



# **GSA BAP SPS Remote Audit Policy**

Issue 1.2  
28-July-2021

## 1.0 Scope and Purpose

- 1.1 This policy describes the scope, eligibility, and procedures for a remote audit process under GAA-BAP Seafood Processing Standard (SPS) due to imposed international, domestic and company restrictions as a result of coronavirus (COVID-19) pandemic.
- 1.2 This policy is applicable to certified facilities and new applicants subject to approval by GAA-BAP.
- 1.3 The details presented herein provides guidance on remote audits to Certification Bodies (CBs) to ensure business continuity while maintaining the integrity of GAA-BAP Standards.
- 1.4 This policy is effective until imposed restrictions are revoked by governments and facilities within COVID-19 impacted areas and/or until notice from GAA-BAP.
- 1.5 GAA-BAP is continually monitoring the COVID-19 pandemic situation and will provide important updates as necessary to ensure program integrity.


## 2.0 Normative Documents<sup>1</sup>

- 2.1 IAF ID 3:2011\_Issue 1 Management of Extraordinary Events or Circumstances.
- 2.2 GAA Enhancement Document for IAF ID 3 Management of Extraordinary Events or Circumstances Affecting ABs, CBs and Certified Organizations (current version).
- 2.3 IAF MD 4:2018\_Issue 2 The Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes.
- 2.4 IAF ID 12:2015\_Issue 1 Principles on Remote Assessment.
- 2.5 ISO 19011:2018 Guidelines for auditing management systems, Third edition 2018-07.
- 2.6 GAA BAP Requirements for Certification Bodies offering Certification Against the Criteria of the Global Aquaculture Alliance (current version).
- 2.7 CBs internal policies and procedures for extraordinary events and for special/remote audits.
- 2.8 Addendum to GAA-BAP Remote Audit Policy – Enhanced Remote Audit Criteria (current version).

## 3.0 Facility Eligibility Requirements

- 3.1 The following facilities are NOT eligible for SPS remote audit consideration:
  - 3.1.1 Facilities that have had serious regulatory, food safety, environmental or social/worker safety incidents over the past year.
  - 3.1.2 Facilities with no history of GFSI benchmark certification.

<sup>1</sup> For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

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- 3.1.3 Facilities requiring a full re-audit.
- 3.2 The CB may consider exceptions to 3.1.2 for facilities owned and managed by organizations with good history of BAP, SPS, or equivalent GFSI benchmark certification.
- 3.3 Facilities not eligible for SPS remote audits can be considered for enhanced SPS remote audits per normative document 2.8.
- 3.4 All other facilities not falling under 3.1 can be considered for SPS remote audits.

## 4.0 Agreements and Restrictions

- 4.1 Only CBs fully approved by BAP are eligible to conduct remote audits.
- 4.2 Prior to the scheduling of a SPS remote audit the CB, facility and GAA-BAP shall mutually agree to the following conditions as they apply:
  - 4.2.1 To utilize a remote audit process in place of an onsite audit due only to constraints imparted to the audit process due to the COVID-19 pandemic.
  - 4.2.2 To utilize Information and Communication Technology (ICT) in accordance to IAF MD4 (normative document 2.3).
  - 4.2.3 To conduct mandatory risk assessments, request and provide essential documentation, schedule and attend meetings, conduct technology checks and document reviews, and develop and utilize an audit plan as prescribed in normative documents of Section 2 and in accordance to the SPS Remote Audit Timeline requirements stated Table 1.
- 4.3 All parties shall agree that the audit may be stopped by the auditor if ICT problems prevent the audit from being conducted in a timely manner, or if integrity of the audit is compromised. In such an event the CB and facility must plan and reschedule to complete the audit as soon as possible but not exceeding 30 calendar days after addressing the ICT concerns.
- 4.4 Facilities electing to receive a remote audit shall be capable of remote audits and in operation at the time of the audit. All parts of the facility and personnel shall be available for the remote audit process.
- 4.5 CBs shall retain the documentation, including the risk assessments pertaining to the COVID-19 restrictions that led to the use of this policy for AB and GAA-BAP reference, as needed.
- 4.6 The CB shall have a procedure/policy for retention of objective evidence including video or audio recordings beyond which these shall be deleted/disposed of per agreements with the facility.
- 4.7 GAA-BAP Program Integrity reserves the right to participate as an observer of remote audits conducted by CBs, including but not limited to real time and recorded ICT interviews, to assess the effectiveness of the remote audit process. The CB shall arrange technological access for this participation upon request.
- 4.8 GAA-BAP will withdraw the option for remote audits as soon as travel restrictions are eased and/or lifted when normal operations are restored.


