

FairWild Foundation

COVID-19 Pandemic

Guidance Document for Certification Bodies Auditing the FairWild Standard

(applicable for audits in 2021)



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1. Auditing during COVID-19 restrictions

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. Impacts are continuing into 2021 and beyond, and the longer term implications are still unknown.

This document provides information on FairWild Foundation’s (FWF) actions 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 in 2020. Certification bodies have adapted to this new situation. The last version of ISO 19011:2018, Guidelines for auditing management systems, includes new specifications for conducting remote audits that have facilitated this transition to e-auditing. Experience has been rapidly accrued in 2020, and good practice guidance is under development by organisations such as ISEAL¹ and Fairtrade International (Flocert)².

Survive, Strengthen, Built to Last.

Despite the significant advancements in managing the pandemic with testing, quarantines, distancing measures, and the development and roll-out of vaccines, the COVID-19 outbreak is not under control in 2021 and significant outbreaks are still occurring in parts of the world. Access to vaccines is uneven, with limited availability particularly in many developing countries. In the current situation virtual audits are still required in many scenarios and definitely better than not performing audits at all (Survive). Standard compliance can still be assessed, with certain key changes in the way audits are performed (Strengthen). Beyond the immediate challenge of managing audits in the second year of the pandemic, we anticipate that this experience will change the way we handle auditing in future (Built to Last).

¹ <https://www.isealliance.org/about-iseal/our-work/remote-auditing>
² <https://www.flocert.net/wp-content/uploads/2017/09/CERT-RemoteAudit-SOP-10-en.pdf>

2. On-site audits

The outbreak of the novel coronavirus SARS-CoV-2 has caused 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. Many of the more remote areas where FairWild projects are located are at particular 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 – must be based on a careful risk assessment, and careful implementation of social distancing and hygiene measures. Under no circumstances should the audit become the gateway to the virus in the area to be controlled. COVID-19 tests should be used prior to the audit to reduce the risk that the auditor is a potential SARS CoV-2 carrier. The audit methods themselves should be adapted to enable physical distancing measures; for example, conducting interviews outside and at a safe distance; use of masks and hygiene measures; surveying documentation remotely where possible to reduce the time on-site / indoors; ensuring rooms are ventilated; considering safer transport options.

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 5*).

3.1 Full remote audit

A full remote audit is accepted by the FWF to replace the annual audit in 2021 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 individual 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 Hybrid audit

A hybrid audit is split between a remote audit, and an on-site audit. In practice a remote audit as described above will be conducted firstly, 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 and interviews with collectors.

4. FairWild Auditing Options for 2021

Building on the approach taken in 2020, accredited CBs are given three options how to proceed with already FW certified operations for the annual audits in 2021:

- I. **Regular on-site audits** where possible, allowed and not objected by the FWF.
- II. **Hybrid audits** with a combination of partly remote audit and an additional on-site visit.
- 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.

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.

If a remote audit has taken place in 2020, options I or II should be taken where possible; however, safety of the audit participants is paramount. Given the current circumstances, it is acceptable to undertake remote audits two years in a row – based on a risk analysis by the CB and “no objection” by FWF. If risks of non-compliance are considered high, or it is simply not possible to judge an operation remotely due to its complexity or other factors, a temporary suspension of certification should be discussed with FWF (in which case a special category will be indicated).

The following audit options will be regarded as a full annual audit by the FairWild Foundation, subject to the agreement and confirmation of the operation to be audited that the necessary technical infrastructure can be provided for. Consultation with FWF is required as outlined below.

I. Regular On-Site Audits	
A. On-site audits under COVID conditions	
definition	FW on-site audits during COVID pandemic are possible under certain conditions.
application	Any operation (already FW certified, new FW applicant)
auditor requirements	<ul style="list-style-type: none"> • Auditors shall not show any COVID symptoms when travelling to on-site visits. • Legal COVID regulations and general hygienic precautions and measures apply.
period	
certification	
FWF requirements	<p>On-site visits may be carried out only:</p> <ul style="list-style-type: none"> • where legally allowed (regional/local restrictions); • based on a risk assessment. <p>Plans for on-site audits should be notified to FWF as part of the routine audit planning, with confirmation that the above points have been addressed.</p>
other points	<ul style="list-style-type: none"> • COVID-19 tests should be used prior to the audit to reduce the risk that the auditor is a potential SARS CoV-2 carrier. • Auditors should preferably be vaccinated.

