

September 2020 Covid-19 Pandemic Derogation – Requirements and guidance

Versions published

Version no.	Date published	Description of amendments
1	2 September 2020	N/A
2	13 October 2020	Additional guidance added to FAQ (questions 15, 16, 17, 22, 23, 24).

For fisheries and CoC:

- 1.1 The CAB shall determine whether any of the following Covid-19 related factors prevent an on-site audit/assessment:
- National or local travel restrictions that impact the assessment team or certificate holder.
 - Health risks of conducting an in-person audit/assessment to anyone involved in the audit process.
 - Certificate holder or CAB company policies.

Guidance 1.1

National or local travel restrictions can refer to guidance or legislation that has been issued by a governmental or regulatory body at either national, regional, or local level. This can be where travel is banned completely or where there are quarantine rules in place that make travelling and conducting audits/assessments impractical. Travel restrictions can be relevant to the location of the audit/assessment, the locations where audit/assessment team members or certificate holders reside and would be travelling to and from to attend the audit, locations where audit/assessment team members or certificate holders would transit through to reach the audit location. The health and welfare of those involved in the audit/assessment process is paramount so if risks are identified or policies mean that on-site audits/assessments are not allowed then these can be included as reasons not to conduct on-site audits/assessments.

- 1.2 The CAB shall conduct audits/assessments according to requirements in the Fisheries Certification Process (FCP) and Chain of Custody Certification Requirements (CoCCR) where the factors listed in 1.1 do not prevent an on-site audit/assessment.
- 1.3 Where any of the factors from 1.1 are identified, the CAB shall:

For fisheries:

- 1.3.1 Conduct surveillance audits, expedited audits, scope extension assessments or reassessments remotely.
- 1.3.2 Submit a variation request (as per GCR 4.12) to the MSC to conduct initial assessments remotely.
- 1.3.3 Include information relating to the factors listed in 1.1 which prevent an on-site initial assessment in the variation request.
- 1.3.4 Include a comprehensive risk assessment for conducting the initial assessment remotely in the variation request.
 - 1.3.4.1 The CAB shall include, as a minimum, the risks listed in [Table 1](#) and how risks identified will be mitigated.



1.3.5 If the MSC accepts the variation request, the CAB may conduct the initial assessment remotely.

1.3.5.1 The CAB shall request an additional peer reviewer from the Peer Review College when implementing FCP 7.14.

Table 1: Areas of risk to be included in risk assessment (1.3.4.1)

Risk areas	Key risks
<p>Sufficient information to enable an effective and robust fishery assessment process and comprehensive assessment against the MSC Fisheries Standard</p>	<p>Ability to verify information remotely – please refer to Table G1 for more information.</p>
	<p>Ability to engage with stakeholders, deliver a robust stakeholder consultation process and conduct interviews with stakeholder. Please refer to FCP 4.2, GFCP 4.2, and 7.16.</p>
	<p>Ability to gather information and carry out stakeholder consultations if the Risk Based Framework (annex PF) is being used to assess data-deficient PIs. Please refer to PF2.3, PF3.2, PF3.3.2, PF4.1.5.b.ii, PF4.2, PF7.2, PF8.2, PF8.4.1, PF8.5.1, PF8.6.1 and PF8.7.1.</p> <p>Other relevant references: FCP 7.10.2.m.</p>
	<p>Availability of information - FCP 7.10.2.h requires CABs to indicate the availability of information used to score each PI and to highlight potential information gaps. If the CAB identifies a large number of information gaps in the ACDR the CAB should consider if a remote site visit will be sufficient to obtain the necessary information.</p> <p>Please refer to the interpretation ‘Clarifications relating to the Announcement Comment Draft’ which provides the MSC’s intent behind draft scoring ranges, identification of information gaps to inform site visits and stakeholders consultation: “The MSC’s intent is that the ACDR provides indicative scoring and rationales, and identifies where more information is needed. One of the objectives of the ACDR is to assist the site visit by facilitating stakeholder input to the assessment prior to the site visit, and to ensure the CAB, the client and stakeholders are better informed and prepared for the site visit...”</p> <p>CABs should consider the risk of an off-site initial fishery assessment if any Performance Indicator has a draft scoring range of <60 reported in the ACDR.</p>
	<p>Ability to understand the context, scale, and intensity of the fishery operations.</p>
	<p>Availability of information and communication technology (ICT).</p>



Sufficient communication capability to effectively plan, conduct interviews and facilitate information sharing as per IAF ID 4: 2018 .	Competency of assessment teams, auditees, and stakeholders in using ICT . Please refer to IAF MD 4:2018
	Ability to clearly exchange information between the assessment team, prospective fishery client and stakeholders and to be understood by all parties when parties speak different languages.
	Ability to schedule remote site visit activities at reasonable mutually convenient times when parties are located across different time zones.