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Table 1. SPS Remote Audit Timeline Requirements

Item	Time Prior to a Scheduled Remote Audit	Pre-Audit Requirement
i.	~ 3 Months	GAA-BAP shall work with the CB and facility to initiate the remote audit through the normal application process.
		<p>The auditor shall conduct a pre-audit meeting with the facility which shall include testing of ICT tools (ICT Check) to be utilized throughout all phases/parts/locations of the remote audit. The auditor shall test the ICT functionality at least 21 days prior to the audit.</p> <p>The ICT tools must be effective for two-way audio and video transmission under the following conditions:</p> <ul style="list-style-type: none"> <li>- from the plant office to the auditor.</li> <li>- from the processing and storage areas to the auditor.</li> <li>- from the external areas to the auditor.</li> <li>- from the translator to the auditor, if applicable.</li> </ul> <p>If communication to and from any of these areas is not reliable, the auditor shall contact the CB with notification of the deficiency. The CB shall determine based on the ICT check whether the audit may proceed, or whether improvements to ICT is required (e.g., increasing internet bandwidth, installing cell phone signal boosters in various locations). The audit start date may be adjusted outward if necessary, for such accommodation.</p> <p>Within the same time frame the auditor shall also verify that a back-up system is in place and functional. Back-up systems must include audit activities that can continue if the primary means of communication is not operable.</p>
ii.	At least 21 days	<p>The CB shall send an initial request to the facility for submittal of essential documents and responses to questionnaires for change in operations and outsourcing activities. The auditor shall work with the facility to determine the preferred method for document sharing/transfer to ensure confidentiality. (Note: The minimum documents that must be in transmittable form include all HACCP plans and records, all other records and all policies relating to the quality and food safety management systems). At a minimum required mandatory documents include:</p> <ul style="list-style-type: none"> <li>• HACCP plans for all products in the scope.</li> <li>• Detailed physical layout of facility (High/Low Risk/ areas), external grounds.</li> <li>• Process flow diagrams with CCPs marked.</li> <li>• Pest device map.</li> <li>• Instructions for testing the metal detector or X-ray machine.</li> <li>• Facility's audit Application.</li> </ul> <p>Other documents if available include:</p> <ul style="list-style-type: none"> <li>• Document register (list of all documents).</li> <li>• BAP SPS List of Outside Services document.</li> <li>• Laboratory test results for finished product testing per Annex 4.</li> <li>• The average annual concentrations for each variable for effluents that entered natural bodies of water from the facility during the last calendar year.</li> <li>• Electronic copy of the previous audit report.</li> </ul>

		The CB/auditor shall establish an access controlled shared on-line filing space with the facility as a document repository (e.g., the DOS System) in order to maintain efficiency in the file sharing and auditing process.
iii.	At least 14 days	The CB auditor shall obtain all initially requested documents that the facility is able to supply, either based on document availability and/or company policies. All parties shall agree that failure of the facility to supply requested documents may result in longer audit durations, for which the facility may be subsequently invoiced.
		The CB shall submit an approved risk assessment to GAA-BAP for acceptance.
iv.	Prior to Audit	The auditor shall provide an audit plan to the facility.

