

COVID-19 MarinTrust Programme Policy

VERSION 1.1 29 July2020

This Policy supersedes and replaces our earlier notifications of 07 April 2020.

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

This Policy will be reviewed on a monthly basis, and amended where applicable, due to the fast-changing nature of this extraordinary event. Accreditation Bodies and Certification Bodies (CBs) shall ensure that they are using the most up-to-date guidance and requirements.

Background

The MarinTrust programme has declared that, following the guidance of IAF (International Accreditation Forum) **Document ID 3:2011** “Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organisations”, it has invoked its **Process on Handling Remote MarinTrust Factory and MarinTrust Chain of Custody Audits during Extraordinary Events of Circumstances with immediate effect due the COVID-19 outbreak.**

Scope

This policy is normative for all MarinTrust audits.

All other normative requirements *not* related to the new policy remain applicable.

Certification suspensions **may not** be lifted using a remote audit

MarinTrust Auditing Options and Scenarios

MarinTrust has agreed that for all MarinTrust audits to either its Factory Standard or its Chain of Custody (CoC) Standard the following requirements shall be followed by its approved CBs.

1. For all **new applicants** to the MarinTrust programme these shall be processed and made audit ready until the CB can execute the audit on-site following the agreed certification procedures and requirements. All new applications to either standard shall have their on-site audit postponed until the travel restrictions for the relevant location have been relaxed sufficiently to allow an approved auditor to conduct an on-site audit at these new facilities in a manner that is not imposing any COVID-19 related safety issues to the auditor or the applicant. CBs will be expected to arrange on-site audits as soon as possible after relevant restrictions are lifted. MarinTrust will make a note alongside the applicant certificate on the website that the audit was carried out remotely.
2. All **recertification applicants** to either the MarinTrust Factory Standard or MarinTrust Chain of Custody Standard whose certification is due to expire within the validity date of this policy, shall have their current certificate extended by a period of up to 6 months by their CB

from the date of certificate expiry. If an on-site audit cannot be completed within this time, the CB shall submit a remote audit request to MarinTrust.

3. All certified sites shall be required to have the **annual surveillance audit** to maintain the continuity of their certificate for either the MarinTrust Factory Standard or the MarinTrust CoC Standard. Where an on-site audit is not possible in affected areas¹, MarinTrust will permit a **four (4) month extension** to complete this audit after the original 12 month due date. This is to allow for more time for CBs to conduct an on-site audit as the default requirement. If an on-site audit is not possible after granting such an extension, the audit shall be carried out remotely using the Process on Handling Remote MarinTrust Factory and MarinTrust Chain of Custody Audits² during Extraordinary Events and Circumstances and associated checklists. Where an on-site audit was not possible and the MarinTrust Remote Audit Procedure has been carried out, the site shall undergo an on-site audit within 6 months of the remote audit date.

The remote audit does not 'replace' a full onsite audit. The remote audit is acting as a holding place for the certificate holder until an on-site audit can be done. This onsite audit must be carried out within 6 months of the remote audit being conducted.

Certificate holders may apply to a CB to unilaterally cancel/postponed on-site audits due to Covid-19 concerns, however evidence and justification must be provided in order to sufficiently substantiate the cancellation or postponement. This evidence and justification will be kept in the certification file by the CB.

Section 3.1 and Section 3.2 of the MarinTrust Standard

GMP+ Certification:

For certified MarinTrust sites that:

- a) use an approved MarinTrust GMP standard as evidence to meet the requirements in section 3.1 of the MarinTrust Factory Standard, and
- b) the validity of this GMP certification has also been affected by Covid-19 pandemic.

These sites shall be contacted directly by their CB to determine the most appropriate course of action based on their individual circumstances which shall be agreed with the MarinTrust Secretariat before proceeding.

FEMAS certification:

For certified MarinTrust sites that:

¹ "Affected areas" are considered those countries, provinces, territories or cities experiencing ongoing transmission of COVID-19, in contrast to areas reporting only imported cases."

https://www.who.int/ith/2019nCoV_advice_for_international_traffic_rev/en/

² 'MarinTrust Remote Audit Procedure' for short.

- a) use an approved MarinTrust FEMAS standard as evidence to meet the requirements in section 3.1 of the MarinTrust Factory Standard, and
- b) this FEMAS certification has also been affected by Covid-19 pandemic,

These sites shall be contacted directly by their CB to determine the most appropriate course of action based on their individual circumstances which shall be agreed with the MarinTrust Secretariat before proceeding.

Section 3.2 of the MarinTrust Standard

For certified MarinTrust sites that do not hold valid GMP+ or FEMAS and use compliance to criteria in section 3.2 of the MarinTrust standard, the auditing options and scenarios outlined in this document are to be followed by the CB.

Reporting

CBs shall report to MarinTrust on a monthly basis detailing how COVID has or is impacting audits for facilities. The reporting shall be in excel format and include information on all MarinTrust certification and include, as a minimum, the following information:

- Company name (and plant name)
- Certificate number
- Country
- Allocated auditor
- COVID impact (full description)
- Audit type
- Audit due date
- Audit conducted date (if applicable)
- New audit proposed date (if applicable)

Certificate Validity

The validity of certificates is retained during any lengthened recertification process. However, at the end of the extraordinary circumstances, the 3-year certification cycle will revert to its original schedule.

Thanks

MarinTrust at this time would like to thank accredited certification bodies, MarinTrust certified sites and key stakeholders for their patience and continued support of the programme.

Further Information

For further details, or if further clarification is required, please contact standards@marin-trust.com.