FairWild Foundation

COVID-19 Pandemic

Guidance Document for Certification Bodies Auditing the FairWild Standard

(applicable for audits in 2020)

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1. Auditing during COVID-19 restrictions

1.1 Background

The outbreak of the novel coronavirus SARS-CoV-2 has led to a difficult time for people and businesses with significant impacts on public health, economies, and the lives of countless individuals around the world. By all predictions it will continue to cause major shocks in 2020, as well as long term impacts that are yet unknown.

This document provides information on FairWild Foundation's (FWF) actions to date in response to the outbreak, resulting in a changed approach to auditing and certification due to COVID-19.

Thanks to the fast advances in technology, conducting remote audits is becoming more popular among organizations and acceptance of the market has increased substantially during the last weeks. Certification bodies will certainly have to adapt to this new situation. In fact, the last version of ISO 19011:2018, Guidelines for auditing management systems, includes new specifications for conducting remote audits in order to carry out this transition to e-auditing.

Survive, Strengthen, Built to Last.

In the current situation virtual audits are the most likely option and definitely better than not performing audits at all (Survive). Standard compliance can still be assessed no matter the environment, with certain key changes in the way audits are performed (Strengthen). We are convinced that this experience will change the way we handle auditing in future (Built to Last).

1.2 FairWild options for 2020

FW certified operations:

Many legal and private standard owners have meanwhile published their policies for how to go about with audits in time of COVID-19 restrictions. Regarding FairWild certification, accredited CBs are given three options how to proceed with already FW certified operations for the annual audits in 2020:

I. **Regular on-site audit** where possible, allowed and not objected by the FWF (*see chapter 2*).

II. **Partly remote audit** with a postponed visit on-site (*see chapter 3.2*).

III. **Full remote audit** with the help of technical infrastructure where the audit is done online but in the same procedure as it would be onsite with the exception of a visit to the fields/collection area (*see chapter 3.1*).

The FairWild scheme manager of the accredited CB should decide which of these options to pursue for each of their clients, based on an assessment of risks involved, the past performance of the certified operator, and feasibility / work planning considerations. Consultation with FWF is required as outlined below.

Audit option	Procedures in 2020	Conditions
I. Regular on-site audit	Yes, if • Possible (access, staff). • Legally allowed (regional/local restrictions). • Based on a risk assessment.	• Regular annual on-site audits - at usual time scheduled to take place at least 3 months before the end of the current certificate - can be postponed by a maximum of 6 months (to be scheduled latest by 31st December 2020). • In this case, a bridging certificate extension may be issued for a maximum of 6 months from the date of expiry of the 2019 certificate.
II. Partly remote audit + postponed on-site visit	A combination of partly remote audit and postponed on-site visit will be regarded as a full annual audit.	• The partly remote audit will take place at least 3 months before the end of the current certificate. • The auditee must agree with an online audit and provide for the necessary technical infrastructure. • A detailed audit plan as well as a copy of the price offer shall be submitted to the FWF. • An extension of the 2019 certificate can be issued based on the outcomes of the partial remote audit. The validity date will be latest until 31st December 2020. • The on-site audit will be scheduled when the risk level decreases (to be scheduled latest by 31st Dec 2020) and once it has been conducted, the new (2020) certificate can be issued. • In case the on-site visit scheduled for later in 2020 cannot be realized, a full remote audit will have to be conducted for the issue of a new certificate.
III. Full remote audit	A full remote audit will replace the annual audit.	• The full remote audit will be scheduled at the same time as the normal annual audit. • The auditee must agree with an online audit and provide for the necessary technical infrastructure. • A detailed audit plan as well as a copy of the price offer shall be submitted to the FWF. • The visit to the collection area / operation premises is suspended for the year 2020. • A fully completed remote audit will allow a new (2020) certificate to be issued, valid for up to 15 months as per usual. • However, an on-site visit is obligatory for the next certificate (2021).

New FW applicants:

Granting FairWild certification to new YEAR 1 operations prior to an on-site audit is usually not feasible and possibilities and procedures will have to be decided case by case.