## 5.0 Risk Assessments


- 5.1 The CB shall conduct a risk assessment for each facility subject to a remote audit to determine the feasibility of whether a remote audit can take place.
- 5.2 Risk assessments shall address requirements in normative documents 2.1, 2.2 and 2.3, including, but not limited to the following:
  - 5.2.1 Whether audit objectives can be achieved by way of remote audits. If only part of the objectives can be achieved, the CB shall document other activities required to complete the audit and meet the objectives, specifying the method to do so and considering an enhanced remote audit or additional on-site visit when feasible.
    - 5.2.2 Availability of staff for the remote audit activities.
    - 5.2.3 Availability of documentation and records in appropriate forms for the sharing/transfer during the remote audit. Where a facility's records and documents system consist of paper records, separate documents, forms, notebooks and/or files, this information shall be scanned or otherwise transferred to a computer database or spreadsheet to allow for transmission and verification of electronic data.
    - 5.2.4 Activities needed to verify implementation of management systems.
    - 5.2.5 Access to IT systems that both, the CB and facility, will be able to use.
    - 5.2.6 Capability of facility staff to utilize technologies (ICT) used in remote audit techniques for production site audit and document/record reviews.
    - 5.2.7 Stable internet connection availability or any changes required by way of improvements to ICT tools (e.g., increasing internet bandwidth, installing cell phone signal boosters, Wi-Fi range extenders, Portable Satellite internet connections, etc.).
    - 5.2.8 The effect of remote audit on the audit duration.
    - 5.2.9 Feasibility of product and effluent sampling and testing.
      - 5.2.10 Significant changes to the facility's management system due to the extraordinary event.
      - 5.2.11 Effects of the extraordinary event on facility's internal audits, management reviews, and customer complaints, etc.
      - 5.2.12 Issues around supply of, and access to, raw materials, including packaging and other resources, which may require re-validation based on food safety concerns.

- 5.2.13 Necessary safeguards available to conform to legal and customer requirements related to confidentiality, security, and data protection.
- 5.2.14 Issues surrounding authentication/identification of interviewed people, verity of documents and records and other objective evidence.
- 5.2 Risk assessments may identify potential areas that may result in deficiencies due to COVID-19 (see 9.4 and 9.5 below). In such cases the CB shall evaluate whether the audit may continue and whether an onsite follow-up audit is expected to be required. The CB shall notify BAP in this regard.
- 5.3 Approved risk assessments shall be submitted to GAA for acceptance at least 2 weeks (14 calendar days) prior to the remote audit.

## 6.0 Auditor Qualifications and Assignments

- 6.0 If possible, remote audits should be conducted by BAP approved auditors who have conducted prior onsite SPS audits at the facility being audited.
- 6.1 If criteria 6.1 cannot be achieved, the CB shall assign an active GAA-BAP auditor who has audit experience with the same product and processes as the facility being audited.
- 6.2 If criteria 6.2 cannot be achieved, the CB shall assign active GAA-BAP senior auditors approved to conduct remote SPS audits.
- 6.3 If criteria 6.3 cannot be achieved, and the CB believes a non-senior auditor is qualified to conduct remote audits based on previous auditing experience, the CB can make a request in writing (with an accompanying audit log) for such consideration by GAA-BAP.
- 6.4 Due to the extraordinary circumstances of the COVID-19 pandemic the maximum use of an auditor (3-year consecutive audit rule<sup>2</sup>), will be considered on a case-by-case basis through communications between CBs and GAA-BAP.
- 6.5 The CB shall ensure auditors conducting remote audits are properly trained, including the use of ICT tools and risk/opportunities (see Normative Documents 2.3 and 2.4, and reference document ISO 9001 Auditing Practices Group Guidance on: REMOTE AUDITS Edition 1, 2020-04-16).
- 6.6 Shadow audits of CB auditors: (refer to section 3.7 in GAA-BAP CB Requirements document)
  - 6.6.1 The auditor in training can be part of the SPS remote audit where an assigned CB auditor is conducting the audit remotely using ICT tools.
  - 6.6.2 The auditor in training must have undergone the GAA-BAP Remote Auditor Training either administered by GAA-BAP or the CB.
  - 6.6.3 The CB and/or auditor scheduling shadow audits, that will be conducted remotely, must ensure that the ICT platform that will be used in the audit can accommodate all participants including the auditor in training.
  - 6.6.4 Both the lead auditor (assigned auditor to conduct the remote audit) and auditor in training must be part of the audit preparation.
  - 6.6.5 The auditor in training must adhere to all requirements of the shadow audit process as detailed in the GAA-BAP CB requirements document and the CB's own procedures.


