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

6rd March 2020

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. Some areas of the world have travel restrictions and some 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 their audit schedule and/or to perform remote audits, considering travel restrictions due the coronavirus.

2. Applicable Standards

1. RSB-PRO-70-0011, Section H1.5. “Audit Plan” specifies when and where on-site audits and remote audits are required for each type of operator and RSB scheme (RSB Global, RSB EU RED and RSB CORSIA).

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

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

b) 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 under the following conditions:

- The audit is scheduled for a region with a significant number of reported COVID-19 cases with local transmission; this is currently the case for the following countries (or specific regions within these countries):
  - China
  - Republic of Korea
  - Japan
  - Singapore
  - Italy (provinces Lombardy, Veneto and Emilia-Romagna)
  - Iran

The RSB Secretariat will monitor the situation carefully and amend the list as necessary. In addition, based on request by CBs the RSB Secretariat will assess the situation in a given country and make the decision to amend the list.

- Auditors who were scheduled for the audit were in contact with COVID-19 infected persons. In this case, the on-site audit has to be conducted within three months irrespective of the risk class of the operator.

c) Please note, that 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)3 are not allowed any extension, as specified in RSB-PRO-70-001, H.3.6.

d) 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.

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2 See situation reports published by the WHO: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/situation-reports