

# COVID-19 MarinTrust Programme Policy

VERSION 3.0 25 July 2022

This Policy supersedes and replaces our earlier notifications of version 2.0 issued February 2022

This Policy is valid only for the current COVID19 pandemic where travel restrictions remain in place in affected countries under **the local legislation** in which the facilities are situated.

**Note:** Individual company policies of COVID restrictions shall not be accepted.

This Policy will be reviewed and amended where applicable in accordance with the changing nature of the pandemic. Accreditation Bodies and Certification Bodies (CBs) shall ensure that they are using the most up-to-date guidance and requirements.

## Background

The MarinTrust programme 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 invoked its **Process on Handling Remote and Enhanced Remote 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 in line with the validity of this Policy. See details for options and scenarios.

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

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

## MarinTrust Auditing Options and Scenarios

MarinTrust has agreed that for MarinTrust audits to either its Factory Standard or its Chain of Custody (CoC) Standard in line with the validity of this Policy, the following requirements shall be followed by its approved CBs.

Prior to any remote or enhanced remote audit being undertaken the CB shall use MarinTrust's procedure entitled '*Risk assessment to be conducted by CBs prior to undertaking remote and enhanced remote audits on facilities undergoing Certification to the MarinTrust programme*', to determine the conditions of the remote or enhanced remote audit for each facility in line with the allocated risk assessment level.

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 line with the validity of this Policy, 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. Where an onsite audit cannot be completed within this time, in line with the validity of this Policy, the CB shall conduct a Risk Assessment and follow guidance in table 1.
3. All **new applicants** to the MarinTrust programme will be deemed high risk and will be required to undergo the audit onsite. These shall be processed and made audit ready until the CB can execute the audit onsite following the agreed certification procedures and requirements.

Where an onsite audit is not possible, in line with the validity of this Policy, new facilities to the MarinTrust Programme, who therefore have no previous certification history, may be offered an enhanced remote audit option. The CB shall follow guidance on Enhanced Remote Audits *within Enhanced Remote Audit Guidance* addendum document and the *Process on Handling Remote and Enhanced Remote Factory and MarinTrust Chain of Custody Audits during Extraordinary Events of Circumstance*.

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

		Audit type	
		Surveillance	Re-certification
<b>Risk</b>	Low	<ul style="list-style-type: none"> <li>Audit(s) can be conducted remotely, with video technology with an interactive capability.</li> <li>If 2 consecutive surveillance audits have been conducted remotely, the next recertification audit will be required to be onsite.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>Where the 2 previous surveillance audits were conducted remotely, the recertification audit must be onsite.</li> </ul>
	Medium	<ul style="list-style-type: none"> <li>Audit can be conducted remotely if the previous audit was conducted onsite. However,               <ul style="list-style-type: none"> <li>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.</li> <li>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 frequency of 12 months and must be conducted onsite.</li> </ul> </li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Audit can be conducted remotely if the previous audit was conducted onsite. However,               <ul style="list-style-type: none"> <li>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.</li> <li>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 frequency of 12 months and must be conducted onsite.</li> </ul> </li> <li>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.</li> </ul>
	High	<p>Audit <b>cannot</b> be undertaken remotely, however, the CB may contact MarinTrust secretariat directly to discuss options if applicable. An <b>enhanced</b> remote audit may be offered.</p>	<p>Audit <b>cannot</b> be undertaken remotely, however, the CB may contact MarinTrust secretariat directly to discuss options if applicable. An <b>enhanced</b> remote audit may be offered.</p>

MarinTrust will make a note alongside the applicant certificate on the website that the audit was carried out remotely.

Certificate holders may apply to a CB to unilaterally to cancel/postpone onsite audits in line with the validity Policy and option and scenarios outlined and must provide strong evidence and justification to sufficiently substantiate the cancelation or postponement. This evidence and justification will be kept in the certification file by the CB.

### **Unannounced audits**

At all stages throughout the auditing process MarinTrust will allow the CB the right to undertake additional ad-hoc and/or unannounced audits if the CB feels additional verification of a particular facility is required to ensure that the intent of the MarinTrust standards are being maintained. To trigger one of these unannounced audits the CB shall inform the MarinTrust Secretariat with their reasons for requiring the use of this additional verification mechanism and this must be conducted within 6 months of the remote or enhanced remote onsite audit.

### **Subcontracted Facilities**

All subcontracted facilities may undergo remote audit.

Subcontracted facilities must be included in the remote and enhanced remote audit request form submitted to MarinTrust for approval prior to undergoing a remote audit.

Subcontracted facilities that already hold MarinTrust Chain of Custody Certification will not be required to be audited in full, on a remote basis, under the scope of the main facility.

For subcontracting facilities associated with new applicants, please refer to the Enhanced Remote Audit Section within this document.

## 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:

- a) use an approved MarinTrust FEMAS standard as evidence to meet the requirements in section 3.1 of the MarinTrust Factory Standard, and
- b) the validity of 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.

### **PAC Certification**

For certified MarinTrust sites that:

- a) use an approved MarinTrust PAC standard as evidence to meet the requirements in section 3.1 of the MarinTrust Factory Standard, and
- b) the validity of this PAC 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+, FEMAS or PAC certification 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. Therefore, where the validity of the certificate has been retained during a lengthened recertification process the facility must undergo the required x2 surveillance and recertification audits within the 3-year certification cycle. This may result in audits being schedule prior to the 12-month audit frequency.

## 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](mailto:standards@marin-trust.com).

## Amendment Log

DATE	ISSUE	AMENDMENT	AUTHORISED BY
1.3	31/03/2021	Update of versions and validity dates of policy.	Libby Woodhatch
1.3	31/03/2021	Addition of further guidance for the final risk categorisation for 'medium risk' in MarinTrust Option and Scenarios, table 1	Libby Woodhatch
1.4	19/03/2021	Removal of 4-month extension window requirement for surveillance audits to qualify for remote auditing in point 1, page 1.	Libby Woodhatch
1.4	19/03/2021	Addition of further guidance to remote auditing options and scenarios in table 1 to allow for consecutive remote audits where applicable.	Libby Woodhatch
1.4	19/03/2021	Addition of guidance for remote auditing of subcontracting facilities on page 5.	Libby Woodhatch
1.4	26/03/2021	Addition of further guidance 'Certificate facility' on page 6.	Libby Woodhatch
2.0	25/05/2021	Updated to <i>Auditing Options and scenarios</i> , point 3, with regards to new applicants to the MarinTrust programme.	Libby Woodhatch
2.0	25/05/2021	Addition of guidance for new applicants to the MarinTrust Programme in point 3 of 'options and Scenarios' and table 1.	Libby Woodhatch
2.0	25/05/2021	Update of guidance for remote auditing of subcontracting facilities, page 4.	Libby Woodhatch
3.0	25/05/2022	Update to the validity of the Policy, and references to the validity throughout	Governing Body Committee
3.0	25/05/2022	Update of unilaterally cancelling or postponing audits and guidance on evidence that must be provided where cancellations or postponements are requested.	Governing Body Committee

3.0	25/05/2022	Update to subcontracting facilities undergoing remote audits. No longer defied by the risk assessment result of unit of certification.	Governing Body Committee