Guidance to Table 1

Table G1 provides guidance on assessing information availability and ability to verify information remotely. Table G1 is adapted from Table G10 in FCP v2.2.

Table G1: guidance on assessing information availability and ability to verify information remotely

	Ability to verify remotely is low (high risk)	Ability to verify remotely is high (low risk)
Client and stakeholder input	Electronic forms of communication and other mechanisms to engage with clients and stakeholders (such as video conferencing, phone conferencing, email, phone) are absent, limited or inefficient and ineffective in providing the information required for an audit in the particular circumstances of the fishery.	There are ample opportunities and mechanisms to engage with clients and stakeholders including electronic forms of communication, such as videoconferencing phone conferencing, email and phone. The mechanisms are effective in the particular circumstances of the fishery.
Fishery reports, government documents, stock assessment reports and/or other relevant reports	Fishery reports and other types of reports required for the assessment against the MSC Fisheries Standard are not available publicly and cannot be transmitted electronically. There is no remote access to the information and there are no, or very limited, other sources available to triangulate and confirm status of the fishery with respect to the MSC Standard.	Fishery reports and other documented evidence that can be used to assess performance against the MSC Fisheries Standard can be easily and transparently checked remotely, due to such information being available publicly, such as being available on a website or having been widely distributed and made publicly available to several stakeholders. The reports can be transmitted electronically, and veracity easily confirmed.
Information appropriate to determination of Principle 1 and Principle 2 information requirements (see Guidance to the MSC Fisheries Standard)	Information from electronic monitoring of position, observer data, logbooks, fisher interviews, dockside monitoring etc. is required but cannot be	Where information from electronic monitoring of position, observer data, logbooks, fisher interviews, dockside monitoring etc. is

	easily transmitted to a remote auditor in a form that can be easily interpreted.	required to verify performance against the MSC Fisheries Standard, this information is available to be transmitted electronically to auditors in a form that can be easily interpreted.
Transparency of the management system	Level of transparency of information by management is low such that information about performance of the fishery is generally not easily nor widely available.	There is a high level of transparency in management, such that information on the fishery is widely and publicly available or known to the wider group of stakeholders. Any information provided on the fishery can be easily verified.
Vessels, gear or other physical aspect of the fishery	The assessment requires inspection of vessels or other physical aspects of the fishery during the audit and there are no reliable mechanisms for verifying these aspects of the fishery from a remote location.	The assessment does not require investigation of physical aspects of the fishery or there are reliable mechanisms to enable verification of these aspects from a remote location.

For CoC:

- 1.3.6 Conduct surveillance or re-certification audits/assessments remotely.

Guidance 1.3.6

CFO follow up visits can also be conducted remotely but are not considered as audits, so have not been included in the requirement.

- 1.3.7 Conduct initial audits remotely only where the CAB has received the signed contract for the audit before the period of this derogation begins (28 September 2020).
 - 1.3.7.1 The remote initial audits should be conducted no later than 3 months after the signed contract has been received by the CAB.

Guidance 1.3.7

Generally, initial audits cannot be conducted remotely under the terms of this derogation. Interim certification can be considered for Chain of Custody audits (following CoCCR 6.2.4–7). The only exception to these rules, for CoC, are those certificate holders that meet the requirements for remote auditing as per CoCCR 7.1.6.1.

- 1.3.8 The CAB should not conduct consecutive audits of the same certificate holder remotely.

Guidance 1.3.8

The only exception to these rules, for CoC, are those certificate holders that meet the requirements for remote auditing as per CoCCR 7.1.6.1 or 11.3.3. If this is required, a variation would need to be submitted as per GCR 4.12.

- 1.3.9 The CAB shall follow CoCCR 11.2.5 for scope extensions.

