

VLOG Guidelines for Conducting Remote Audits During the Coronavirus (SARS-CoV-2) Pandemic

Dear Sir or Madam,

As noted in our information letter of 16 March 2020, audit dates may be postponed at the discretion of the respective certification body, due to the spread of the coronavirus (SARS-CoV-2).

In light of the continuing crisis, we would like to let you know that VLOG **will permit remote audits in areas with contact or exit restrictions due to the Corona crisis for certain businesses and types of audits, starting immediately**. Businesses can receive regular certification under the VLOG Standard through such remote audits. This document provides the associated requirements, restrictions and general conditions.

The introduction of remote audits aims to avoid postponement of VLOG audits and the related capacity problems for certification bodies, to make sure business VLOG certifications don't expire and VLOG audits will not need to be delayed until next year.

If local conditions and the requirements of businesses and certification bodies permit, VLOG audits may still be conducted on-site. On-site audits are preferable to remote audits.

This regulation takes effect upon release of this document and applies until further notice. The possibility of performing remote audits only applies during the corona crisis and is limited to the period of the contact lockout. VLOG will review the current restrictions on a regular basis and notify all system participants of the resulting changes.

Ms Käbe (c.kaebe@ohnegentechnik.org) and Ms Kreitner (f.kreitner@ohnegentechnik.org) are available to answer any questions you may have on remote auditing and the VLOG certification process in general.

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1. What are VLOG “remote audits”?

“Remote audits” are defined as VLOG audits that are held with the aid of information and communication technology (ICT) (e.g., via phone, teleconference, video call or videoconference). Facility tours that are mandatory (see Table section 2) and/or absolutely essential to check on requirements and/or to check the implementation of corrective measures may also be held using ICT (a digital tour of the facility) or on-site.

Remote audits can be divided into sequential sub-sections, which occur at different times. For example, the process can be designed as follows:

1. First contact and clarification of technical possibilities
2. Request for documents by the certification body
3. Examination of documents
4. (Live) audit interview by phone/video (including a digital tour of the facility, if necessary)
5. Final discussion.

All types of audits under VLOG Standard V20.01, Chap. A 3.1, can generally be conducted as remote audits. The table in the following section shows whether and under which conditions a remote audit (particularly a digital tour of the facility) of a particular business is feasible.

2. For which VLOG stages are remote audits permissible?

The following table describes, on which stages and under which conditions regarding the company tour distance audits are made possible by VLOG. Nevertheless, the certification body (for individual companies) can decide against the performance of distance audits and insist on an on-site audit. This decision must be justified and documented.

VLOG stage/sub-stage		Is a (digital) tour of the facility necessary?	Is a remote regular audit feasible?	Is a remote initial audit feasible?
Trade (incl. Private Labelling)	Including storage/handling of bulk goods, including bulk goods subject to compulsory labelling	No, but recommended ¹	Yes	Only with a (digital) tour of the facility
	Including exclusive storage/handling of bulk goods not subject to compulsory labelling	No	Yes	Yes
	Pure drop shipping	No	Yes	Yes
Storage/handling	Storage/handling of bulk goods, including bulk goods subject to compulsory labelling	No, but recommended ¹	Yes	Only with a (digital) tour of the facility
	Exclusive storage/handling of bulk goods not subject to compulsory labelling	No	Yes	Yes
Transport		No	Yes	Yes
Feed production	Production entirely not subject to compulsory labelling	Yes, mandatory	Yes	Only with a (digital) tour of the facility
	Dual production (goods that are subject to compulsory labelling and goods that are not)	-	No	No
Mobile grinding and mixing facilities		No	Yes	Yes
Matrix organisation Logistics and Feed		No	Yes	Yes

¹ If deviations in the separation of the flow of goods were detected during the previous audit, a digital tour of the facility is mandatory.