II. Hybrid Audits - Combination of Remote Audit + On-Site Visit	
B. Hybrid audit for FW certified operations and new FW applicants	
definition	The audit involves a combination of remote audit and on-site visit. Different options may be taken including use of different auditors for the remote and on-site components, and postponing the on-site component until conditions allow.
application	Any operation (already FW certified, new FW applicant)
auditor requirements	<ul style="list-style-type: none"> • The remote audit needs to be carried out by an approved FW auditor. • The on-site visit can be carried out by the same auditor (i.e. in case of postponement), or by a qualified organic inspector under the close supervision of the FW auditor or FW scheme manager. • Legal COVID regulations and general hygienic precautions and measures apply.
period	<ul style="list-style-type: none"> • The partly remote audit will take place at least 3 months before the end of the current certificate. • The on-site visit will be scheduled at the same time or can be postponed to a period when the risk level decreases (to be scheduled latest by 31st Dec 2021).
certification	<p>For current FW certified operations:</p> <ul style="list-style-type: none"> • An extension of the 2020 certificate can be issued based on the outcomes of the partial remote audit. The validity date will be latest until 31st Dec 2021. • Once both audit parts have been conducted, the new (2021) certificate can be issued. <p>For new FW applicants:</p>

	<ul style="list-style-type: none"> • New operations can only receive the Y1 certificate after both audit parts have been conducted.
FWF requirements	<p>The following documents need to be submitted before the start of the audit, in order that a “no objection” may be issued by FWF:</p> <ul style="list-style-type: none"> • Detailed audit plan, defining clearly the areas to be covered by the remote audit and those by the on-site visit. • Risk assessment. • Copy of the price offer.
other points	<ul style="list-style-type: none"> • COVID-19 tests should be used prior to the on-site component to reduce the risk that the auditor is a potential SARS CoV-2 carrier. • Auditors should preferably be vaccinated.

III. Full Remote Audits

C. Remote audit for FW certified operations

definition	Full remote audit; the visit to the collection area / operation premises is suspended until the year 2022.
application	Only for already FW certified operations.
auditor requirements	Experienced FW approved auditor.
period	The full remote audit will be scheduled at the same time as the normal annual audit.
certification	A fully completed remote audit will allow a new (2021) certificate to be issued, valid for up to 15 months as per usual.
FWF requirements	<p>The following documents need to be submitted before the start of the audit, in order that a “no objection” may be issued by FWF:</p> <ul style="list-style-type: none"> • Risk assessment based on previous audit reports and findings. • Detailed audit plan, defining clearly the areas that can be covered by the remote audit. • If an operation will be audited remotely in both 2020 and 2021, an on-site visit must be planned for 2022. An audit plan for 2022 including training of local auditors (where needed) must be sent to FWF together with the 2021 audit plan. • Copy of the price offer.
other points	<ol style="list-style-type: none"> 1. New collection site: full remote audit accepted for 2021 under the following conditions: <ul style="list-style-type: none"> • Risk assessment based on substantial information provided by the operator about the new collection site (e.g., organic inspection visit in previous years). 2. New species to be certified: full remote audit accepted for 2021 under the following conditions: <ul style="list-style-type: none"> • The species is not a high-risk plant. • Risk assessment based on information provided by the operator such as a resource assessment and/or other related information.