Guidance 1.3.9

Scope extensions to initial audits can be conducted remotely if the CAB has assessed that there is not a significant change/risk that has been introduced by this extension. For example, if the certificate holder is a trader but wishes to add processing to their scope, this would be considered an increased risk and require an on-site audit.

For fisheries and CoC:

- 1.4 The CAB shall conduct remote audits in alignment with [IAF MD 4:2018](#) (IAF Mandatory Document for the Use of Information and Communication Technology for Auditing/Assessment Purposes, considering security/confidentiality and process requirements).
- 1.5 The CAB should ensure that remote audits/assessments replicate on-site audits/assessments as far as practicably possible.

Guidance 1.5

The CAB should plan audits/assessments to ensure that the remote audit/assessment does not result in a drop of quality and thoroughness in comparison with an on-site audit/assessment. For example, by requesting as many relevant documents prior to the audit/assessment, being able to conduct a factory tour, interviewing sufficient staff in production, etc.

- 1.6 The CAB shall document in the assessment announcement and the assessment/audit report the information relating to the factors listed in 1.1 which have prevented an on-site audit.

Guidance 1.6

For CoC this should be entered in the 'General' tab of the checklist under 'Audit type' and then 'Other – please specify' section. For fisheries this should be entered in the site visit sections of the announcement template and the reporting template.

- 1.7 The CAB shall maintain a list of certificate holders where this derogation has been applied and shall make this available for MSC or ASI on request.
- 1.8 The CAB shall request a variation (as per GCR 4.12) for any situation that differs from the requirements listed in this derogation.

FAQs and further guidance

CoC and Fisheries:

1. Will the justification on remote auditing be auditable by ASI? E.g. if a CAB justifies a restriction is in place and then audits remotely, can ASI say that it wasn't sufficient and raise an NC?

Justification must be provided, but this will be checked by ASI for completion, rather than findings being raised on the content (e.g. on-site audit conducted due to health risks).

2. What types of information on travel restrictions, health risks and CAB/certificate holder policies need to be documented?

Examples of information on travel restrictions can include links to government websites or company policies. As fishery assessment/audit announcements and reports are publicly available, specific details on health risks do not need to be, and should not be, included in the report.

3. What happens if travel restrictions and/or health risks change between announcing the audit/assessment and conducting the audit/assessment?

In consideration of travel restrictions changing rapidly in response to increasing cases of Covid-19, if the Fishery or CoC audit is announced or planned to be conducted remotely due to restrictions in listed in 1.1, the audit can still be done remotely, even if travel restrictions and/or health risks change. For fisheries, if the audit has been announced as on-site, but will instead be conducted remotely, an announcement should be made to inform stakeholders as appropriate.

However, if an initial audit is planned to be completed on-site, and closer to the date, travel restrictions prevent this from happening, CABs shall complete a variation request to alternatively complete the audit remotely.

CoC:

4. Can a certificate have an additional 3-month extension if it was already extended in the previous derogation?

No, up to 6 months was allowed during the previous derogation but no additional extensions will be permitted. Consideration should be made if the certificate holder needs to be suspended or cancelled if there are ongoing difficulties conducting an audit. Certificate holders that have not already had an extension are still eligible for the 90 days as per CoCCR 11.4.2.

5. What shall we do if there is a local outbreak which means that not even remote audits can be conducted?

The MSC will continue to monitor the situation and may grant variations to consider certificate extensions for impacted areas.

6. What do I do if I have an applicant who wants their initial audit done remotely?

This is not allowed under the new derogation.

Initial audits were allowed to be conducted remotely in the height of the pandemic but, with restrictions lifting, the decision has been made that initial audits need to be done on-site. Initial audits are seen as having increased risks associated with them as an auditor may not have visited the site.

GSSI have also developed guidance on how to manage audits during this pandemic and are not allowing initial audits to be conducted remotely. Interim certificates are still allowed (subject to meeting CoCCR 6.2.4–6.2.7) but this will require an on-site audit within 90 days.

The only exceptions to this are for companies that meet the requirements for CoCCR 7.1.6.1 and scope extensions for certificate holders who have only been audited initially.

7. What should CABs do where certificate holders have stated that financial reasons/lack of orders are preventing them from having or paying for an audit?

