Certification and Accreditation Requirements
- 4.3 CH - Certificate Holder
- 4.4 COVID-19 - New coronavirus disease
- 4.5 IAF ID - International Accreditation Forum Informative Document
- 4.6 IAF MD - International Accreditation Forum Mandatory Document
- 4.7 ICT – Information and Communication Technology
- 4.8 GDPR - General Data Protection Regulations
- 4.9 Q&A - ASC Question and Answer/Interpretation
- 4.10 WHO – World Health Organisation
- 4.11 Remote audit: An audit of a farm/site that is not conducted on-site. Remote audit may include off-line (e.g. desktop review), or real-time (e.g. FaceTime, e-interviews) approaches, or combinations thereof. During a remote audit, audit evidence and other information are collected, verified and triangulated using Information and Communication Technology (ICT). Conditions for remote audits are defined under section 6 of this document. Examples of Information and Communication Technology (ICT) used during remote audits are but not limited to:
- Teleconferencing using video and/or audio
 - Sharing of data
 - Assessment of documents through remote sharing, teleconferencing or other means



- Video and/or audio streaming from remote locations
- Records of video and/or audio and/or video stills and/or screenshots.

4.12 Assisted remote audit: An audit that is conducted partly remotely and partly on-site. It typically occurs when at least one auditor (not technical expert or interpreter) of the audit team is able to be on site while the rest of the team are not due to the travel restrictions. The remote auditor shall coordinate and guide the collection of evidence with the auditor on-site.

5. ASC auditing scenarios and options

Table 1 below describes different scenarios and possible options for CABs to continue providing ASC certification services in cases where local authorities, certificate holders (CH) or CABs' policies restrict the auditors' ability to conduct on-site audits (initial, surveillance and re-certification) to avoid the spread of COVID-19.

If there are no restrictions in the country where the CH are located (i.e. availability of local audit teams) the CAB shall conduct audits as usual, following the applicable CAR requirements and available interpretations.

TABLE 1. ASC audits scenarios

Scenarios	Applicability	CAB
5.1 Surveillance Audit (SA)	1. All surveillance audits scheduled for the validity period of this Policy (from March 17 - Sep 30 2020), according to the window of opportunity defined by Q&A5 (\pm 3 months from the certificate issuance date) and the all standard indicators as described in Q&A 45	<p>Option 1: Postponement Postponement of the audit until the end of the restrictions caused by the outbreak. ASC is waiving the applicability of Q&A5. CAR 17.15.6 remains applicable.</p> <p>Option 2: Remote audit</p> <p>SA1: Remote evaluation of ASC standards indicators which don't need on-site verification. Indicators which need onsite verification can be evaluated later during SA2.</p> <p>SA2: For indicators not evaluated in SA 1 that need on-site verification the CAB shall conduct remote auditing following the instructions of IAF</p>



		<p>MD 4 :2018 or follow option 1 or 3.</p> <p>Option 3: Assisted remote audit</p>
5.2 Re-certification audit	<p>1. All CH with certificates reaching the expiration date.</p>	<p>Option 4: Postponement Existing certificates may be extended for a maximum of 6 months from the expiration date for the certificate holders that already applied for the re-certification process with their CAB before 18 March 2020.</p> <p>Postpone on-site re-certification audits until the restrictions are lifted.</p> <p>Option 5: Remote audit For indicators that need on-site verification the CAB shall conduct remote auditing following the instructions of IAF MD 4 :2018 or follow option 4 or 6.</p> <p>Option 6: Assisted remote audit</p>
5.3. Initial audit	<p>1. Applicants already managing ASC certified site(s) applying for certification of a new site that has been in operation for at least one complete production cycle prior to audit.</p>	<p>Option 7: Remote audit For indicators that need on-site verification the CAB shall conduct remote auditing following the instructions of IAF MD 4 :2018 or follow option 8.</p> <p>Option 8: Assisted remote audit</p> <p>Note: For indicators which require the collection of samples and/or visits to the farms by third parties, if that is restricted by applicant or third party policies, the CAB shall use as reference of compliance the last audit results from the other farms managed by the applicant in combination with historical data of the applicant site.</p>
	<p>2. Applicants managing other ASC certified sites and applying for certification for a new site running its first production cycle.</p>	<p>On-site audit is required. If it is not currently allowed by the travel restrictions, it would need to be postponed.</p> <p>Remote or assisted remote auditing is not permitted.</p>
	<p>3. Applicants managing no ASC certified sites applying for certification for either a new site or site that has</p>	<p>On-site audit is required. If it is not currently allowed by the travel restrictions, it would need to be postponed.</p>



	been in operation for more than one complete production cycle	Remote or assisted remote auditing is not permitted.
5.4 Certificate transfer	1. Either a CAB is no longer permitted to deliver ASC farm certification services or a CH decides to change CABs	<p>a. Preceding and Succeeding CABs shall agree on a transfer date when the succeeding CAB will issue a new certificate.</p> <p>b. The required transfer audit within three (3) months from the transfer date may be remote or assisted remote.</p> <p>c. When the required transfer audit coincides with a surveillance audit (time wise), the audit may follow any option under 5.1 above.</p>