<sup>2</sup> GAA-BAP CB Requirements Document section 3.10.

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- 6.7 Witness audits of CB auditors: (refer section 3.7 in GAA-BAP CB Requirements document)
  - 6.7.1 Witness audits that must be conducted remotely fall under two categories: 1) both auditors are remote, and 2) one auditor is onsite and another auditor is remote.
  - 6.7.2 The auditor performing the witnessing function must meet all criteria per the current GAA-BAP CB Requirements document section 3.11.
  - 6.7.3 The auditor being witnessed must have completed at least one shadow audit remotely in addition to the shadow audit criteria per the CB Requirements document prior to being witnessed.
  - 6.7.4 The auditor being witnessed is responsible for all aspects of the remote audit as stipulated in the CB Requirements document and GAA-BAP Remote Audit policy.
  - 6.7.5 The challenges of ICT with two auditors being present during the remote audit must be addressed and sorted out by the CB prior to the remote witness audit. This is important because the auditor witnessing not only has to observe what is being audited but also observe the auditor being witnessed.
- 6.8 Both auditors must abide by the facility confidentiality agreements, if any.
- 6.9 The reporting of both shadow and witness audits to GAA-BAP by the CB must conform to the criteria per GAA-BAP CB Requirements document.

## 7.0 Audit Duration and Planning


- 7.1 Remote audit duration decisions shall be in accordance with the current issue of the BAP CB Requirements document for SPS audits and shall be re-assessed by the CB prior to scheduling the remote audit based on risk assessments.
- 7.2 If a CB foresees a situation where audit duration is expected to exceed those specified in the CB requirements document and based on risk assessments, the CB shall contact GAA- BAP for guidance prior to the start of the remote audit.
- 7.3 Remote audits should not be conducted through a translator unless there is no other option. The auditor shall test ICT between the facility and the translator, and between the auditor and the translator prior to the audit. If communication to and from the translator is not reliable, the auditor shall contact the CB with notification of the deficiency.
- 7.4 Audit preparation and planning shall include the following considerations:
  - 7.4.1 The scope of the remote audit, correct issue of the standard and normative documents to be used.
  - 7.4.2 The facility size, products, species, processes, complexity, and language barriers.
  - 7.4.3 The facility activities, areas, information, and personnel to be involved in the remote audit.
  - 7.4.4 Requests for documentation/records prior to the audit, and accessibility thereof.
  - 7.4.5 Audit duration must be given due consideration during preparation, pre- audit and remote audit stages. Audit time spent between virtual site tour and document/record reviews may also need consideration.
  - 7.4.6 Development of a written audit plan to be shared with the facility, including tasks to be verified, personnel to be interviewed, timeframes, process reviews, breaks, sampling, etc.

