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# ASC EXIT POLICY FOR AUDITS CONDUCTED UNDER THE ASC COVID-19 POLICY

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## 1. Background

As the COVID 19 Pandemic provoked travel disruptions and bans at a global level, the ASC decided to issue a temporary policy adapting the on-site audits requirements that needed to be conducted during the contingency.

[This policy](#) offered different options based on scenarios. As a manner to assure the integrity of the programme the ASC has decided to implement an extra set of requirements for the Certificate Holders that decided to use one of the exceptions offered in those scenarios. All these requirements are applicable only for the next audit according to the certificate cycle, and have no impact on the outcome of the audit conducted under the COVID policy.

## 2. Reference documents and information

- [ASC Certification and Accreditation Requirements \(CAR v.2.2\)](#)
- Relevant variations/interpretations (links below)
- [ASC published policy](#)



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- [IAF ID 3:2011](#) for Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations (issue 1)
- [IAF MD 4 :2018](#) for the use of information and communication technology for auditing/assessment purposes (issue 2)
- CABs COVID 19 internal policies
- <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/situation-reports>

### 3. Scope

This policy is normative for all ASC audits that according to the certificate cycle will be conducted immediately after an audit that used one of the exceptions offered by the ASC COVID 19 Policy.

Desk review activities can be still conducted remotely for any audit.

All ASC CAR requirements not referenced or related to this policy shall remain applicable.

### 4. List of abbreviations

- CAB - Conformity Assessment Body
- CAR - ASC Certification and Accreditation Requirements
- CH - Certificate Holder
- COVID-19 - New coronavirus disease
- IAF ID - International Accreditation Forum Informative Document
- IAF MD - International Accreditation Forum Mandatory Document
- GDPR - General Data Protection Regulations
- Q&A - ASC Questions and Answers/Interpretations

### 5. ASC auditing scenarios and options

Table 1 below reproduces the different scenarios that the ASC COVID Auditing Policy took into consideration and the possible options that had CABs to continue providing ASC certification services in cases where local authorities, certificate holders (CH) or CABs' policies restricted the auditors' ability to conduct on-site audits (initial, surveillance and re-certification) to avoid the spread of COVID-19.

For each of these options there are different requirements for the immediate following audit. Document review can be done remotely in all scenarios.



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TABLE 1. ASC audits scenarios

Scenarios	Applicability	Options	Exit Requirement
<p><b>5.1 Surveillance Audit (SA)</b></p>	<p>a. 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 <a href="#">Q&amp;A5</a> (± 3 months from the certificate issuance date) and the all standard indicators as described in <a href="#">Q&amp;A45</a></p>	<p><b>Option 1: Postponement</b> Postponement of the audit until the end of the restrictions caused by the outbreak. ASC is waiving the applicability of <a href="#">Q&amp;A5</a>. CAR 17.15.6 remains applicable.</p> <p><b>Option 2: Remote auditing</b> <b>SA1:</b> Remote evaluation of ASC standards indicators which don't need on-site verification. Indicators which need onsite verification can be evaluated in SA2. <b>SA2:</b> For indicators not evaluated in SA 1 that need on-site verification the CAB shall conduct remote auditing following the instructions of <a href="#">IAF MD 4 :2018</a> or follow option 1 or 3.</p> <p><b>Option 3: Assisted remote auditing</b></p>	<p><b>Option 1:</b> The postponed on-site SA has to be conducted within 3 months after the end of the travel restriction in the country where the UoC is located or the country where the auditor (s) are located.</p> <p><b>Options 2 and 3:</b> In case that the SA1 was conducted remotely, the following audit (SA2) shall be conducted on-site. For High risk countries the audit shall include all the standard requirements.</p> <p>In case that the SA2 was conducted remotely, the next audit (recertification audit) shall be on-site and including all the requirements.</p>
<p><b>5.2 Re-certification audit</b></p>	<p>a. All CH with certificates reaching the expiration date.</p>	<p><b>Option 4 Postponement</b> 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. Postpone on-site re-certification audits until the restrictions are lifted.</p>	<p><b>Option 4:</b> If the travel restrictions are still in place after September 30th 2020 in the country where the UoC is located, a remote or assisted remote re-certification audit is allowed in Low and Medium risk countries. In case of a CH located in a High risk country CABs should submit a VR including justification, past</p>



