Reactive Guidance on RSB-PRO-70-001: audit schedule changes due to conditions beyond the control of POs and CBs

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1. Interpretation requested for the following scenario:

An RSB certified PO asked about the RSB position regarding changes related to the RSB audit type and/or schedule due the coronavirus (COVID-19) outbreak. Most areas of the world have travel restrictions and companies have their own policies to protect their employees.

Ensuring the health and safety of all people/staff involved in RSB audits is a priority, in line with RSB principles. Therefore, this guidance covers the conditions under which the RSB allows CBs to change audit schedules and/or to perform remote audits, considering travel restrictions due the coronavirus.

2. Applicable Standards

1. RSB-PRO-70-001\(^1\), Section H1.5. “Audit Plan” specifies the audit type (on-site or desk-based) for each type of operator and RSB scheme (RSB Global, RSB EU RED and RSB CORSIA) as well as conditions to conduct desk-based audits

2. Section H.3.6 (RSB-PRO-70-001) “Extension of the certificate validity and/or audit schedule changes” defines the conditions under which the CB may extend the specified period of validity of a certificate and/or delay the required audit schedule once per certification cycle, based on the PO risk class for 3 months (medium risk) or 6 months (low risk). The conditions include factors that are beyond the control of the PO and the CB.

3. Guidance

- **Guidance on remote audits**

  a) In line with H.1.5. (RSB-PRO-70-001) “Audit Plan”, CBs can assess whether an audit can be conducted remotely.

  b) Considering the exceptional circumstances created by the COVID-19 outbreak, operators may request in addition to the specifications of H.1.5. (RSB-PRO-70-001) that a remote audit is conducted for certification, re-certification and surveillance audits, instead of an

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on-site audit. The following process shall be undertaken to assess if an request is granted:

1. The operator shall submit the request to the contracted certification body and inform RSB (aurea.nardelli@rsb.org and infor@rsb.org) including the following information:
   - the scope of certification (at least information about the certification scheme (RSB Global or RSB EU RED); entities and facilities; inputs and outputs to be certified);
   - specification of the documents that the auditor will receive;
   - the systems that the auditor will be able to remotely access and
   - the filled RSB Risk Assessment Tool.
2. The certification body will assess whether the documentation and systems to be provided by the operator are sufficient to conduct the audit remotely and send the proposed agenda to the PO and the RSB Secretariat;
3. The RSB Secretariat will inform the operator and the certification body if the request is granted or refused;
4. In the case that the request is granted, and the audit is carried out remotely, the following audit (within 12 months of the issuance of the certificate) shall be an on-site audit.

Note 1: The RSB Secretariat may deny the request independent from the opinion of the certification body based on an internal risk assessment.

Note 2: During the remote audit, the auditor will assess the documentation provided, conduct interviews and remotely access systems by the operator. If the evidence that can be provided remotely is not sufficient to verify the compliance of the operator with the RSB Standards and Procedures, the auditor may still request an on-site audit to be conducted.

• Guidance on extending the certificate validity and delaying audit schedules

   a) For audits that do not allow for remote assessments, the requirements of H.3.6 (RSB-PRO-70-001) “Extension of the certificate validity and/or audit schedule changes”, includes provisions for conditions that are beyond the control of the POs and CBs (force majeure). The coronavirus outbreak is considered a force majeure globally, with the number of confirmed cases increasing rapidly and more and more countries implementing drastic measures limiting domestic and international travels, as well as stopping various non-essential activities.

   b) In the case that the COVID-19 situation does not improve within the accepted 3 months for medium risk or 6 months for low risk operators, the responsible certification body shall report the locations of the planned on-site audit to the RSB Secretariat who will evaluate the situation and decide on a case-by-case basis.

   Please note: All requirements specified in H.3.6 (RSB-PRO-70-001) must be met to extend the certificate validity and/or the audit schedule. Participating operators that have been assigned a high-risk class as per RSB Procedure for Risk Management (RSB-PRO-60-001)² are not allowed any extension, as specified in RSB-PRO-70-001, H.3.6.