

PSU Derogation

Code	FSC-DER-2020-001	
Requirement (s)	<p>Clause 4.7.1 in FSC-STD-20-001 V4-0</p> <p>Clause 6.1.1 in FSC-STD-20-007 V3-0; INT-STD-20-007_37;</p> <p>Clause 2.6 e) of FSC-STD-20-011 V4-0; INT-STD-20-011_04</p>	
Request by CB	All FSC accredited CBs	
Rationale as provided by CB	<p>Due to the pandemic of novel coronavirus (COVID-19), vast areas of the world are subject to travel restrictions. INT-STD-20-011_04 foresees a case by case application for derogation by CBs in case of a demonstrated risk to the life or health of auditors, to replace an on-site audit with a desk audit. PSU is requested to give guidance on how CBs shall handle upcoming audits.</p>	
PSU conclusion	Scenarios for applying this derogation	<p>This derogation applies to audits in situations where:</p> <ul style="list-style-type: none"> – CBs assess there is a health risk involved in implementing an on-site audit; <p>or</p> <ul style="list-style-type: none"> – auditors are prevented from conducting an on-site audit due to travel restrictions.
	Main audits (initial certification)	Main audits shall not be replaced by desk audits and should be postponed.
	Surveillance audits	<p>CBs may apply either option below. CBs can apply either option below individually, or both options sequentially if needed.</p> <p>A. Surveillance audits may be postponed for a period not exceeding six (6) months beyond the maximum audit cycle of 15 months (in the case of CoC audits), but not beyond the end of 2020. FM audits can already flexibly be (re-)scheduled within a calendar year.</p> <p>B. Surveillance audits may be conducted as desk audits, when based on an assessment of the scale, intensity and risk of the Organization's activities it is concluded that a desk audit can credibly be conducted.</p> <p>Examples of the above that would prevent a desk audit include:</p> <ul style="list-style-type: none"> • open major CARs, • supply chain integrity issues (e.g. integrity investigations involving the certificate holder / production sector or trading species), • subcontracting / outsourcing of certified activities in response to the coronavirus outbreak, • ongoing complaints. <p>In the desk audit, certification bodies shall utilize information and communication technology (ICT) to evaluate all requirements from the annual audit plan</p>

		to the extent possible. Audits shall be conducted on the basis of virtual meetings / interviews with relevant people of the certificate holder and stakeholders, relevant documents and records, satellite images (where possible), and other best available information.
	Recertification audits	If a certificate is due to expire in 2020, it may be extended for up to twelve (12) months beyond its original expiry date by performing a surveillance audit (which may be conducted remotely in line with this derogation). A recertification audit shall then be performed before the maximum 12 month extension expires in order to renew certification.
	General	<p>In order to apply this derogation, CBs shall have a documented policy, procedure, or both, outlining the process to be implemented in case an audit is affected by the novel coronavirus (COVID-19) pandemic. This shall include:</p> <ul style="list-style-type: none"> - A method for assessing whether an on-site audit can be replaced with a desk audit, - A description of the desk audit methods to be applied in the case of FM and CoC, - A process to implement the reporting and record keeping requirements of this derogation. <p>Where audits cannot be conducted according to the options in this derogation, the certificate shall be suspended.</p> <p>CBs shall retain documented evidence for each case where this derogation has been applied and document the justification in the audit report.</p> <p>CBs shall submit an aggregated quarterly report to FSC on audits conducted according to this derogation. The first report shall be submitted within the first week of June 2020 (FSC will provide the report template).</p> <p>As soon as travel restrictions have been lifted, audits shall be conducted according to regular audit procedures.</p>
Scope of derogation	<input checked="" type="checkbox"/> Generic (applicable by all certification bodies) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)	
References	IAF ID 3: 2011: Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations IAF MD 4: 2018: The Use of Information and Communication Technology (ICT) for Auditing/ Assessment Purposes	
Approval date	30 January 2020; last amended 17 March 2020	
Period of validity	Until 31 of December 2020, or until withdrawn. This derogation will be updated as necessary.	