

Process on Handling Remote MarinTrust Factory and MarinTrust Chain of Custody Audits during Extraordinary Events or Circumstances

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The following procedure is based on IAF (International Accreditation Forum) Document IAF ID 3:2011

In a normal business environment, every organisation is continuously exposed to opportunities, challenges, and risks. However, extraordinary events or circumstance beyond the control of the organisation happen. In such circumstances, Accreditation Bodies (ABs) and Certification Bodies (CBs) should have a process for the proper maintenance of accreditation and certification in accordance with the guidelines outlined in this document.

It is important for a CB to be able:

- to demonstrate reasonable due diligence, mutual understanding, and trust and;
- to establish an appropriate course of action in response to extraordinary events.

The objective of this document is to provide ABs and CBs associated with the MarinTrust programme guidance on the appropriate course of action.

Definition: Extraordinary event or circumstance (IAF)

A circumstance beyond the control of the organisation, 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.

Extraordinary events or circumstances affecting a MarinTrust certified site may temporarily prevent the CB from carrying out planned MarinTrust audits onsite.

When such a situation occurs, CBs and the MarinTrust Secretariat will plan a course of action to maintain the integrity of the MarinTrust programme whilst causing as little disruption to certification status and validity as possible.

The CB, with guidance from the MarinTrust Secretariat, will need to weigh the risks of continuing certification and establish a documented policy and process, outlining the steps it will take when a certified site is affected by an extraordinary event.



Definition: Remote Audit

A remote audit is an audit of an applicant or certificate holder conducted by a CB, that does not take place at the physical location of the applicant or certificate holder, generally using information and communication technology (ICT).

MarinTrust Extraordinary Event Procedure

The CB in the first instance, shall gather necessary information from the applicant or certified site to assess risk for auditing and certification and understand the certified site's current and expected future situation. When assessing a facility's risk prior to undertaking a remote audit, the CB should use MarinTrust's procedure entitled '*Risk assessment to be conducted by CBs prior to undertaking remote audits on facilities currently certified to the MarinTrust standards*'. This procedure also provides guidance on the conditions of the remote audit for each MarinTrust certified facility depending on the risk assessment outcome.

The CB shall then, if appropriate complete a Remote Audit Request, and submit to the MarinTrust Secretariat to determine an appropriate course of action.

The information collected by the CB should include the following as appropriate:

- What is known about when the site will be able to function normally?
- What is known about when the site will be able to ship products or perform the service defined within the current scope of the MarinTrust certification?
- Will the certificate holder need to use alternative processing and/or distribution sites?
- To what extent has the certificate holder's management system been affected?

Using this information, MarinTrust shall determine the risk of continuing certification and decide with the CB whether a remote audit or alternative short-term methods of assessment could be used to verify continuing system effectiveness for the certified organisation.

The following options will be considered;

1. 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 onsite audit is not possible in affected areas¹, the CB shall conduct a Risk Assessment and follow guidance in table 1.
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 onsite audit cannot be completed within this time, the CB shall conduct a Risk Assessment and follow guidance in table 1.

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/emergencies/diseases/novel-coronavirus-2019/travel-advice>

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- For all **new applicants** to the MarinTrust programme, these shall be processed and made audit ready until the CB can execute the audit onsite following the agreed certification procedures and requirements.

NOTE- If MarinTrust certification is a requirement for supply, the MarinTrust secretariat shall produce a letter for the potential applicant that their application has been approved and they are waiting for their certification audit to be completed which has been delayed by the extraordinary event.

Table 1 Remote audit requirements for CBs to follow depending on the final risk categorisation.

		Audit type	
		Surveillance	Re-certification
Risk	Low	<ul style="list-style-type: none"> Audit(s) can be conducted remotely, with video technology with an interactive capability. If 2 consecutive surveillance audits have been conducted remotely, the next recertification audit will be required to be onsite. 	<ul style="list-style-type: none"> Audit(s) can be conducted remotely, with video technology with an interactive capability if only the 1 previous surveillance audit was conducted remotely. The next audit will be required to be onsite to verify MarinTrust clause requirements that cannot be verified (or only partially verified) remotely. Where the 2 previous surveillance audits were conducted remotely, the recertification audit must be onsite.
	Medium	<ul style="list-style-type: none"> Audit can be conducted remotely if the previous audit was conducted onsite. However, <ul style="list-style-type: none"> - an onsite audit must be conducted within 6-months to provide assurance that clause requirements not able to be assessed (or only partially verified) remotely are fully complied with. - If during the remote audit it was possible to fully verify all clauses of the relevant standard the following onsite audit shall follow the normal 	<ul style="list-style-type: none"> Audit can be conducted remotely if the previous audit was conducted onsite. However, <ul style="list-style-type: none"> - an onsite audit must be conducted within 6-months to provide assurance that clause requirements not able to be assessed (or only partially verified) remotely are fully complied with. - If during the remote audit it was possible to fully verify all clauses of the relevant standard the following onsite audit shall follow the normal audit