D. Remote audit for new FW applicants

definition	Full remote audit; the visit to the collection area / operation premises is suspended until the year 2022.
application	New FW applicants (YEAR 1 of certification)

auditor re-requirements	Experienced FW approved auditor. A local resource person may support field elements where available. If so, legal COVID regulations and general hygienic precautions and measures apply.
period	The full remote audit will be scheduled at the same time as the normal annual audit.
certification	A fully completed remote audit will allow a certificate to be issued under the following conditions: <ul style="list-style-type: none"> • EITHER the collection area was visited in the previous year as part of an independent audit (third party proof available). • OR Descriptive and meaningful information based on prior site visits is available (e.g., pre-audit assessment, organic wild crop audit report).
FWF re-requirements	Granting FairWild certification to new YEAR 1 operations prior to an on-site audit is complex and possibilities and procedures are being decided case-by-case, based on the following information to be submitted by the CB: <ul style="list-style-type: none"> • Risk assessment based on descriptive and meaningful information on prior site visits (e.g., pre-audit assessment, organic wild crop audit report) with detailed information on collection sites. • Detailed audit plan detailed audit plan, defining clearly the areas that can be covered by the remote audit. • If a new operation will be audited remotely in 2021, an on-site visit must be planned for 2022. An audit plan for 2022 including training of local auditors (where needed) must be sent to FWF together with the 2021 audit plan. • Copy of the price offer.
Other points	New operations are in any case still encouraged to proceed with their application for FairWild certification, including contacting FWF to arrange risk analysis of the target species and to review audit options together with their nominated CB. Following risk analysis, applicants may be listed on the “potential operators” page of the FairWild website . Such operations - if, for example, already organic certified – may also be prioritised to supply ingredients in case of derogations granted in respect of temporary shortages of FairWild-certified ingredients during the pandemic.

5. Audit Planning

5.1 Risk Assessment

Before scheduling a remote audit, CBs and auditors need to assess whether a remote audit would be effective enough. In order to decide whether an audit can be (partially or completely) conducted remotely, the following criteria – but not limited to it - should be applied:

- Availability of the necessary infrastructure to support the use of the ICT³ proposed (e.g., video communication system, internet access, bandwidth).
- Systematic implementation of the management system where records, data, etc. can be reviewed at any site, regardless of where the work is being performed.
- Complexity of the site (e.g., number of collected species and collection sites).
- Familiarity of the auditor with the management system, practices and facilities of the operation.

³ Information and Communication Technology

- Risk classification of species.
- Previous performance of the operation, such as the number and severity of non-conformities. Particular attention should be paid to Category A certification conditions.

5.2 Technical equipment

Finding the right remote auditing delivery mode for a sustainability standard such as FairWild 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, Skype 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.

5.3 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.

5.4 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	<ul style="list-style-type: none"> • Conformity with a standard • Risk assessment of operator to be audited 	
Extent	<ul style="list-style-type: none"> • Scope (audit criteria) • Duration and time frame • Complexity (number of products, locations, collection areas, collectors etc.) • Changes to previous audit • Non-conformities 	

Responsibilities	<ul style="list-style-type: none"> • 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.
	<ul style="list-style-type: none"> • Determination of method to assess the identified areas (<i>see chapter 3.</i>) 	i.e. collectors' interviews through Skype; in and outgoing stock quantities through screen share.
	<ul style="list-style-type: none"> • Selection of technical equipment for the chosen method (<i>see chapter 4.1</i>) 	
Resources	<ul style="list-style-type: none"> • Availability of technical equipment 	
Procedures	<ul style="list-style-type: none"> • 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.
	<ul style="list-style-type: none"> • Information and instruction to auditee (<i>see chapter 4.2</i>) 	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.
	<ul style="list-style-type: none"> • Preparation 	Download key documentation on a file sharing service before the audit
	<ul style="list-style-type: none"> • Conducting the audit 	Have your IT person standing by in case of access issues.
	<ul style="list-style-type: none"> • Reporting (checklist) 	<ul style="list-style-type: none"> • 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.

6. 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 2021, increased flexibility will continue to 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 2021. 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), 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 the latest guidance on protective measures against the COVID-19 outbreak please consult the information provided by the World Health Organization. Information on public health measures and the local situation provided by the national government of the country concerned should also be consulted. 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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