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- 7.4.7 Planning for identifying and addressing issues regarding information that cannot be shared remotely due to confidentiality, accessibility, and other issues or concerns.
- 7.4.8 Planning shall seek to identify potential activities/clauses where audit objectives may be difficult to achieve (e.g. where verification requires touch and smell).
- 7.4.9 Available ICT tools, and those that appear optimal for use, including but not limited to: video conferencing, smart phones, drones, wearable video technology, screen sharing tools, other internet enabled means as deemed suitable by the CB (see IAF MD 4:2018 clause 4.2.3), and the extent to which ICT will be utilized. Identified ICT tools and back up if needed, shall be tested by both the CB and facility prior to the actual remote audit.
- 7.4.10 A review of the availability of quiet areas for worker interviews without noise and interruptions. Noise cancelling audio options may be considered. Auditors and the facility need to assure that their locations are free of extraneous sounds that may interfere with remote dialog. (Note: Consider that persons at the facility may be wearing masks which can further distort and muffle audio).
- 7.4.11 Remote audits must be executed by auditors and other involved persons (e.g. drone pilots, technical experts) with required training and experience to understand and utilize technology necessary for the audit.
- 7.4.12 Selection of sample audit data (e.g. offline, online) at both the facility and CB, for collecting, observing, and reviewing objective evidence.
- 7.4.13 Review of facility applications and self-assessments.
- 7.4.14 Review of audit reports, non-conformity reports and corrective action evidence from the most recent previous audits, where available and/or applicable.
- 7.5 CBs shall be provided specialized GAA-BAP SPS Remote Audit Checklist Tool as guidance for use when conducting remote SPS audits. This color-coded checklist will help in identifying which requirements may be audited by way of document/record review in an office setting and those that require virtual facility physical inspection/observation and interviews of facility staff or both.
- 7.6 Remote audits shall incorporate the use of synchronous ICT tools (e.g. real time video streaming, audio visual monitoring, screen sharing) to the extent possible to allow for observations in real time. When this is not possible, asynchronous ICT tools (time and date stamped video clips, photographs, pictures, screen shots, etc.) may be considered so as to achieve audit objectives and not to jeopardize the audit and program integrity. Risk assessments shall have identified these concerns.
- 7.7 Personnel interviews shall be planned and conducted using synchronous ICT tools (7.4 above). Interviews based on only audio shall be avoided.

## 8.0 Audit Process

- 8.1 CBs and auditors shall take precautions to ensure full integrity in the remote audit process. Remote audits must address the full scope of the GAA-BAP Standard and/or audit (e.g. certification, extension of scope).
- 8.2 All parts of the facility shall be included in remote audits; no exclusions are allowed during an audit.
- 8.3 CBs shall strictly follow the requirements stated in IAF MD 4 to ensure information security

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and confidentiality.

- 8.4 Audit duration in hours must be specifically noted in GAA-BAP audit reports. Deviations from agreed audit duration shall be stated.
- 8.5 The format of the audit process shall consist of all elements per SPS standard in accordance with ISO 19011 – opening meeting, site assessment (including dormitory and canteen, if applicable), collection of any necessary samples, worker interviews, review of management systems / records and procedures (including traceability/mass balance exercises), closing meeting, and provision of non-conformance summary to the facility.
- 8.6 The auditor shall use the pre-audit documents obtained from the CB to apply the “Guide for Collecting Video Evidence from Processing Plant and External Areas”.
- 8.7 Document and record reviews shall be done by video conferencing, online document sharing, and/or other means as deemed suitable by the CB (refer 5.2.3 above).
- 8.8 The facility manager or person in charge must remain present and/or available throughout the entire remote audit process (exception – personnel interviews must be conducted in private). Interviews shall be conducted in a noise free area without interruption.
- 8.9 Facility audit representative and workers’ identities shall be protected, and interviews shall be conducted in private by employing video calls/conferencing.
- 8.10 Facility and site physical tour/inspections shall be conducted by employing live video streaming (synchronous) to the greatest possible extent. If this is not possible, the CB shall assess the situation and either reschedule the remote audit or consider time stamped recorded videos taken during the remote audit by the auditee or CB technical person in case of enhanced remote audits. In all cases the CB/auditor must ensure integrity of the remote audit is not jeopardized.
- 8.11 If the remote audit cannot be completed due to technology breakdown/malfunction during the audit, the audit shall be rescheduled. The auditor shall immediately inform the CB, who will inform GAA-BAP. The audit may continue at a rescheduled date based on full agreement between the facility, CB and GAA-BAP. Such deviation must be stated in the audit report (see 4.3 above).
- 8.12 CBs and auditors shall determine whether product and/or effluent sampling and testing requirements can be satisfactorily fulfilled during the remote audit. Finished Product for sampling must be brought to an area of sufficient connectivity to be viewed in real-time video. Collection, preparation and packing of product samples should be documented by time stamped recorded video.
- 8.13 If fulfillment of such requirements is not possible due to COVID-19 restrictions, sampling may be deferred until normal operations can be restored.
- 8.14 Objective evidence obtained during the remote audit shall be logged and retained by the CB as deemed necessary. Any video or audio recordings as part of the objective evidence shall be obtained with the explicit consent/agreement with the facility and shall comply with IAF MD 4.

