



Interpretative Document

COVID-19 Normative Requirements

18 June 2021

Sustainable Biomass Program
sbp-cert.org



18 June 2021

For further information on the SBP certification system and to view the full set of documentation see www.sbp-cert.org

This document replaces SBP normative documents:

- COVID-19: Normative Requirements 30 March 2021

COVID-19: Normative Requirements 18 June 2021 effective from 18 June 2021*

Formal status of document: Active

Approved by: CEO

Scheduled revision date: 30 September 2021

SBP contact information. T: +371 292 033 88; E: info@sbp-cert.org

* **Standard effective date:** SBP-certified organisations may implement this document and assessments may be conducted against it from the date of publication, 18 June 2021. All audits shall be conducted against this document from 18 June 2021.

Document history

22 April 2020: published 22 April 2020

29 June 2020: published 29 June 2020

30 September 2020: published 30 September 2020

15 December 2020: published 15 December 2020

30 March 2021: published 30 March 2021

18 June 2021: published 18 June 2021

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

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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 2021, and to certificates with validity expiring to 31 December 2021.

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

This interpretation will be reviewed by SBP no later than 30 September 2021.

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 and re-certification audits scheduled until 31 December 2021

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) within six (6) months after the audit field work target date.

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: A certificate may be re-issued after successful completion of a Part 1 remote re-certification audit.

4.1.2 Scope extensions, surveillance and re-certification audits may be completed solely by remote methods for the following certificate scopes:

- a) Trader
- b) End-user
- c) Biomass Producer without Supply Base Evaluation (where the scope of certification does not include Standard 1)
- d) Biomass Producer with Supply Base Evaluation where all Standard 1 indicators are evaluated as low risk.

Note: Scope extensions for the Supply Base Evaluation of a Biomass Producer (where the scope extension includes Standard 1 and not all indicators are low risk) shall be completed in compliance with 4.2.1 (scope extension to add an SBE requires an on-site audit prior to scope extension).

Note: The CB shall not use solely remote audit methods for more than two consecutive audits unless the remote audit is permitted in Standard 3 Instruction Note 3C (e.g. traders without physical possession or sales offices).

4.2 General requirements for main assessment audits scheduled until 31 December 2021

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 six (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 when 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 Requirements for CBs conducting any audits scheduled until 31 December 2021

4.3.1 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.

4.3.2 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.

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

4.3.4 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.

4.3.5 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.

4.3.6 The CB shall immediately inform SBP of any material changes affecting a certificate, e.g. not being able to conduct a remote audit or difficulty in conducting a part 2 on-site audit within the required timelines (i.e. part 2 audit per 4.1.1.3 or an additional on-site surveillance audit in accordance with 4.2.2). The information should include a detailed description of the situation and be provided in a timely manner.

4.3.7 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."

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

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

4.3.10 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 if required. The CB shall also make sure that the relevant fields in the Audit Portal are completed in a timely manner.

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

4.3.12 SBP may require that any aspect of these requirements, including the procedures specified in 4.3.1, 4.3.2 and 4.3.3 are remotely assessed by SBP or ASI as a condition of proceeding with remote audits.

4.3.13 This interpretation does not affect SAR validity requirements. 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.

4.4 Requirements for retaining records

4.4.1 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, evidence of risks mentioned in 4.3.2, evaluation of corrective actions, etc.