2. On-site audits

The outbreak of the novel coronavirus SARS-CoV-2 is likely to cause challenges for the health and livelihoods of harvesting communities around the world, as well as the global value chains of wild-harvested natural ingredients that they supply. While the virus has not yet reached many of the more remote areas where FairWild projects are located, these areas are at risk – with fragile healthcare systems, poverty, lack of infrastructure and market disruption likely to amplify the negative impacts already seen around the globe.

For this reason, on-site audits – if possible and legally allowed at all – have to be based on a careful risk assessment. Under no circumstances should the audit become the gateway to the virus in the area to be controlled, e.g. it must be possible to rule out that the auditor is a potential SARS CoV-2 carrier.

In any case, evidence of the risk assessment together with confirmed information on legally allowed access to the collection area has to be submitted to and not objected by the FWF.

3. Remote audits

A remote audit is in principle the same as an audit but using electronic means to remotely obtain audit evidence and evaluate it objectively in order to determine the extent of conformity to the standard/audit criteria.

Main remote audit techniques are:

- sharing files via email, Google drive, Clouds, etc. (desk audit)
- sharing documents by desktop screen (on-time)
- video conferences using Skype, Microsoft Team, Zoom, etc.
- interviews by phone, Skype, Zoom etc.
- live video / surveillance videos

We realize that in most cases it is not possible to conduct a remote audit with fully equal coverage and credibility to an on-site one. There is no question that being physically present at an audit keeps the process moving. In a virtual audit, the auditor is both blind and partly unfamiliar with the situation on-site.

Some areas that can present difficulties during a remote audit involve manufacturing processes, product storage and of course visits to fields and collection areas. In these cases, remote audits can use live video or even surveillance video to gather the necessary audit evidence. Surprisingly, however reviewing documents and records virtually can be even more effective than doing so on-site.

For each situation, the challenging areas and those not possible to be verified remotely need to be identified - a special focus will be placed on these during the next regularly upcoming on-site visit – and taken into account when preparing the audit and designing the audit plan (*see chapter 4.3.*).

3.1 Full remote audit

A full remote audit is accepted by the FWF to replace the annual audit in 2020 if the CB follows the performance as described below:

- The auditor will conduct the audit remotely using Skype, WhatsApp or other platforms to communicate with the client.
- The audit will include document review as well as remote interviews with staff and collectors.
- The client is expected to be able to "share screen" to enable the auditor to evaluate online information.
- The quality system can be accessed remotely. Not just the documents, but all of the records that provide objective evidence that the quality system is working
- Evidence of the collection areas will be provided by maps and other meaningful documents.
- The auditor may also ask the client to have a live video feed to show the facilities and/or share pictures.

3.2 Partly remote audit

A partly remote audit is an audit split between a remote audit, and an on-site audit. In practice a remote audit as described above will be conducted firstly. This will be followed by an on-site audit when the situation improves, with focus on evaluating requirements that could not be evaluated during the remote audit, such as visits to collection areas, interviews with collectors and others.

4. Audit Planning

4.1 Technical equipment

Finding the right remote auditing delivery mode for a sustainability standard such as Fair-Wild is a challenge for most certification bodies and need to be aligned to comply with the requirements of accreditation bodies, scheme owners and other regulatory bodies. Solutions for current challenges in auditing are:

- Computer-assisted audit techniques (CAAT)
- Telephone and video conferences
- 360° camera and video equipment
- Interactive web-based communication methods, such as Webex, Zoom, MS Teams, Skye etc.
- Remote access to documentation of the management system and its processes
- Digital audits mixed with reality solutions, for example, the use of hololens spectacles or VR web applications.
- UAV mapping drones

Vice versa it has to be ensured that the company to be audited has the necessary technical infrastructure for successfully conducting remote audits.

- Access to a good internet connection.
- A smart phone or tablet or lap-top with camera and sound / headset
- To know how to use Skype or other video platforms.