6. Conditions for the use of (assisted) remote auditing

- 6.1 (Assisted) Remote auditing can be conducted only with the following conditions:
- 6.1.1 Official travel bans or restrictions shall impede an on-site visit to at least one audit team member. In cases where the internal policy of the CAB and/or CH/applicant does not allow the audit to be conducted, this must be backed up by an official external source.
 - 6.1.2 CABs are required to follow all the requirements in the [IAF MD 4 :2018](#) and Section 6.3 of this document.
 - 6.1.3 The auditors (remote or on-site) shall have conducted at least two ASC audits in the standard that they are auditing in the same role (lead or social auditor). These two audits shall have been conducted after auditor’s sign-off by the CAB. Shadow audits for initial approval shall not be considered.
 - 6.1.4 For preparation for remote or assisted remote re-certification and initial audit the CAB shall review the outcome of self-assessment completed by the CH/applicant prior to the actual (remote) audit. The ASC pre-assessment checklist per species standard can be used and is available on the ASC website. The CAB shall inform its client about this condition, among others.
 - 6.1.5 The CAB shall update the audit announcement (section 1.9.3 Form 3) or indicate that the audit or (which) parts of the audit will be performed remotely.
 - 6.1.6 The CAB shall record in the audit report
 - 6.1.6.1 That the audit has been carried out (assisted) remotely (section 8.3.2 Audit Report Opening tab)
 - 6.1.6.2 Methodologies and tools used to collect evidence during the (assisted) remote audit (section 7.3 Audit Report Opening tab), including the record of 6.8
 - 6.1.6.3 Which standard indicators were not evaluated (species checklist)



- 6.2 Remote interviews with workers and stakeholders for evaluation of social indicators shall be conducted only for farms with the following conditions:
 - 6.2.1 Remote initial and re-certification audits are allowed only in countries indicated as low and medium risk in ASC Country Social Profile in Annex 1.
 - 6.2.2 Remote surveillance audits can be conducted in all countries.
- 6.3 The CAB shall follow these conditions when using ICT for remote auditing:
 - 6.3.1 The communication technology used for interviews is selected and controlled by the CAB and can be made available at the farm site, CH/applicant's office or stakeholder premises. The technology and tools shall allow auditors to confirm interviewee identity. CH/applicant may not record the interview themselves.
 - 6.3.2 Only record data with explicit consent of the interviewees. Afterwards the interviewees will verify and sign a checklist provided by the auditor containing at least the medium, date of recording, a short description and duration of storage of all that was recorded as part of the audit
 - 6.3.3 Record only the data needed for the audit process
 - 6.3.4 Collect and store all data using up-to-date security practices. These measures include access control to the data collected and encrypted transmission of data, for instance when uploading and/or emailing
 - 6.3.5 Not store data beyond a required timeframe. The CAB shall specify how long each recorded file will be kept on the CAB's servers.
 - 6.3.6 When the CAB and/or the certificate holder/ applicant are in doubt over the implementation of these guidelines the General Data Protection Regulation as released by the EU (May 25, 2018, <https://gdpr-info.eu/>) shall be referenced.
- 6.4 Remote audit is not allowed for Group Certification. For further clarification, please contact the ASC directly.
- 6.5 CABs shall specify the date of the closing meeting of the remote/assisted audit. This date will be used for the reporting deadlines specified by the CAR 2.2.
- 6.6 If the travel/ entrance restrictions prevent mandatory check-ups required by certain standard indicators, alternative ways of compliance proof have to be provided by the certificate holder/ applicant. E.g. risk assessments shall be provided by the certificate holder for Salmon 5.1.2.
- 6.7 Open non-conformities, extended in past audits and currently awaiting onsite verification, shall be verified remotely using the tools and guidelines in section 6.3.
- 6.8 For assisted remote audits, the audit team shall coordinate and prepare in advance the work that the on-site auditor will need to conduct on behalf of the remote auditor.



Annex 1: ASC Country Social Profile

ASC Country Social Profile has been created to guide auditors conducting audits of ASC social requirements in countries where ASC farms have been certified so far. It is composed of two sets of indices - external and internal.

The external set is derived from averaging the scores of four internationally recognised indices that are relevant for the seafood sector, namely World Governance Indicators ([WGI](#)), [Trafficking in person](#), Transparency International ([TI](#)), and [Global Slavery Index](#).

The ASC internal index is based on actual social non-conformances reported through ASC farm audits. It is derived from the number of non-conformances over the number of audits carried out in a particular country, regardless of the species. The latest data has been updated as of end March 2019. Planned update is for Q2 2020.

CABs can only conduct remote initial and re-certification audits to applicants in countries listed as low and medium risk. Surveillance remote audits can be conducted in all countries following the requirements of this policy.

ASC Countries	
Country/Territory	Aggregate Country Index
Australia	LOW
Bangladesh	HIGH
Belize	HIGH
Brazil	MEDIUM
Canada	MEDIUM
Chile	MEDIUM
China	HIGH
Colombia	HIGH
Costa Rica	MEDIUM
Denmark	LOW
Ecuador	HIGH
France	LOW
Germany	LOW
Greece	MEDIUM
Guatemala	HIGH
Honduras	HIGH

Iceland	LOW
India	HIGH
Indonesia	HIGH
Ireland	LOW
Italy	LOW
Japan	LOW
Korea, South	MEDIUM
Madagascar	HIGH
Malaysia	HIGH
Mexico	HIGH
Nicaragua	HIGH
Norway	LOW
New Zealand	LOW
Panama	MEDIUM
Peru	MEDIUM
Poland	LOW
South Africa	MEDIUM
Spain	LOW
Tanzania	HIGH
Turkey	MEDIUM



Taiwan, China	MEDIUM
Thailand	MEDIUM
United Kingdom	LOW
United States	MEDIUM
Venezuela	HIGH
Vietnam	HIGH