		<p>audit frequency of 12 months and must be conducted onsite.</p> <ul style="list-style-type: none"> Where the previous audit was conducted remotely, a second remote audit may be conducted remotely provided the video technology used at the previous audit allowed all criteria to be assessed fully. The next audit shall be conducted onsite within 12 months. 	<p>frequency of 12 months and must be conducted onsite.</p> <ul style="list-style-type: none"> Where the previous audit was conducted remotely, a second remote audit may be conducted remotely provided the video technology used at the previous audit allowed all criteria to be assessed fully. The next audit shall be conducted onsite within 12 months.
	High	<p>Audit cannot be undertaken remotely, however, the CB may contact MarinTrust secretariat directly to discuss options if applicable.</p>	<p>Audit cannot be undertaken remotely, however, the CB may contact MarinTrust secretariat directly to discuss options if applicable.</p>

Subcontracted Facilities

All subcontracted facilities with an audit history under MarinTrust shall qualify for remote audit unless the main facility for certification is high risk.

Subcontracted facilities must be included in the remote audit request form submitted to MarinTrust for prior approval in order to undergo remote audits.

Subcontracting facilities with no previous audit history under the MarinTrust Programme will not be permitted to undergo remote audits. These shall constitute as a 'new subcontracting facility' and must undergo an onsite audit.

Information to MarinTrust

All deviations from the established certification program should be justified, documented, and made available to MarinTrust upon request.

Remote Auditing Decision Mechanism

In advance of arranging and conducting a Remote Audit procedure, the CB shall inform the MarinTrust Secretariat and shall submit a Remote Audit Request. MarinTrust shall require documented evidence that an extraordinary event is or has occurred in line with the Conditions for the use of Remote Auditing. This will allow a decision to be made on a case-by-case basis or by entire country or geographical region.

Remote Audit Requests shall be sent to the MarinTrust Secretariat at least 1 calendar month prior to the scheduled remote audit request date. This is to allow for sufficient time for full review and approval of the remote audit request, and ensure the assigned auditor has sufficient time to carry out robust pre-audit planning as outlined in the further guidance herein.

Conditions for use of Remote Auditing

The following conditions shall be in place before a remote audit option can be triggered:

- Official Travel bans are in place to travel to and/or within an affected country and or geographical region which prevent an auditor from conducting an onsite audit. And/or:
- The applicant has been subject to an extraordinary event or circumstance that has prevented them from allowing an external auditor to visit their site or sites.

Note: certification suspensions may not be lifted using a remote audit

The following requirements shall be complied with once MarinTrust and the CB have agreed that a remote audit can be used to assess an applicant or certificate holder. These follow IAF MD 4:2018 guidance on how to use Information and Communication Technology (ICT) for auditing and assessment purposes. CBs shall follow all the requirements in IAF MD 4 :2018 and the requirements of this document.

Requirements

1 Security and Confidentiality

- The security and confidentiality of electronic or electronically transmitted information is particularly important when using ICT for audit purposes. A mutual agreement concerning security and confidentiality between the applicant and the CB shall be in place.

2 Process

- Facilities must have been in operation for a minimum of 2 working weeks and have some production available in order to conduct a robust remote audit.
- The CB should use MarinTrust’s procedure entitled ‘*Risk assessment to be conducted by CBs prior to undertaking remote audits on facilities currently certified to the MarinTrust standards*’ to determine the facility’s risk, prior to any remote audit being undertaken.
- The CB, considering the risks and opportunities in the audit plan, shall identify how ICT will be utilised and the extent to which ICT will be used for audit purposes to optimize audit effectiveness and efficiency while maintaining the integrity of the audit process.
- The CB shall check that the applicant has the necessary infrastructure to support the use of the ICT proposed.
- When using ICT, auditors shall have the competency and ability to understand and utilise the information and communication technologies employed to achieve the desired results of audit(s).
- The auditor shall be aware of the risks and opportunities of the ICT used and the impacts this may have on the validity and objectivity of the information gathered.
- All audit reports and related records shall indicate the extent to which ICT has been used in carrying the out audit and the effectiveness of ICT in achieving the audit objectives.