4.2 Preparation of auditees

Right in time before scheduling a remote audit, the certification body has to do an initial assessment that an operator qualifies for remote audits:

- The auditee explicitly agrees to have a remote audit.
- The auditee can provide for the necessary technical infrastructure for participating in an online audit.
- The auditee is being informed about details and requirements of such an audit.
- In terms of pricing for remote audits, the certification body shall exclude any direct travel expenses, which will not be applicable.

4.3 Audit plan

The audit plan includes all activities necessary for planning, organizing and conducting the audit. It is a detailed description of the activities and arrangements for the audit, such as:

Objectives	• Conformity with a standard • Risk assessment of operator to be audited	
Extent	• Scope (audit criteria) • Duration and time frame • Complexity (number of products, locations, collection areas, collectors etc.) • Changes to previous audit • Non-conformities	
Responsibilities	• Identification of areas to be covered by the remote audit	There are topics that cannot be audited remotely. These limitations need to be identified together with the auditee before the audit and be reflected in the audit plan.
	• Determination of method to assess the identified areas (*see chapter 3.*)	i.e. collectors' interviews through Skype; in and outgoing stock quantities through screen share.
	• Selection of technical equipment for the chosen method (*see chapter 4.1*)	
Resources	• Availability of technical equipment	
Procedures	• Planning and scheduling of the audit (audit time-line and management)	Determination of the time frame and frequency of the planned online-sessions. An audit might be break up into smaller timeframes to allow the auditor time to review documents, records, and other objective evidence. Make sure the audit plan takes extra measure for time management.
	• Information and instruction to auditee (*see chapter 4.2*)	Determination and check out of communication method with the auditee. Provide auditee with a list of documents you want to receive before the audit (set deadline). Inform auditee about the staff you want to talk to and the number of interviews you will conduct.

	• Preparation	Download key documentation on a file sharing service before the audit
	• Conducting the audit	Have your IT person standing by in case of access issues.
	• Reporting (checklist)	• Previous years documentary non-conformities need to be clarified. • Non-conformities that could not have been solved for impossibility to do site visits must be listed again as violations (with an explanatory comment). • All areas, which could not be checked will be noted as "not applicable" (typically the ones linked to site visits, etc). • In case documents, systems or interviews are not available or possible to be carried out during the scheduled online audit will be classified as non-conformities.

5. FairWild Standard during COVID-19 pandemic

The outbreak of SARS-CoV-2 presents significant challenges to the business operations of wild collection operations, and to the health and livelihoods of collectors, workers and their families.

In 2020, increased flexibility will be allowed in terms of permitted uses and decision-making processes for the FairWild Premium fund. The funds may, for example, be used to minimize the spread of disease, such as by purchasing and distributing personal protective equipment (PPE) to harvesters or by implementing hygiene campaigns. To counter loss of income, funds may also be distributed as cash payments (or consumable goods) to the Premium fund beneficiaries in 2020. Where necessary, decisions on use of the funds may be made by the Premium fund administration body without waiting for approval through the collectors' assembly (or alternative decision-making system system), but in an expedited process that will instead document expenditures for retroactive ratification. Once the regular decision-making process for the fund is again possible, the fund administrators need to explain the changes and ratify the Premium use retroactively. The fund administration may in this way disburse up to 100% of the annual Premium Fund contribution (based on the average contribution over the last 3 years) without prior consultation with the FairWild-accredited CB, or amounts greater than 100% following a "no objection" by the CB.

Conversely, other aspects will require greater attention to be paid. The FairWild Standard includes Principles and Criteria on safe working environment and the application of responsible management practices, which include safe working practices to prevent the spread of communicable diseases such as SARS-CoV-2. For guidance on basic protective measures against the COVID-19 outbreak please consult the information provided by the World Health Organization. FairWild-certified organizations must develop and implement safe working practices to combat COVID-19, including conducting risk assessments and implementing new measures among their workforce and wild harvester suppliers. It should also be ensured that existing protections, for example gender discrimination, protection of pregnant workers, and other worker rights, are not weakened during the crisis.

Additional resources and information will be made available through the FairWild website where possible.

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