The pandemic has been a challenging situation for everyone, and we have a lot of sympathy for the struggles that companies are facing. However, the MSC does not consider this to be a valid reason for extending certificate or audit timings as per the conditions of the derogation. It is not possible for a CAB to assess the financial circumstances of a certificate holder and determine what is an appropriate financial reason for not having an audit. For lack of orders, the Standard allows audits to be conducted where MSC products are not available by assessing an equivalent or similar product so would not be seen as a valid reason for not having the audit.

Where clients have failed to pay for their audit, they can be suspended as per GCR 7.4.1. The MSC would recommend that either the certificate holder remains suspended indefinitely until payment has been received or that the certificate be cancelled.

8. What requirements are in place for remote audits?

CABs shall follow the requirements of IAF MD4:2018: “The use of information and communication technology (ICT) for auditing/assessment purposes” as a minimum. The MSC will also be reviewing whether additional guidance is needed to support the existing documents provided on the CAB extranet and MSC website (msc.org).

9. Will remote audits still be allowed for ongoing auditor maintenance?

Remote audits can be considered as part of the ongoing observations as per CoCCR Section 6, Table 1. However, for any new auditors, remote audits will only be considered by variation.

10. What do we do for the next audits for certificate holders who have had their timelines extended or been conducted remotely during the previous derogation?

We are aware that postponing of audits may have caused a backlog of audits. We would expect that the scheduling remains in the control of the CABs and to try to minimise the impacts on certificate holders of having multiple audits in close proximity to one another. If there are any particular concerns, this can be discussed with the MSC and variations may be considered.

If a certificate holder had their audit conducted remotely during the period of the previous derogation, we would expect that the next audit is conducted on-site (unless they are eligible for remote audits as per CoCCR 7.1.6.1 or 11.3.3).

11. What are the rules around certificate transfers in this period?

There are no limitations to certificate transfers and the rules in the GCR will need to be met. The MSC will monitor the number of transfers to ensure that certificate holders are not moving to CABs who are only offering remote audits as an option.

12. Can CFO follow up visits be conducted remotely?

Yes, these can be done remotely.

13. Can CABs change the audit schedule due to the pandemic?

The audit schedule should be followed as per the CoCCR. The MSC and ASI will monitor audits to ensure they are scheduled within the parameters of the usual audit cycle. In particular we will monitor if audits are brought forward significantly to be done inside the period of the derogation. Any trends will be reviewed and may lead to additional assessments of CABs.

14. What should CABs do about unannounced and short-notice audits in this period?

Where it has been determined that the certificate holder can only be audited remotely it will not be possible to conduct unannounced or short notice visits. Where the restrictions referenced in the derogation are not a factor then unannounced and short notice visits can be considered. The MSC will not expect strict adherence to CoCCR 11.3.2 in this period.

15. **(NEW – October 2020)** How should internal audits against the MSC CoC Group Standard be handled during the derogation period?

The answer to this can be split into those groups that are yet to be certified/initial audits and those that are already certified.

For initial group certification – Internal audits shall be done on-site except for sites in the group that meet one of the following criteria (as per 6.4.1.1 of the group standard):

- only handle certified products in sealed containers
- do not physically handle certified products
- handle certified seafood exclusively

Those sites in the group that meet the criteria above can have their internal audit done remotely.

For already certified groups – Internal audits can be conducted remotely for adding new sites to the group (as per 6.2.3 of the Group Standard) or for annual internal audits (as per 6.4.5). Those sites that meet the criteria of 6.4.5.a or 6.4.5.b do not need any sort of internal audit.

16. **(NEW – October 2020)** If a certificate holder wants to add a non-certified contract processor or re-packer during the period of the derogation, do they need to be visited on-site?

Adding a non-certified contract processor or re-packer is considered to be of similar risk level to an initial audit. This means that the expectation is that they will still need to be visited on-site and CABs need to follow section 8.4 in the MSC CoC Certification Requirements. The MSC may consider variations to this requirement if submitted by the CAB.

17. **(NEW – October 2020)** If a single or multisite certificate holder wants to add a site to an existing certificate does the audit need to happen on-site?

During the period of this derogation, if there is a Covid-19 related factor (as per 1.1 a-c of this document) which prevents an on-site audit taking place then a new site can be added remotely. If there are no Covid-19 related factors which need to be considered, then these sites should be added by an on-site audit as per 11.2.11 of the MSC CoC Certification Requirements.