Further Guidance

- Remote audits shall have the same objectives as onsite audits.
- Use a webcam and ask certificate holder or applicant personnel to do the same. This shows body language and facial expressions that may give clues but note that it is more difficult to read people’s reactions during a remote assessment.
- Concentration levels may be affected – adjust accordingly and use a headset and quiet environment to reduce background noise.
- The internet allows the possibility to validate and cross check certain information with online sources.
- The duration of a remote audit should be equal to an onsite audit, but preparation for a remote audit may require more time than for onsite.

Prior to a remote audit a CB should:

- Request the same documents as normally for an onsite audit, or consider requesting more documents than normally, such as specific records and database screenshots.
- Where Non-conformances were raised at the previous annual audit, the auditor shall ask for relevant evidence prior to the remote audit and shall be note these to be included as key areas of focus during the remote audit to ensure full, in-depth verification.
- Verify whether and when applicant or certificate holder personnel are available. Be prepared to amend timings to accommodate the applicant or certificate holder.
- Confirm a remote audit agenda with the applicant or certificate holder, and ask for explicit agreement on the items, including timings and availability. State when communicating with the applicant or certificate holder that regular breaks will take place.

- Together with the applicant or certificate holder, decide on the best approach to conduct the remote audit (i.e. full day or split across several days).
- Agree with the applicant or certificate holder, where appropriate, on conference software for hosting the audit, and schedule a test well in advance – this test should also be used to get agreement on the preferred way of conducting the audit, the availability of personnel, etc.
- Ensure auditor/s have sufficient training and/or experience to not only use the ICT successfully but to adjust to the extra challenges of ensuring a credible audit in the circumstances.
- Aim to schedule audits so that translators or interpreters are not required. If a translator or interpreter is needed never rely on translation/interpretation provided by the applicant or certificate holder. Translators or interpreters should dial in and use a chat function in the conference software, providing “private” translation/interpretation in the chat function as opposed to translating/interpreting in the public chat.
- Schedule a meeting with a chosen translator or interpreter, where appropriate, to go through the points above before the audit.

During a remote audit a CB should:

- Apply common-sense ISO 19011 auditing practices (e.g. introduce the entire Audit team, including observers).
- Confirm all attendees’ names and job titles during the meeting and request that they all log in to the selected conference software.
- Document clearly which records, and documents could not be accessed during the audit – and why - so that these can be reviewed later, e.g. at the next onsite audit.
- Make best efforts to paraphrase and confirm what was heard, stated and read.
- Not take screenshots or record meetings without permission.
- Be mindful that there may be a higher rate of misunderstanding especially when the applicant’s or certificate holder’s first language is not the same as the auditor’s.
- Ask for the closing meeting to be postponed if there is not enough time to review evidence during the time allocated.

MarinTrust Remote Audit Procedure

When MarinTrust invokes the Extraordinary Event or Circumstance Process and remote Audit Procedure, MarinTrust expect a CB conducting a remote audit to follow this procedure where applicable, or as otherwise directed by MarinTrust.

MarinTrust has developed a remote audit checklist for both the current MarinTrust Factory Standard and the current MarinTrust CoC Standard.

Remote audit, auditor requirements

An auditor that will conduct remote audits under the MarinTrust programme will, as a minimum, meet the following requirements;

- Be an approved auditor to conduct audits against the MarinTrust standard in line with appendix B3 of the Control Manual
- Have conducted at least 2 onsite audits to the relevant standard
- Attended training on how to conduct remote audits in line with MarinTrust procedures and requirements.

Planning the audit

A remote audit shall be scheduled for a specific date and time with confirmation that on that day the relevant people will be available to participate by video conference or telephone and will have online capabilities to email information as requested. The CB must comply with requirements and consider guidance on how to use Information and Communication Technology (ICT) for auditing and assessment purposes.

The CB shall ensure that a translator or interpreter is present if required to overcome any possible language barriers.

Remote audits shall be arranged to cover all sites on a certificate, including the subcontractors.

Preparation for the Audit

The auditor shall review the certificate holder's last audit, to determine:

- The scope of the remote audit –Factory, or CoC, what sub-contractors are used (if any), third party certifications, etc.
- For Factory audits:
 - what approved fisheries/by-product fisheries/aquaculture are used.
 - does the factory require a full audit to complete section 3.2, or a streamlined version if a GMP+ or FMEAS certificate is in place for section 3.1.
- For CoC audits:
 - supplying factories, process flow and products.

- The facility's risk according to the MarinTrust procedure entitled 'Risk assessment to be conducted by CBs prior to undertaking remote audits on facilities currently certified to the MarinTrust standards'.

