



Interpretative Document

# COVID-19 Normative Requirements

29 June 2020

Sustainable Biomass Program  
[sbp-cert.org](http://sbp-cert.org)



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For further information on the SBP certification system and to view the full set of documentation see [www.sbp-cert.org](http://www.sbp-cert.org)

This document replaces SBP normative documents:

- COVID-19: Normative Requirements 22 April 2020

COVID-19: Normative Requirements 29 June 2020 effective from 29 June 2020\*

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\* **Standard effective date:** SBP-certified organisations may implement this document and assessments may be conducted against it from the date of publication, 29 June 2020. All audits shall be conducted against this document from 29 June 2020.

### Document history

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In the case of inconsistency between translations, the official English language version shall always take precedence.

SBP welcomes comments and suggestions for changes, revisions and/or clarifications on all of its Standards documentation. Please contact: [info@sbp-cert.org](mailto:info@sbp-cert.org)

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## 1 Background

This document is an excerpt of the Normative Interpretations. It covers normative requirements for certification audits during the COVID-19 pandemic for Certification Bodies (CBs) providing SBP certification. This includes audits of Biomass Producers (BP), Traders and End-users and associated Chain of Custody (CoC) systems. The approach taken includes remote auditing and extension of time periods.

This interpretation only applies to audits in situations where:

- CBs assess there is a health risk involved in implementing an on-site audit; or
- auditors are prevented from conducting an on-site audit due to travel restrictions.

These requirements apply to audits scheduled until 31 December 2020, and to certificates with validity expiring to 31 December 2020.

SBP will continue to monitor the situation and revise the guidance, including extending timeframes, as required.

This interpretation will be reviewed by SBP no later than 30 September 2020.

## 2 Definitions

**Remote audit:** An audit where Information and Communication Technology (ICT) (Reference IAF MD 4:2018) is used for auditing purposes to replace on-site audit activities.

### 3 Reference documents

SBP Framework Standard 3: Certification Systems. Requirements for Certification Bodies Version 1.0

IAF Informative Document on the Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations (IAF ID 3: 2011 - Issue 1)

ISO 19011:2018 Guidelines for auditing management systems

IAF MD 4:2018 IAF MD for the Use of ICT for Auditing/Assessment Purposes

## 4 General requirements

### 4.1 General requirements for surveillance audits scheduled until 31 December 2020

4.1.1 For BPs with Supply Base Evaluations (certificates including Standard 1 in the scope) these audits may be undertaken in two parts.

4.1.1.1 Part 1 – A remote audit requiring the client to confirm:

- a) Any significant changes since the last audit;
- b) Any systematic failures since the last audit; and
- c) Receipt of any complaints or stakeholder comments since the last audit.

4.1.1.2 The remote audit shall be planned together with the other surveillance activities so that the certification body can maintain confidence that the client's certified management system continues to fulfil requirements between recertification audits.

4.1.1.3 Part 2 – On-site audit (where required under SBP Framework Standard 3) by 31 December 2020.

4.1.1.4 The Part 2 on-site audit shall be planned at the time of the remote audit, its implementation shall be subject to the policy and processes specified in 4.4.1 and formal travel restrictions.

Note: This requirement will be reviewed by SBP by 30 September 2020.

4.1.2 Scope extensions and surveillance audits for a Trader or End-user or Biomass Producer without Supply Base Evaluation (where the scope of certification does not include Standard 1) may be completed by remote audit.

4.1.3 Scope extensions for the Supply Base Evaluation of a Biomass Producer (where the scope extension includes Standard 1) shall be completed in compliance with 4.2.1 (scope extension to add an SBE requires an on-site audit prior to scope extension).

### 4.2 General requirements for main assessment audits scheduled until 31 December 2020

4.2.1 An on-site audit is required as part of a main assessment prior to issuing a new certificate to a Biomass Producer where the certification scope includes a Supply Base Evaluation (Standard 1). A remote audit may form part of the main assessment.