Fisheries:

18. Which FCP requirements are impacted by this [current Covid-19 pandemic derogation, September 2020](#)?

During the effective period of the Covid-19 pandemic derogation, September 2020, the following Fisheries Certification Process (FCP v2.2) requirements which relate to on-site audits do not apply if the factors listed in clause 1.1 of the Covid-19 pandemic derogation, September 2020 derogation prevent an on-site surveillance audit, expedited audit, scope extension assessment or reassessment.

Clause (FCP v2.2)	Text	Comment
7.28.3.a	The following types of surveillance audit are available: a. On-site audit. The audit involves face-to-face engagement with the client, conducting stakeholder interviews and a review of changes in management and science in the fishery.	CABs can conduct off-site surveillance audits under the Covid-19 September 2020 derogation.
7.29.3	An expedited audit can be an off-site audit or on-site audit, based on what the CAB determines necessary.	CABs can conduct off-site expedited audits under the Covid-19 September 2020 derogation.
PE1.2.4.2	The CAB shall conduct the scope extension either during an on-site assessment or during a regular on-site surveillance audit.	CABs can conduct scope extensions as off-site assessments or during regular off-site surveillance audits under the Covid-19 September 2020 derogation.
7.30.3	When undertaking a reassessment of a certified fishery, the CAB shall apply all the steps of the FCP version effective at the time of the announcement of the reassessment.	7.16 (full assessment site visits) is implicitly referred to by 7.30.3. CABs can conduct off-site reassessments under the Covid-19 September 2020 derogation.
7.30.13	A reduced reassessment shall follow the full reassessment requirements, except that: <input checked="" type="checkbox"/> a. The CAB may undertake the assessment with 1 team member on-site and other team member(s) working from 1 or more remote location(s).	CABs can conduct remote/off-site reassessments under the Covid-19 September 2020 derogation.

19. Can CABs conduct remote site visits for surveillance audits, expedited audits, scope extensions and reassessments?

If any of the factors listed in clause 1.1 are identified, CABs can conduct remote site visits for surveillance audits, expedited audits, scope extensions and reassessments in accordance with the derogation.

20. Can CABs conduct remote site visits for initial assessments?

If any of the factors listed in clause 1.1 are identified, CABs can submit a variation request to conduct a remote site visit in accordance with the derogation. The MSC will review variation requests on a case by case basis.

21. What should a CAB do if a remote initial site visit was announced and conducted prior to the Covid-19 pandemic derogation, September 2020 becoming effective (28 September 2020)?

Due to the increased risk of conducting remote initial assessments, the MSC's intent is that assessment reports are reviewed by an additional peer reviewer. This is stated in [1.3.5.1](#). The MSC's intent applies when CABs have announced and conducted a remote initial assessment under the previous derogation prior to the effective date of superseding Covid-19 pandemic derogation (28 September). If the Client and Peer Review Draft Report has not yet been submitted for Peer Review (FCP 7.19.3), the CAB should contact the Peer Review College and request an additional peer reviewer.

22. If a CAB announced a remote initial site visit prior to the Covid-19 pandemic derogation, September 2020 becoming effective (28 September 2020) but it has not yet been conducted, does the CAB need to submit a variation request to conduct the initial assessment remotely?

No, if a remote initial assessment was announced under the previous derogation prior to the effective date of superseding Covid-19 pandemic derogation (28 September) the CAB does not have submit a variation request to conduct the site visit remotely.

Due to the increased risk of conducting remote initial assessments, the MSC's intent is that assessment reports are reviewed by an additional peer reviewer. This is stated in [1.3.5.1](#). The MSC's intent applies when CABs have announced a remote initial assessment under the previous derogation prior to the effective date of superseding Covid-19 pandemic derogation (28 September). The CAB should contact the Peer Review College and request an additional peer reviewer.

23. **(NEW – October 2020)** How will the costs of the additional peer reviewer be covered?

The Peer Review College will provide a peer reviewer with either 'Level 1' or 'Level 2' MSC experience, but with the best possible local/regional knowledge of the fishery in assessment, regardless of the size of the fishery (number of Units of Assessment). The CAB/client will only be expected to cover the cost of the additional peer reviewer at the lower 'Level 1' rate, regardless of whether a Level 1 or Level 2 peer reviewer is assigned. Where Level 2 peer reviewers are assigned the MSC will subsidise the additional costs of the Level 2 peer reviewer.