The auditor shall ask for the following information in advance of the remote audit:

For the MarinTrust Factory Standard:

- a current copy of an MarinTrust recognised GMP+ certificate (if claiming GMP+, FEMAS or PAC certification), and
- one traceback with accompanying documentary evidence for each of their approved sources e.g., one for each whole fish that is approved to MarinTrust, one for a by-product that is approved to MarinTrust

For the MarinTrust CoC Standard:

- one traceback with accompanying documentary evidence for each category of MarinTrust compliant product (fishmeal and/or fish oil)

The CB shall ensure **the facility** to be audited has remote sharing capabilities and a staff available to liaise with the auditor through the whole course of the audit.

An agreement shall be in place between the certified site or applicant and the CB for the use of ICT information to ensure that all such information is kept secure and confidential.

NOTE- If the factory needs to hold a current GMP+, FEMAS or PAC certificate to meet the requirements of section 3.1 within the MarinTrust Factory Standard and this has lapsed this shall be treated as a non-conformance, unless the GMP+, FEMAS or PAC standard program is also affected by the same extraordinary event. In which case the auditor shall inform the CB to discuss the next appropriate steps with the MarinTrust Secretariat.

Conducting the audit

Opening meetings, closing meetings and interviews should be conducted by video conference or where not available and appropriate, by telephone. The auditor shall use the approved MarinTrust Factory or CoC Audit Checklists which will be provided by MarinTrust to all CBs approved to certify against the programme.

The relevant documents and records required for the pre-audit tracebacks with accompanying documentary evidence shall be provided in advance by email. Other documents required to show compliance with the intent of each MarinTrust clause shall be reviewed and audited through sharing the screen in an online call (e.g. showing an internal production records etc.). Other technologies may be used where available and appropriate.

There are various ways in which independence in sampling can be assured. These are outlined in the Remote Audit Checklists for the MarinTrust Standards. These may include:

- Selecting people to interview based on an organisation chart and with video interviews.
- Conducting the record-verification exercises of the auditor's choice, following their review of the tracebacks.

Reporting on the audit

The MarinTrust checklists shall be annotated so show that this was remote audit and where the applicant is in full conformance or not. The Auditor shall determine if the non-conformance is a Critical, Major or Minor as determined within the MarinTrust programme, to comply with Appendix 4 of the Control Manual.

NOTE- This Remote audit procedure is not applicable for use on new applications to the MarinTrust programme unless the CB is specifically instructed to do so by the MarinTrust Secretariat.

In addition, CBs shall report to MarinTrust on a monthly basis, unless otherwise stated, detailing how the extraordinary event 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
- Extraordinary event impact (full description)
- Audit type
- Audit due date
- Audit conducted date (if applicable)
- New audit proposed date (if applicable)

Further Guidance

Please also refer to **ISO 19011:2018** for further guidance on auditing virtual or remote locations.

Amendment Log

DATE	ISSUE	AMENDMENT	AUTHORISED BY
1.3	31/03/2021	Addition of Risk Assessment guidance to first paragraph of 'MarinTrust Extraordinary Event Procedure, page 2, and reference to tale 1 in points 1 and 2.	Libby Woodhatch
1.3	31/03/2021	Addition of table 1 page 3.	Libby Woodhatch
1.3	31/03/2021	Addition of 2 nd bullet point in requirements, 2. Process, to provide further guidance on Risk Assessment that must be used by CBs.	Libby Woodhatch
1.3	31/03/2021	Addition of further guidance on Risk Assessment requirements in 'Preparation for the Audit' section, third bullet point.	Libby Woodhatch
1.3	31/03/2021	Inclusion of recognised PAC certification in 'Preparation for the Audit' section, For the MarinTrust Factory Standard, first bullet point and notes, page 8.	Libby Woodhatch
1.4	19/04/2021	Removal of 4-month extension window requirement for surveillance audits to qualify for remote auditing in point 1, page 3.	Libby Woodhatch
1.4	19/04/2021	Addition of further guidance to remote auditing options and scenarios in table 1 for the allowance of consecutive remote audits in table 1, page 4.	Libby Woodhatch
1.4	19/04/2021	Addition of guidance for remote auditing of subcontracting facilities in the 'MarinTrust Extraordinary Event Procedure' section on page 5.	Libby Woodhatch
1.4	19/04/2021	Addition of wording ' <i>Remote Audit Requests shall be sent to the MarinTrust Secretariat at least 1 calendar month prior to the scheduled remote audit request date. This is to allow for sufficient time for full review and approval of the</i>	Libby Woodhatch

