



MSC COVID 19 Guidance for CoC holders - remote auditing v1

In our communication of 30 March 2020 we advised you that, in response to the COVID-19 pandemic, your Chain of Custody audits may be carried out remotely until 27 September 2020. The derogation can be found [here](#). This will affect many companies for whom all prior audits have been onsite, and we therefore have created this follow on communication to help explain what a remote audit could mean to you.

The intention of this document is to provide general information about the impact of the derogation on Chain of Custody (CoC) Certificate holders. CoC certificate holders should continue to ask questions about the impact of this derogation on them directly to their Conformity Assessment Body.

Version table

Version	Effective date	Description of amendment	Affected section/ page
1	20 May 2020	N/A – new document	N/A

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Preparing for the audit

Remote audits will always be announced and the date known in advance, so there will be time to prepare for the audit. In order to ensure an effective remote audit, the CAB may ask you to email more information in advance than you normally would for an onsite audit – for example an organisation chart, a process flow diagram or even sections of the audit checklist populated. The auditor will send you an audit plan which defines the date of the audit, its start time and estimated times for its various parts.

Participating in the audit

Remote audits will cover all the requirements of an onsite audit, for reference these are explained in the [CoC Certification Requirements v3.1](#) sections 7, 8 & 9. The way evidence is provided may vary depending on the technology you and your auditor has access to. As a minimum it is essential that relevant documents, records and images can be provided to the auditor and relevant people spoken to by the auditor on the day of the audit. There will be the following parts to an audit:

- **Opening and closing meetings:** Relevant personnel with responsibility for compliance with the standard need to be available on telephone or video call for the opening and closing meeting, and for other parts of compliance review as requested by the auditor. Where video technology is not available the auditor may request photographs of the meetings.
- **Interviews:** As with an onsite audit, personnel in all areas of work that relate to certified product need to be available for interview. This extends beyond those in management positions. These interviews can be done by telephone or video call. The auditor may select these people from the organisation chart and may ask for a copy of their employee ID for the audit record.
- **Document and record review:** As with an onsite audit, compliance to some requirements is demonstrated through records and documents, such as training records. This includes the records for the traceability test and input-output reconciliation which, the auditor will select on

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- the day of the remote audit. The relevant documents and records need to be sent to the auditor by email, or shown to the auditor by screen sharing, on the day of the audit.
- **Seeing product in-situ:** The auditor will need to see product at the various stages of storage and production. This can be shown via a video connection or where this is not possible photographs taken on the day of the audit may be sent by email.

MSC has provided specific guidance to CABs on remote CoC audits which you can find [here](#).

Post audit activities

The post audit activities described in the [CoC Certification Requirements section 9 and 11](#) such as audit checklist completion, corrective action confirmation and, where relevant, certification decision are unchanged.

Delays to audits

In specific circumstances where the COVID-19 outbreak makes a remote audit impossible, such as when a site is forced to close, the CAB may determine to postpone your audit up to 6 months whilst still maintaining your certificate status as valid.

Onsite audits

Until 27th September 2020, onsite audits will only be conducted if you and your CAB agree this is the best course of action. For example, if you are both operating in a region that is not impacted by the COVID-19 outbreak at the time of the audit.

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