Update Concerning BAP Remote Auditing Approach for Group Facilities Facing COVID-19-Related Travel Restrictions

Based on observations to date on 3rd party audits, remote audits add additional risks to the BAP certification program depending on varying factors. Such risks have been mitigated by standardizing the way remote audits must be conducted and providing as much oversight as possible. Thus, any allowance for Group internal audits to be performed remotely must adopt similar considerations to minimize such risk. This includes writing/updating policy, guides, and training for both Group organizations and CBs to ensure audit and program integrity. To maintain alignment with remote audit policies developed for CBs, BAP has accepted to provisionally allow facilities already certified under the GAA-BAP Group Program to conduct internal audits remotely under the following criteria:

1. If audits cannot be performed onsite due to national or local regulations pertaining to COVID-19 restrictions, remote internal auditing processes will be permitted for Group Program facilities, but only under the additional requirements that are described below as Amendments to the normal BAP Farm and Hatchery Group Program Policy. Documentation concerning such locally-mandated travel restrictions must be submitted to GAA Program Integrity as verification. This policy will remain in effect on a case-by-case basis until imposed restrictions are revoked by governments within COVID-19 impacted areas and/or until notice from GAA-BAP. Under exceptional circumstances BAP may also consider allowing use of remote internal audits, where national or domestic restrictions prohibiting onsite audits have been revoked and/or do not exist but where facilities have implemented self-imposed restrictions due to corporate management policies for biosecurity and/or personnel safety (community spread of COVID-19).

2. Risk assessments for each facility using the BAP Remote Audit Risk Assessment Checklist (RT1) must be submitted to GAA Program Integrity for acceptance, prior to the internal remote audits occurring.

3. Group entities shall submit Facility Group Manager, FGM Assistants, and Internal Auditor qualifications to GAA Program Integrity for consideration and approval. Internal remote audits conducted by auditors not approved by GAA shall not be accepted. Qualifications shall include training on internal auditing and verification that the FGM, Assistant FGM's, and Internal Auditors have received training in the use of Information and Communication Technology (ICT) tools using both IAF MD4 and the GAA BAP Training Course for Remote Audits.

4. GAA Program Integrity or other BAP staff including Country Coordinator contractors shall have the right to participate as an observer in internal audits conducted remotely, and Group entity shall arrange the necessary communication links to enable such participation.

5. Remote internal audit reports shall be submitted by the Group entity to GAA Program Integrity upon request.

The above criteria will be made a part of published GAA remote auditing policies and are applicable to all organizations currently enrolled in the BAP Group Program.
1.7 Adding and Removing Member Sites

BAP will recognize an exception to the process described in clause 1.7.4 for adding New Member Sites, when specifically requested by a Group entity, and only with the express written approval of BAP:

1.7.4.1 A successful external CB audit of a site against the applicable BAP Farm/Hatchery Standard as a stand-alone facility or as a member of a cluster during the last calendar year (or during the last production cycle if completed within the last three years in the case of salmon farms) can be substituted for the required initial Group internal audit.

1.7.4.1.1 Evidence of prior certification must accompany all such requests.

1.7.4.1.2 Because certification renewal dates associated with already-certified prospective Group members will often be different from the recertification date of the Group, certificate cycles for such new Group members will need to be adjusted in conformity with the BAP “Changes Affecting a Certification Cycle” policy.
2.5 Personnel

2.5.1 Facility Group Manager (FGM) Qualifications, Training, and Functions

2.5.1.1.7 If due to Extraordinary Events or Circumstances (as described in IAF ID 3:2011) it is agreed between the Group entity and BAP that remote internal auditing processes must be used, prior to the start of such audits, the FGM shall first become familiarized in the use of Information and Communication Technology (ICT) tools, by studying IAF MD 4:2018 and participating in the GAA BAP Training Course for Remote Audits.

2.5.1.2.1 When a Group consists of member facilities that are in the same country and the distances create a barrier to the FGM's effective management and enforcement of the requirements of the program, the Group entity shall appoint and train additional personnel to function as assistants to the FGM.

2.5.1.2.2 Such assistants shall be located in the region near to the facilities for which they are responsible. They shall report to the FGM and shall assist the FGM to manage, oversee, enforce and train Group members and Internal Auditors regarding the requirements of the BAP Group Program.

2.5.2 The Group's Internal Member Site Auditor(s) (Qualification and Training) (See also 4.1.3)

2.5.2.2.5.1 If due to Extraordinary Events or Circumstances (as described in IAF ID 3:2011) it is agreed between the Group entity and BAP that remote internal auditing processes must be used, prior to the start of such audits, the Internal Auditors shall first successfully complete a training program by the FGM in the use of Information and Communication Technology (ICT) tools, including both IAF MD 4:2018 and the GAA BAP Training Course for Remote Audits.

2.5.2.2.6.1 If it becomes necessary to use remote auditing processes as described above, prior to conducting such audits on their own, internal auditors shall conduct at least 1 remote internal audit under the supervision of the FGM before being approved to conduct remote audits independently. Additional remote audits under the supervision of the FGM shall be conducted where proficiency is not demonstrated.

2.5.2.2.6.2 The Group entity shall submit to BAP proof that internal auditors have completed the required qualification process, and approval from must be
obtained from BAP before allowing the auditors to conduct remote audits on their own.

3.3 Internal Member Site Audits

3.3.1.1 If formal approval has been granted by BAP for the Group to proceed with remote internal audits, risk assessments shall be prepared for each member site using the BAP Remote Audit Risk Assessment Checklist (RT1), and the risk assessments shall be submitted to programintegrity@bapcertification.org for review and acceptance prior to the scheduling and conducting of the remote audit.

*Note to Groups concerning use of the RT1 form: Although wording in the form was originally addressed to CB’s, Groups must use the BAP RT1 template for all Risk Assessments. No other format may be substituted.*

3.3.1.2 Copies of all remote internal audit reports shall be submitted by the Group entity to BAP upon request.

3.3.1.3 BAP Program Integrity or other staff or contractors assigned by BAP shall have the right to participate as silent observers in internal audits conducted remotely, and the Group entity shall arrange the necessary communication links to enable such BAP participation.

3.3.3.1 In cases where BAP has approved the use of remote internal auditing, such audits shall be performed and documented in a manner consistent with the guidance provided by BAP in the Remote Audit Checklist Tools which have been developed for each facility type for this purpose, and which must be obtained by written request from BAP, together with the Remote Audit Checklist Tool Use Guidance developed by BAP concerning use of the checklists.