## 9.0 Reporting


- 9.1 Non-conformities identified by the auditor during the SPS remote audit shall be handled per BAP CB Requirements document (current version).

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- 9.2 The CB/auditor may accept the NC summary report signed electronically in lieu of physical signatures. Acknowledgement of NCs through electronic means is acceptable.
- 9.3 Corrective action evidence for closure of non-conformities shall be received and reviewed within the timeframe stated in the BAP CB Requirements document (current version).
- 9.4 During a remote audit, certain clauses may result in an NC due to extenuating circumstances as a result of COVID-19. Examples include collection and testing of samples, service providers not being allowed onsite, delays in receiving documents from service providers and licensing/permitting agencies, etc. In such cases CBs shall complete the closure of all other non-COVID-19 related NCs and technical reviews within the KPI timeline stated in the CB Requirements Document.
- 9.5 Once the remote audit has taken place, CBs shall ascertain whether any NCs identified during the audit are directly associated with restrictions imposed by COVID-19. If such NCs cannot be closed within the stated timeline, CBs shall proceed as below:
  - 9.5.1 The CB shall consider allowing the facility additional time to complete their root cause investigation and implement corrective action. If the CB determines that there are no overriding legal, social, environmental, food safety, animal welfare, or GAA program integrity concerns, the CB may grant additional time for the facility to close out such NCs, up to, but not exceeding 6 months from the date of the audit. If COVID-19 restrictions remain in effect after this timeframe, further preventing closure of NCs, the CB shall notify GAA-BAP.
  - 9.5.2 CBs shall notify GAA-BAP as to the status of NC disposition related to COVID-19 for consideration including but not limited to KPI adjustments, the severity of NCs attributed to the facility, NC closures, and reporting.
- 9.6 Audit reports shall be submitted in the same format as those used for on-site audits (BAP PORTal/Excel, as applicable).
- 9.7 The auditor/CB shall state "Remote Audit" on the audit report and corresponding checkboxes in BAP Portal as applicable.
- 9.8 Audit reports shall satisfy reporting requirements of IAF MD4:2018 clause 4.2.6 as to the types of ICT tools utilized and effectiveness of ICT to achieve audit objectives. These can be recorded in a table in individual Remote Audit Checklist Tools and in Portal. Examples include: "database records", "email correspondence", "telephone interviews conducted", "video calls/skype", "screenshots viewed", etc.

## 10.0 Certificate Issuance, Content and Validity

- 10.1 If NCs related to COVID-19 restrictions remain open within 1 week of the normal NC closure timeframe KPIs stipulated by existing BAP Program requirements, a certificate may be issued on a conditional basis that the NCs shall be closed within the terms of additional time granted by the CB per 9.5.
- 10.2 CBs shall issue a new certificate based on a successful outcome of the remote audit.
- 10.3 Certificate expirations shall be handled per the current issue of the CB Requirements document.

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