VLOG stage/sub-stage		Is a (digital) tour of the facility necessary?	Is a remote regular audit feasible?	Is a remote initial audit feasible?
Agriculture	Businesses in Risk Category 0 with no feed subject to compulsory labelling at the VLOG site	No	Yes	Only with a (digital) tour of the facility
	Businesses with a feed switch in the VLOG operating unit	Yes, mandatory	Yes	Only with a (digital) tour of the facility
	Businesses with feed subject to compulsory labelling, which cannot be swapped, at the site	Yes, mandatory	Yes	Only with a (digital) tour of the facility
	Businesses with feed subject to compulsory labelling, which can be swapped and is handled with the same installations/feeding equipment/machines used for “ohne Gentechnik” feed manufacturing is present at the site	Yes, mandatory	Yes	No
	Businesses that cannot be classified into the above areas	No	Yes	Only with a (digital) tour of the facility
Agricultural Group Organisation		No	Yes	Yes
Livestock Trade/ Animal transport	Pure paper trading/only transport from A to B	No	Yes	Yes
	Including storage/handling of animals	No, but recommended ²	Yes	Yes
Food processing	Risk Category 0	Yes, mandatory	Yes	Only with a (digital) tour of the facility
	Risk Category 1	Yes, mandatory	Yes	No
	Risk Category 2	Yes, mandatory	Yes	No
Retail	Group organiser	No	Yes	Yes
	Branch	Yes, mandatory	Yes	Only with a (digital) tour of the facility

² If deviations in the separation of the flow of goods were detected during the previous audit, a digital tour of the facility must be made.

3. Which requirements/prerequisites must the certification body meet?

- For businesses that were audited remotely in 2020, the next audit must be conducted in the first quarter of 2021 (or in the first or second quarter of 2022 or 2023 if there is a 2-3 year audit interval).
- As soon as regular on-site audits can be resumed nationwide and VLOG discontinues the option of conducting remote audits, the certification body must conduct an on-site facility tour for at least 2% of the businesses that were audited remotely and document the findings on the VLOG checklist. The certification body will select the businesses on the basis of risk.
VLOG will publish the deadlines and details for implementing this requirement no later than the date on which it discontinues remote audits.
- Remote audit requirements for certification bodies, auditors, evaluators and certifiers are the same as for on-site VLOG audits (see [VLOG Guidelines for Certification Bodies, Auditors, Evaluators and Certifiers](#)).
- The certification body must supplement its control procedures to include remote audits and provide VLOG with a description of the procedure for performing remote audits – for informational purposes – no later than the day of the first remote audit. The VLOG maintains itself the right to comment and supplement the description of the procedure afterwards if necessary.
- The certification body must document all VLOG audits conducted as remote audits in a monthly overview. This overview at a minimum has to contain the following information:
 - Name of business (name of location, if necessary)
 - Business address/location
 - Stage and sub-stage
 - VLOG ID or sub-VLOG ID
 - Type of audit (initial audit, regular audit...)
 - Note as to whether a (digital) tour of the facility took place
 - Date of audit

The overview must be sent to VLOG at qualitaet@ohnegentechnik.org by the 15th of the following month at the latest.

4. How must VLOG remote audits be conducted?

In general, it is the certification body's responsibility to develop and implement a control procedure that utilises remote audits. The following items must be taken into consideration:

- Suitability analysis: Before the audit, the certification body must, together with the business, determine whether remote audits are feasible.
 - The technical capability of the business must be ascertained (Internet connection, ability to hold telephone or web conferences, and infrastructure to support the use of information and communication technology)
- Data protection: For remote audits in Germany the requirements of the German General Data Protection Regulation (GDPR) or in the case of VLOG audits abroad, the respective national data protection requirements must be followed.
- Scope of the audit:

- The audit must cover all the necessary components as listed in VLOG Standard V20.01, Chap. A 3.7.
- All requirements for the respective audit type prescribed by the VLOG Standard must be checked.
- The audit must include a live interview conducted by the auditor with the business (at least by telephone).
- Only the tour of the facility may be omitted, if necessary (see Item 2 for prerequisites) or may be performed digitally.
- Digital tour of the facility:
 - Digital facility tours must follow a layout plan/operating plan for the business, which was sent to the auditor in advance.
 - The auditor, not the audited business, will determine the areas and systems to be inspected as well as the level of detail for the inspection.
 - The auditor will document which areas and systems of the business were inspected.
- Audit documentation:
 - Remote audits are documented with the current VLOG checklist(s).
 - Remote audit must be marked as such on the checklist (type of audit: “remote audit”).
 - The documentation must specify whether a (digital) tour of the facility was made and which areas/systems were checked. Alternatively, reference may be made to the layout plan/operating plan in which the inspected areas/systems were documented. This file must be uploaded to ECERT together with the other audit documents.
- Confirmation of the audit report: The audited business must confirm the audit report and any deviations noted – either with a signature (scan or photo) or by e-mail.