



Requirements for Certification Bodies: Certification under Emergency Measures caused by Coronavirus COVID-19

March 27, 2020

The need to protect your own personnel and that of producers and manufacturers of organic products and abide by government requirements and travel restrictions around the world in response to the COVID-19 virus is uniquely challenging to the work of inspection and certification. In this context, the IOAS has set out the following temporary requirements for accredited CBs on the minimum actions for continuing certification processes which are conducive to maintaining integrity whilst abiding by the restrictions currently in place to avoid further spread of the virus. These have been designed to provide a common framework but not add significant burden to CB personnel and operators leaving flexibility regarding decisions on what works best under local conditions to the CB. These are based upon the [IAF guidance](#) to CBs and ABs issued on February 21, 2020.

Individual scheme owners may publish their own requirements which IOAS will abide by, however the following requirements shall apply in their absence. Compliance with these requirements shall be reviewed at your next IOAS assessment.

Required

1. The CB shall establish **documented policy and procedures** that guide how it will continue to conduct 'inspection' and certification during the period of restricted access to certified client sites.
2. This (These) document(s) shall include:
 - a. How the CB intends to **inform its clients** of its approach. This information shall make clear that new applications for certification can only proceed up to the point of document review and preparing for inspection. No new certification shall be issued without on-site inspection. This applies also to extensions of scope and transfers that would normally require on-site inspection. *Additional information:* it is important that CBs inform clients clearly of their approach to enable them to understand what information may be needed, how remote inspection might be implemented and any restrictions there are for new applications, scope extensions, transfers of operators etc.;
 - b. Any changes to the annual update/re-application process in terms of **information to be submitted by the client**, to ensure enough information on the production/processing activities is available to the CB. *Additional information:* CBs shall consider requesting more detailed information in the annual update or during a process of more detailed document review before conducting a remote inspection. Traceback and input:output audits shall still be conducted according to scheme requirements either at this stage (by requesting the necessary information), during remote inspection or during follow up;
 - c. Measures and methods enabled to conduct **remote 'inspection' of clients** which shall at least include an interview by telephone or electronic means. *Additional information:* it is expected that a telephone interview or better a web-based conference can be performed in most instances. The latter shall be required for processors and larger companies so that documentation can be requested and

- examined on-line. Consideration should also be given to a video call to a mobile device so that the inspector can 'tour' the facilities and ask questions as needed;
- d. Approach to be taken if (in rare cases) an **interview is not possible**. *Additional information:* if interview is really not possible then desk review of documentation including additional requests for documents shall be required;
 - e. The CB shall take into account its **risk assessment** of individual clients and demonstrate what additional requirements or precautions it proposes to implement with regard to those considered to be higher risk. *Additional information:* additional inspection measures should be applied to high risk operations either during the period of remote-only inspection and/or after restrictions are lifted. Web-based conferencing and video calls should be required and sample taking at retail level or at other locations where allowed can be considered;
 - f. How CB **record keeping** may need to be adapted to provide transparency of process and justification for allowances made. *Additional information:* it is expected that CB record systems may need to adapt to be able to demonstrate and justify decisions taken during the period of restrictions. CBs should clearly instruct personnel on their expectations;
 - g. An allowance (if the CB deems needed) to **extend the period of validity** of current client certificates which shall not be beyond 6 months. If there is a postponement of expiry of the current certificate, its validity shall be that of the original document, not the full normal term starting from the date of the extension. *Additional information:* CBs may or may not need to extend the validity of certificates depending on the date of expiry, whether a satisfactory remote inspection was performed, and how long access restrictions are in place. All efforts shall be taken to maintain the current timing and avoid the need for extension;
 - h. The inspection **measures to be taken after lifting of site access restrictions** before continued certification can be confirmed. This shall depend on client type and risk category as well as the nature of the inspection measures achieved during the period of restricted access. *Additional information:* it is understood that remote inspection may be sufficient or may only represent a partial process leading to confirming certification depending on the nature of the certified client, risk level etc. The CB needs to define what follow up measures will be necessary for the various client circumstances once the access restrictions are lifted. This could include an 'additional' on-site inspection, unannounced inspection or sample taking.
3. CBs shall prepare such documentation and maintain appropriate records and have this available for review by the IOAS at their surveillance/re-assessment visit.

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