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		<p><b>Option 5 Remote auditing</b> For indicators that need on-site verification the CAB shall conduct remote auditing following the instructions of <a href="#">IAF MD 4 :2018</a> and section 7 of this document or follow option 4 or 6.</p> <p><b>Option 6: Assisted remote auditing</b></p>	<p>performance of the CH, characteristics of the UoC (i.e number of workers), remote audit feasibility and audit methodology proposal. This audit shall include all the standard requirements.</p> <p><b>Option 5:</b> The SA1 audit shall be conducted on-site and it has to include all the standard requirements. It has to be conducted within 3 months prior to the anniversary date of the certificate issuance.</p> <p><b>Option 6:</b> The SA1 audit shall be conducted with environmental and social auditors on-site.</p>
<p><b>5.3. Initial audit</b></p>	<p>a. CHs 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><b>Option 7 Remote auditing</b> For indicators that need on-site verification the CAB shall conduct remote auditing following the instructions of <a href="#">IAF MD 4 :2018</a> or follow option 8.</p> <p><b>Option 8: Assisted remote auditing</b></p> <p><b>Note:</b> For indicators which need the collection of samples or visits to the farms by third parties this is restricted by applicant or third party policies, the CAB shall use as reference of compliance the last audit</p>	<p><b>Option 7:</b> The SA1 audit shall be conducted on-site and it has to include all the standard requirements. It has to be conducted within 3 months prior to the anniversary date of the certificate issuance.</p> <p><b>Option 8:</b> The SA1 audit shall be conducted environmental and social auditors on-site.</p>



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		results from the other farms managed by the organization in combination with historical data of applicant site .	
	b. CHs managing other ASC certified sites and applying for certification for a new site running its first production cycle.	An on-site audit is required. If it is not currently allowed by the travel restrictions, it would need to be postponed. Remote or assisted remote auditing is not permitted.	
	c. CHs managing no ASC certified sites applying for certification for either a new site or site that has been in operation for more than one complete production cycle	An on-site audit is required. If it is not currently allowed by the travel restrictions, it would need to be postponed. Remote or assisted remote auditing is not permitted.	
<b>5.4 Certificate transfer</b>	a. Either a CAB is no longer permitted to deliver ASC farm certification services or a farm 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>	



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## 6. Other Requirements

- 6.1 CABs shall keep a list of all audits affected by the COVID 19 policy. They have to submit Annex 2 of this document to the ASC ([certification@asc-aqua.org](mailto:certification@asc-aqua.org)) and ASI by **August 1<sup>st</sup> 2020**. This list has to be updated once per month until they do not have more audits conducted under the COVID policy.
- 6.2 CABs shall keep and submit with the audit announcement of the audit affected by this policy and/ or by request proof of date of beginning and end of the travel bans using external official sources.

### 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



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Canada	<b>MEDIUM</b>
Chile	<b>MEDIUM</b>
China	<b>HIGH</b>
Colombia	<b>HIGH</b>
Costa Rica	<b>MEDIUM</b>
Denmark	<b>LOW</b>
Ecuador	<b>HIGH</b>
France	<b>LOW</b>
Germany	<b>LOW</b>
Greece	<b>MEDIUM</b>
Guatemala	<b>HIGH</b>
Honduras	<b>HIGH</b>
Iceland	<b>LOW</b>
India	<b>HIGH</b>
Indonesia	<b>HIGH</b>
Ireland	<b>LOW</b>
Italy	<b>LOW</b>
Japan	<b>LOW</b>
Korea, South	<b>MEDIUM</b>
Madagascar	<b>HIGH</b>
Malaysia	<b>HIGH</b>
Mexico	<b>HIGH</b>
Nicaragua	<b>HIGH</b>
Norway	<b>LOW</b>
New Zealand	<b>LOW</b>
Panama	<b>MEDIUM</b>
Peru	<b>MEDIUM</b>
Poland	<b>LOW</b>
South Africa	<b>MEDIUM</b>
Spain	<b>LOW</b>
Tanzania	<b>HIGH</b>
Turkey	<b>MEDIUM</b>
Taiwan, China	<b>MEDIUM</b>
Thailand	<b>MEDIUM</b>
United Kingdom	<b>LOW</b>
United States	<b>MEDIUM</b>
Venezuela	<b>HIGH</b>
Vietnam	<b>HIGH</b>



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## **Annex 2:List of Audits conducted under the ASC COVID 19 Policy**

Separate Excel File