GAA-BAP Remote Audit Policy

1.0 Scope and Purpose

1.1 This policy describes the scope, eligibility, and procedures for a remote audit process under GAA-BAP Programs 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

2.1 IAF ID 3:2011_Issue 1 Management of Extraordinary Events or Circumstances.

2.2 IAF MD 4:2018_Issue 2 The Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes.

2.3 IAF ID 12:2015_Issue 1 Principles on Remote Assessment.


2.5 GAA BAP Requirements for Certification Bodies offering Certification Against the Criteria of the Global Aquaculture Alliance (current version).

2.6 CBs internal policies and procedures for extraordinary events and for special/remote audits.

2.7 GAA-BAP Remote Audit – Facility Eligibility Requirements (current version).

3.0 Facility Eligibility for Remote Audits

3.1 Refer current version of GAA-BAP Remote Audit – Facility Eligibility Requirements.

4.0 Agreements and Restrictions

4.1 Only CBs fully approved by BAP are eligible to conduct remote audits.

4.2 The CB, GAA-BAP and facility shall mutually agree to utilize a remote audit process and the use of Information and Communication Technology (ICT) due to constraints associated with the current COVID-19 pandemic.

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1 For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.
4.3 Facilities electing to receive a remote audit shall be in operation at the time of the audit. All parts of the facility and personnel shall be available for the remote audit process.

4.4 GAA-BAP will withdraw the option for remote audits as soon as travel restrictions are eased and/or lifted when normal operations are restored.

4.5 CBs shall retain the documentation 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.

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. Risk assessments shall include, among other factors identified in Normative documents 2.1 and 2.2, the following:

- Availability of staff
- Availability of documentation and records in electronic form
- Activities needed to verify implementation of systems
- Access to IT systems that both, the CB and facility, will be able to use
- Capability of facility staff to utilize technologies (ICT) used in remote audit techniques.

5.2 Risk assessments may identify potential areas that may result with 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.

6.0 Auditor Qualifications and Assignments

6.1 If possible, remote audits should be conducted by BAP approved auditors who have conducted prior onsite audits at the facility.

6.2 If criteria 6.1 cannot be achieved, the CB shall assign active GAA-BAP senior auditors approved to conduct remote audits.

6.3 If neither 6.1 nor 6.2 can 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), 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 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 these shadow audits must ensure that the ICT platform that will be used in the audit can accommodate more than one individual since some ICT applications have inbuilt restrictions on the number of participants that can log in simultaneously.

   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.

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

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2 BAP CB Requirements Document clause 3.10.
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 the type of facility being audited and shall be re-assessed by the CB prior to scheduling the remote audit.

7.2 If a CB foresees a situation where audit duration is expected to exceed those specified in the CB requirements document the CB shall contact GAA-BAP for guidance and obtain written consent prior to the start of the audit. In situations where the duration of the remote audit process takes less time than that of an on-site audit, the CB/auditor must provide justification and record this in the audit report.

7.3 Audit preparation and planning shall include the following considerations:

7.3.1 The scope of the remote audit, standard and normative documents to be used.
7.3.2 The facility size, products, processes, complexity, and language barriers.
7.3.3 The facility activities, areas, information, and personnel to be involved in the remote audit.
7.3.4 Requests for documentation/records prior to the audit, and accessibility thereof.
7.3.5 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, etc.
7.3.6 Planning for identifying and addressing issues regarding information that cannot be shared remotely due to confidentiality, accessibility, and other issues or concerns.
7.3.7 Planning shall seek to identify potential activities/clauses where audit objectives may be difficult to achieve.
7.3.8 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 shall be tested by both the CB and facility prior to the actual remote audit.
7.3.9 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.
7.3.10 Selection of databases (e.g. offline, online) at both the facility and CB, for collecting, observing, and reviewing objective evidence.
7.3.11 Review of facility applications and self-assessments.
7.3.12 Review of audit reports, non-conformity reports and corrective action evidence from the most recent previous audits, where available and/or applicable.

7.4 CBs shall be provided with specialized GAA-BAP Remote Audit Checklist Tools for each standard as guidance for use when conducting remote audits.
7.5 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.) shall then be considered.
7.6 Personnel interviews shall be 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 and confidentiality.
8.4 Audit duration in hours must be specifically noted in GAA-BAP audit reports. Deviations from agreed audit durations shall be stated.
8.5 Document and record reviews shall be done by video conferencing, online document sharing, and/or other means as deemed suitable by the CB.
8.6 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).
8.7 Facility audit representative and workers’ identities shall be protected, and interviews shall be conducted in private by employing video calls/conferencing.
8.8 Facility and site physical tour/inspections shall be conducted by employing video streaming (synchronous) to the greatest possible extent. If this is not possible, time stamps on recorded videos shall be considered.
8.9 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.
8.10 CBs and auditors shall determine whether product and/or effluent sampling and testing requirements can be satisfactorily fulfilled during the remote audit. If fulfillment of such requirements is not possible due to COVID-19 restrictions, sampling may be deferred until normal operations can be restored (see 9.5).

8.11 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 remote audit shall be handled per BAP CB Requirements document (current version).

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:

A. The CB shall consider allowing the facility additional time to complete their root cause investigation and implement their 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.

B. 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”, “screnhots 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.