4.2.2 The main assessment prior to issuing a new certificate to a Biomass Producer where the scope does not include a Supply Base Evaluation (where the scope of the certificate does not include Standard 1) may be completed by remote audit. An on-site surveillance audit which is additional to the annual surveillance audit requirements is required within 6 months of the last date of the remote audit. Future surveillance audits shall be scheduled based on the last date of the remote audit.

4.2.3 The main assessment prior to issuing a new certificate to a Trader or End-user may be completed by remote audit.

4.2.4 For main assessment audits undertaken by remote audit the CB shall ensure that the certificate holder notifies the CB immediately that any claims are made in the DTS. Until an on-site audit is completed, the CB shall review the first 10 DTS claims made by the certificate holder within 7 days of each of those claims being made.

### 4.3 Extension of certificate validity

4.3.1 Certificate validity may be extended for up to six months upon request by the CB to SBP where a certificate is due to expire before 31 December 2020. The request by the CB to SBP must include the results of a remote audit completed in compliance with 4.1.1.1 and 4.1.1.2.

### 4.4 Requirements for CBs conducting any audits scheduled until 31 December 2020

4.4.1 The CB shall establish a documented policy and process, outlining the steps it intends to take where:

- a certified organisation is affected by the COVID-19 event; or
- the COVID-19 event affects the ability of the CB to undertake certification activities.

4.4.2 This documented policy and process shall include an assessment for each audit of the risks of continuing certification. This policy shall also ensure confidentiality, competence of the audit team regarding ICT, adequacy of the ICT available for the auditor/ audit and for each type of audit activity, maintenance of appropriate records, adequate level of sampling, adequacy of audit duration.

4.4.3 The guidance in IAF ID 3: 2011 - Issue 1 section 3. "Extraordinary event or circumstance affecting a certified organisation" shall be applied.

4.4.4 Corrective actions for open non-conformities can be verified by audit techniques other than on-site verification in cases where the CB has assurance that these other techniques show sufficiently clear evidence to conduct the verification.

4.4.5 For valid certificates that have corrective actions pending verification, the verification deadline may be extended by a period of no more than three months, which should then be reviewed as the three-month period comes to an end, based on the current travel and medical advice.

4.4.6 The CB shall immediately inform SBP of any material changes affecting a certificate.

4.4.7 CBs shall cooperate with ASI in the implementation of the guidance under IAF ID 3: 2011 - Issue 1 section 4. "Extraordinary event or circumstance affecting the CAB."

4.4.8 CBs shall implement IAF MD 4:2018 IAF MD for the Use of ICT for Auditing/Assessment Purposes.

4.4.9 In any case the CB shall always conduct opening and closing meetings for all audits, whether remote or on-site.

4.4.10 The CB shall provide SBP with information requested by SBP (including certificate name, scheduled remote audit dates and if appropriate on-site audit dates) before a remote audit is undertaken. The information shall be supplied sufficiently in advance to enable the audit to be witnessed by SBP or ASI.

4.4.11 SBP may require that any remote audit is witnessed by SBP or ASI as a condition of undertaking the remote audit.

4.4.12 SBP may require that any aspect of these requirements, including the procedures specified in 4.4.1, 4.4.2 and 4.4.3 are remotely assessed by SBP or ASI as a condition of proceeding with remote audits.

4.4.13 This interpretation does not affect SAR validity requirements, for example those specified in Instruction Document 5E clause 6.2.4. Where a remote SAR audit replaces an on-site SAR audit then the SAR shall expire 15 months after the remote SAR audit closing meeting.

## 4.5 Requirements for retaining records

4.5.1 The CB shall retain appropriate records of the decisions taken on this topic, and their justification. Examples are formal travel restrictions for cases where an audit was undertaken in two parts as described in 4.1, extension of certificate validity, evidence of risks mentioned in 4.4.2, evaluation of corrective actions, etc.