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SFI Inc. Guidance Regarding Audit Restrictions Due to COVID-19

Due to the spread of COVID-19 in the United States, Canada and internationally, travel and medical restrictions may impact SFI auditing activities. In order to give flexibility to certification bodies and Program Participants impacted by these restrictions, SFI Inc. is issuing the following guidance.

The main methods to ease the consequences of travel restrictions are the implementation of remote audits, and where this is not sufficient, the extension of time periods affecting the certificate. This guidance is based on SFI Sections 2, 3, 4, 6 and 9, International Accreditation Forum (IAF) documents and ISO 19011.

This guidance enters into force and can be applied by certification bodies from the day of its publication (March 12, 2020) and is applicable until SFI Inc. revokes the guidance.

Reference documents

- SFI Section 2: SFI 2015-2021 Forest Management Standard
- SFI Section 3: SFI 2015-2021 Fiber Sourcing Standard & Appendix 1 Rules for Use of the Certified Sourcing
- SFI Section 4: SFI 2015-2021 Chain of Custody Standard
- SFI Section 6: Part 14. SFI 2015-2019 Chain of Custody Standard and SFI On Product Label Use
- SFI Section 9 – Audit Procedures and Auditor Qualifications and Accreditation
- IAF Informative Document on the Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations (IAF ID 3: 2011 - Issue 1)
- IAF Mandatory Document for the Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes (IAF MD 4:2018 - Issue 2)
- ISO 19011:2018 Guidelines for auditing management systems

Guidance

1. General procedures for the application of this guidance

- 1.1 The certification body should establish a documented policy and process, outlining the steps it intends to take in case that a Program Participant is impacted by COVID-19 related restrictions. The policy and process can cover either an affected Program Participant (e.g. a manufacturing plant, forest lands) forced to curtail activities due to the risks to the workforce, or customers of such a Program Participant forced to adjust its supply chain dynamics.
- 1.2. This documented policy and process should include an assessment of the risks of continuing certification.
- 1.3. Each case should be evaluated and documented by the certification body to provide evidence whether, and to what extent, the Program Participant is impacted by COVID-19 related restrictions.

- 1.4. The certification body also needs to consider the risks related to cases where planning / conducting of the audit is not easy because reaching the Program Participant's facilities or ownership may be difficult or inadvisable for the auditor (e.g. restrictions because of national or local rules, health risks, flight cancellations, etc.)
- 1.5. The provisions outlined in this guidance only apply to Program Participants who are impacted by the COVID-19 event, according to the evaluation conducted by the certification body. They do not apply in any other case.

2. Initial and re-certification audits

- 2.1. Generally, recertification audits shall not be replaced by remote audits.
- 2.2. For recertification audits which cannot proceed as scheduled, the validity of certificates may be extended by a period of no more than twelve months, provided a remote surveillance audit is conducted. Certification Bodies can find the requirements on how to use information and communications technologies to support and maintain the integrity of the audit in IAF MD4. The recertification audit shall be completed before the maximum 12-month extension expires.
- 2.3. For SFI Chain of Custody Standard or SFI Fiber Sourcing – Appendix 1: Rules for Use of the SFI Certified Sourcing Label audits, initial and re-certification audits may be conducted remotely in accordance with IAF MD 4, part 4.2 Process Requirements. The certification body shall demonstrate that the full scope of the audit can be covered using ICT tools and can justify that the audit techniques used deliver sufficient confidence in the Program Participant's compliance with the certification criteria.
- 2.4. As soon as travel and medical restrictions are lifted, audits shall be conducted as per the applicable standard and any other applicable procedures. For any recertification audit which does not take place once the travel restrictions have been lifted, the certificate shall be suspended.

3. Surveillance audits

- 3.1. Program Participants with a SFI Chain of Custody or a Fiber Sourcing Appendix 1 certificate who can demonstrate they have not sold any materials with an SFI claim since their last audit can have the surveillance audit waived.
- 3.2. For Program Participants with a SFI Forest Management Standard or a SFI Fiber Sourcing certificate the surveillance audit can be conducted remotely using other audit techniques, such as documentation and records review, technology, etc. where:
 - a. the certification body can justify that the audit techniques used deliver sufficient confidence in the Program Participant's compliance with the certification criteria; and
 - b. no nonconformity was raised during the previous initial, surveillance or recertification audit or the corrective action for the nonconformity can be clearly verified by other audit techniques; and
 - c. the client Program Participant's provides the certification body with access to records required to be kept by the SFI Forest Management Standard or Fiber Sourcing Standard or a list of all the records that allow the certification body to establish an independent sampling.

- 3.3. For Program Participants with a SFI Chain of Custody certificate or a Fiber Sourcing Appendix 1 certificate, the surveillance audit can be conducted remotely using other audit techniques, such as documentation and records review, technology, etc. where:
- a. the certification body can justify that the audit techniques used deliver sufficient confidence in the Program Participant's compliance with the certification criteria; and
 - b. no nonconformity was raised during the previous initial, surveillance or recertification audit or the corrective action for the nonconformity can be clearly verified by other audit techniques; and
 - c. the Program Participant's supply chain does not include significant risk supplies; and
 - d. the client Program Participant's provides the certification body with access to records required to be kept by the SFI Chain of Custody Standard or Fiber Sourcing Appendix 1 or a list of all the records that allow the certification body to establish an independent sampling.
- 3.4. For Program Participants with SFI Forest Management Standard or SFI Fiber Sourcing Standard certificates whose surveillance audit **cannot be conducted remotely** using other audit techniques, the surveillance audit can be extended by a period of no more than six months, and then reviewed as the six month period comes to an end, based on the current travel and medical advice.

As soon as travel and medical restrictions are lifted, audits shall be conducted as per the applicable standard.

4. Verification of Corrective Actions

- 4.1. If corrective actions for open nonconformities cannot be verified by other audit techniques the following rules apply:
- a. For suspended certificates, the suspension shall be prolonged until the verification of corrective actions can take place. The lack of verification of the corrective actions because of restrictions linked to COVID-19 shall not lead to the withdrawal of the certificate.
- As soon as travel and medical restrictions have been lifted, the verification of the actions shall take place by a site audit.
- b. For valid certificates which have open corrective actions, the verification deadline may be extended by a period of no more than six months, and then reviewed as the six-month period comes to an end, based on the current travel and medical advice.

As soon as travel and medical restrictions have been lifted, the verification of the actions shall take place by a site audit.

5. Informing SFI Inc.

- 5.1. The certification body shall immediately inform SFI Inc. of any changes affecting a certificate.