



# ASC POLICY FOR AUDITS DURING THE COVID-19 OUTBREAK

VERSION SEPTEMBER 18<sup>TH</sup> 2020

Publication date: July 31<sup>st</sup> 2020

Applicability Date: October 1<sup>st</sup> 2020

Valid until further notice

Additions to the previous version of this document are highlighted in yellow

Reminder: This policy only applies on audits affected by official travel restrictions caused by the COVID 19 pandemic.

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### 1. Background

The following policy set the requirements for CABs and ASC Certificate Holders to maintain the ASC certification when on-site audits are affected by restrictions caused by the global COVID-19 pandemic.

The impacts of travel restrictions may be eased by remote and/or assisted remote audits 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)
- [WHO](#) situation report and advice
- [ISO 9001 Auditing Practices Group Guidance on remote audits](#)

### 3. Scope

- 3.1 This policy is normative for all ASC audits that will be conducted during the COVID-19 outbreak in locations where travel or quarantine restrictions apply.
- 3.2 All ASC CAR requirements not referenced or related to this policy shall remain applicable.
- 3.3 This policy is also applicable when the auditors are based in a location that is affected by travel restrictions and are the only qualified resource that the CABs have. If the CAB has qualified local auditors able to be on-site in the UoC, the CAB shall prioritize local resources for audits complying with ISO 17065 clause 6.1.1.1. CABs shall keep updated lists of their auditors and the locations where they are based that can be requested by ASC and/ or ASI.
- 3.4 To preserve the health and safety of auditors is the CABs responsibility. The personal health conditions of auditors which put them in a COVID vulnerable group shall have no effect on the applicability of this policy.

### 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.

4.13 Official Travel restriction: All guidance, determination or legislation that has been issued by a national, regional or local authority that impedes the normal and free movement of people in that region based on the risks of the COVID-19 pandemic.

This also includes but it is not limited to:

- a) Mandatory quarantines (i.e. 14 day quarantine at arrival) in the country/ region where the Unit of Certification or the auditor(s) are located, and
- b) Official recommendations in the country/region where the UoC is located limiting traveling only for essential purposes.

## 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 an official travel restriction affects 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 affecting the audit (i.e. availability of local audit teams) the CAB shall conduct audits as usual, following the applicable CAR requirements and available interpretation



**TABLE 1. ASC audits scenarios**

Scenarios	Applicability	CAB
<p><b>5.1 Surveillance Audit (SA)</b></p>	<p>1. All surveillance audits scheduled for the validity period of this Policy, according to the window of opportunity defined by <a href="#">Q&amp;A5</a> (<math>\pm</math> 3 months from the certificate issuance date) and the all standard indicators as described in <a href="#">Q&amp;A 45</a></p>	<p><b>Option 1: Postponement</b> Not available. Audits that have been previously postponed have to be conducted. The audit announcements for these audits have to be submitted before September 30<sup>th</sup> 2020. If an on-site audit is still not possible, CABs have to choose between Option 2 and 3.</p> <p><b>Option 2: Remote audit</b></p> <p><b>SA1:</b> 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><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 3.</p> <p><b>Option 3: Assisted remote audit</b></p> <p>If option 2 and 3 are not possible, the certificate shall be cancelled by the end of the window of opportunity.</p>
<p><b>5.2 Re-certification audit</b></p>	<p>1. All CH with certificates reaching the expiration date.</p>	<p><b>Option 4: Postponement</b> Not available. Certificates can only be extended for 3 months according to ASC CAR 17.17</p> <p><b>Option 5: Remote audit</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 6.</p> <p><b>Option 6: Assisted remote audit</b></p> <p>If option 5 and 6 are not possible, the certificate will expire and the recertification audit has to be conducted when the restrictions are over or options 5 or 6 are feasible.</p>
<p><b>5.3. Initial audit</b></p>	<p>1. Applicants already</p>	<p><b>Option 7: Remote audit</b></p>



	<p>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>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 audit</b></p> <p><b>Note:</b> 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 been in operation for more than one complete 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><b>5.4 Certificate transfer</b></p>	<p>1. Either a CAB is no longer permitted to deliver ASC farm certification services or a CH decides to change CABs</p>	<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.
- a) In case that the internal policy of the client is not allowing on-site visits but there is not an official external restriction, the CAB can offer an assisted remote audit (just one auditor on-site) assuring that all the COVID 19 internal policies will be followed by the auditor.  
If the Certificate Holder does not accept the assisted remote audit and the window of opportunity for the surveillance audit is expired, the certificate has to be cancelled.  
In the case of initial or recertification audit, without an official travel ban in place, the audit shall be conducted with at least one auditor on site for low and medium risk countries, and a social and environmental auditor on-site for high risk countries.
  - b) The client's internal COVID 19 policy has to be submitted together with the audit announcement. To be considered, the policy has to ban the entrance of all external visitors to the premises, not only auditors.
- 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 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 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.
- 6.2.3 Remote recertification audits can be conducted in all countries from the publication date of this policy
- 6.2.3.1 In the case of remote and remote assisted recertification audits in High risks countries:
- a) The CAB shall conduct a feasibility and risk analysis for remote audits according to ISO 9001 Auditing Practices Group Guidance on remote audits.
  - b) Synchronous / live audit of facilities and operations shall be available.
  - c) The audit announcement shall specify the dates and elements that will be remotely audited in a synchronous way. **If synchronic communication is not possible during the majority (80% of the time) of the full remote audit time, then a remote audit is not authorized and the audit has to be cancelled until the communication is improved or an onsite audit is possible**
  - d) CABs shall take into consideration additional measures that assure workers confidentiality during interviews.
- 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.
- 6.9 If the CAB and the client agree, a CAB facilitator (not ASC auditor) can be used on site to help the auditor in an assisted remote audit. This facilitator shall only follow live instructions of the auditor and cannot in any case replace the auditor in conducting evaluations or compliance conclusions. When using a facilitator, the communication with the remote auditor shall be synchronic at least during 80% of the audit time.
- 6.10 If a travel restriction continues affecting an audit of a certificate holder that already had a remote audit, this policy continues applying for that second audit.
- 6.11 Remote audits can be witnessed by CAB's lead auditor as part of the requirements to keep auditors' qualifications (ASC CAR v2.1 B18), but they cannot be considered for the sign off of new auditors.





## 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.

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