

PSU Derogation

Code	FSC-DER-2020-001	
Requirement (s)	As indicated below	
Request by CB	All FSC accredited certification bodies (CBs)	
Rationale as provided by CB	Due to the pandemic of novel coronavirus (COVID-19), vast areas of the world are subject to travel restrictions. INT-STD-20-011_04 foresees a case by case application for derogation by CBs in case of a demonstrated risk to the life or health of auditors, to replace an on-site audit with a desk audit. PSU is requested to give guidance on how CBs shall handle upcoming audits.	
PSU conclusion	Scenarios for applying this derogation	<p>This derogation applies to audits in situations where:</p> <ul style="list-style-type: none"> – CBs assess there is a health risk involved in implementing an on-site audit; <p>or</p> <ul style="list-style-type: none"> – auditors are prevented from conducting an on-site audit due to travel restrictions.
	Preconditions for conducting desk audits	<p>1. CBs shall have a documented policy, procedure, or both, outlining the process to be implemented in case an audit is affected by the novel coronavirus (COVID-19) pandemic. This shall include:</p> <ul style="list-style-type: none"> - A method for assessing whether an on-site audit can be replaced with a desk audit, and - A description of the desk audit methods to be applied in the case of FM and CoC, and - A process to implement the reporting and record keeping requirements of this derogation. <p>2. CBs and certificate holders shall:</p> <ul style="list-style-type: none"> - have the technical and operational capacity to conduct audits remotely, and - agree on a secure and confidential data transmission, and - ensure the availability of key staff. <p>3. CBs shall utilize information and communication technology (ICT) to evaluate all requirements from the annual audit plan to the extent possible.</p> <p>4. Desk audits should be conducted on the basis of:</p> <ul style="list-style-type: none"> - virtual video meetings / virtual company tour, - interviews with relevant people of the certificate holder and stakeholders, - relevant documents and records, - satellite images (where possible), and other best available information.
	Forest Management Pre-evaluations FSC-STD-20-007 V3-0 Definition Pre-evaluation	Pre-evaluation audits may be conducted as desk audits if it is concluded that a desk audit can credibly be conducted.
	Forest Management main audits (initial certification)	Main audits shall not be replaced by desk audits and should be postponed.

FSC-STD-20-007 V3-0 Clause 5.4.2	
Chain of Custody main audits (initial certification)	This is R regulated in FSC-DER-2020-005
Surveillance audits FSC-STD-20-001 V4-0 Clause 4.7.1 FSC-STD-20-007 V3-0 Clause 6.1.1; INT-STD-20-007_37 FSC-STD-20-011 V4-0 Clauses 2.6 e), 9.2; INT-STD-20-011_04; Clause 9.2 and 9.3	<p>CBs may apply either option below. CBs can apply either option below individually, or both options sequentially if needed.</p> <p>A. Surveillance audits may be postponed for a period not exceeding six (6) months beyond the maximum audit cycle of 15 months (in the case of CoC audits), but not beyond the end of 2020. FM audits can already flexibly be (re-) scheduled within a calendar year.</p> <p>B. Surveillance audits may be conducted as desk audits, when based on an assessment of the scale, intensity and risk of the Organization's activities it is concluded that a desk audit can credibly be conducted.</p> <p>Examples of the above that would prevent a desk audit include:</p> <ul style="list-style-type: none"> • Certificate holders with open major CARs that require on-site verification, • Certificate holders with purchase/sales mismatches proven through supply chain investigations conducted by the CB, ASI or FSC supply chain integrity issues (e.g. integrity investigations involving the certificate holder / production sector or trading species), • Certificate holders who fail to report purchase/sales when requested through a supply chain investigation, • Certificate holders with high-risk contractors / outsourcing of certified activities, • unresolved complaints. <p>Where audits cannot be conducted according to these options, the certificate shall be suspended.</p>
Recertification audits FSC-STD-20-001 V4-0 Clause 1.4.2 and 1.4.3	<p>If a certificate is due to expire in 2020 it may be extended for up to twelve (12) months beyond its original expiry date, if by performing a surveillance audit (which may be conducted remotely in line with this derogation).</p> <p>A recertification audit shall then be performed before the maximum 12-month extension expires in order to renew certification.</p>
Scope change audits FSC-STD-20-001 V4-0 Clause 4.8.3	Changes in the scope of certification shall be handled in line with FSC requirements and in accordance with operational procedures of CBs. Where on-site audits are required, these audits need to be postponed as necessary before a change of scope may be granted.
Transfer audits FSC-PRO-20-003 V1-0 Clause 3.2.f)	<p>FM: on-site audits shall not be replaced by desk audits in case of voluntary transfer of certificates to a new CB.</p> <p>CoC: in case of voluntary transfer of certificates to a new CB, on-site audits may be replaced by desk audits for low risk scenarios and by a two-stage audit for medium risk scenarios as described in FSC-DER-2020-005, on-site audits may be replaced by desk audits in case of voluntary transfer of certificates to a new CB.</p>

	On-site internal audits of bodies providing outsourced services FSC-STD-20-001 V4-0 Clause 2.5.5	Where 3-yearly on-site audits of bodies providing outsourced services to CBs are due in 2020, the annual on-site audit may be replaced by a desk audit.
	General	1. CBs shall retain documented evidence for each case where flexibility offered by this derogation has been applied, and document the justification in the audit report (as applicable).
		2. CBs shall submit an aggregated quarterly report to FSC on audits conducted according to this derogation. The first report shall be submitted by the end of June 2020 (FSC will provide the report template).
Scope of derogation	<input checked="" type="checkbox"/> Generic (applicable by all certification bodies) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)	
References	IAF ID 3: 2011: Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations IAF MD 4: 2018: The Use of Information and Communication Technology (ICT) for Auditing/ Assessment Purposes	
Approval date	30 January 2020; last amended 21 April 07 May 2020	
Period of validity	Until 31 of December 2020, or until withdrawn. This derogation will be updated as necessary.	