24. **(UPDATE- October 2020)** Does the entire team need to attend an on-site audit for initial assessment?

The Covid-19 pandemic derogation, September 2020 instructs CABs to submit a variation request if an initial assessment cannot be conducted on-site due to Covid-19 restrictions ([1.3.2](#)). This also applies if some members of the assessment team cannot attend the initial assessment site visit.

This approach aligns with FCP G7.16 and an existing interpretation on the topic of [team members being on site for an initial assessment](#).

G7.16 Site visit: team attendance ▲

The full assessment team should attend all the meetings at the site visit. Where this could cause unreasonable cost or inconvenience, and where the assessment would not be adversely affected by some team members participating remotely, the CAB may submit a variation request.

The [interpretation](#) refers to existing guidance to the FCP (G7.28.4 and 7.28.6 Verification of information) for determining surveillance levels based on the ability to verify information remotely.

Extract from [team members being on site for an initial assessment](#) interpretation:

"...the ability to verify information remotely –see Guidance FCP v2.1/v2.2, 7.28.4 and Table G13/G10 for surveillance audits. For example, if there are ample opportunities and mechanisms for communication with all stakeholders (e.g. videoconferencing, Skype) then the ability for the team members not present to participate and verify information remotely is high. If, however, means to communicate with the clients and stakeholders are absent, limited or inefficient and ineffective in providing information required for the assessment (e.g. carrying out a SICA with a stakeholder group with no means for some team members to participate actively in the discussion), then the

ability to verify information is low and the MSC would be unlikely to grant a variation request for team members to participate remotely”.

CABs should refer to and follow the guidance and interpretation.

Update: An additional peer reviewer is required when a variation request is granted for initial audits (as per 1.3.5.1), if part of the assessment team will attend the site visit on-site, then an additional peer reviewer is needed when:

- The majority of the assessment team is off-site (i.e. the number of assessment team members off-site is greater than the number of assessment team members on-site) an additional peer reviewer is needed.
- There are an equal number of assessment team members on-site and off-site and the team leader is off-site an additional peer reviewer is needed. (If the team leader is on-site additional peer review is not needed).

25. How far in advance should CABs submit variation requests to conduct initial assessment site visits remotely?

GCR 4.12 sets out the process for submitting variation requests. CABs should submit variation requests as far in advance as possible. The MSC has up to 14 days to review and respond to variation requests, which includes an internal sign-off process.

26. Can audit and assessment activities and timelines be extended under the new derogation?

No. If there are delays to audit and assessment activities and timelines due to the impacts of Covid-19, CABs may submit a variation request (as per GCR 4.12) to request extensions. The MSC considers variation requests on a case by case basis.

27. What information/evidence should be submitted to justify variation requests to delay and/or extend audit and assessment activities and timelines?

The MSC expects CABs to provide a clear description of the cause of delays, with supporting evidence where possible. For example, if there are delays in obtaining information from fishery clients or stakeholders, the CAB should identify the information impacted by the delay, the parties involved in providing that information and, if possible, an indication of when that information might become available.

28. How far in advance should CABs submit variation requests relating to delays/extensions to audit and assessment activities and timelines?

GCR 4.12 sets out the process for submitting variation requests. CABs should submit variation requests as far in advance as possible. The MSC has up to 14 days to review and respond to variation requests, which includes an internal sign-off process.

29. Are the timelines that were extended under the derogation effective 27 March 2020 to 27 September 2020 still applicable?

The audit and assessment activities and timelines that were extended during the Covid-19 derogation from 27 March to 27 September 2020 are unaffected by this derogation.

30. Can CABs still suspend fishery certificates?

Yes, GCR 7.4 still applies during the 6-month derogation period (28 September 2020 – 27 March 2021).



31. Will the effective dates for the Fisheries Certification Process v2.2 be delayed?

No. The effective date for FCP v2.2 remains 25 September 2020. The implementation date for the UoA definition remains 25 March 2023.

32. How are objections affected by the derogation?

The independent adjudicator will consult with the parties to the objection to determine the best way to proceed in light of the Covid-19 outbreak. There is a possibility that the adjudication hearing will be held remotely.

33. Will the participation of fishery auditors-in-training in remote assessments be accepted as the fulfilment of the qualification requirements for new auditors?

Yes, unless it is not possible to verify competencies during a remote audit.

End of document
