

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

**In acute or ongoing crisis situations with official contact or exit restrictions/recommendations (e.g. pandemics, animal epidemics<sup>1</sup>), VLOG permits remote audits for certain business and types of audits.**

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footline  
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Due to remote audits businesses can receive regular certification under the VLOG Standard so that certifications don't expire and VLOG audits will not need to be delayed until next year. 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,~~

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If local conditions and the requirements of businesses and certification bodies permit, VLOG audits have to be conducted on-site during the ongoing crisis situation.

~~On-site audits are preferable to remote audits.~~

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~~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.~~

**In any case the permission for performing a remote audit must be requested in advance from VLOG (see chapter 3).**

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<sup>1</sup> VLOG does not generally classify avian influenza as a crisis situation, as it occurs annually in the same period. As in previous years, VLOG audits of poultry farms should be performed from April to September.

## 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, 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?
<b>Trade (incl. Private Labelling)</b>	Including storage/handling of bulk goods, including bulk goods subject to compulsory labelling	No, but recommended <sup>2</sup>	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
<b>Storage/handling</b>	Storage/handling of bulk goods, including bulk goods subject to compulsory labelling	No, but recommended <sup>2</sup>	Yes	Only with a (digital) tour of the facility
	Exclusive storage/handling of bulk goods not subject to compulsory labelling	No	Yes	Yes
<b>Transport</b>		No	Yes	Yes
<b>Feed production</b>	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
<b>Mobile grinding and mixing facilities</b>		No	Yes	Yes
<b>Matrix organisation Logistics and Feed</b>		No	Yes	Yes

<sup>2</sup> 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?
<b>Agriculture</b>	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
<b>Agricultural Group Organisation</b>		No	Yes	Yes
<b>Livestock Trade/ Animal transport</b>	Pure paper trading/only transport from A to B	No	Yes	Yes
	Including storage/handling of animals	No, but recommended <sup>3</sup>	Yes	Yes
<b>Food processing</b>	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
<b>Retail</b>	Group organiser	No	Yes	Yes
	Branch	Yes, mandatory	Yes	Only with a (digital) tour of the facility

<sup>3</sup> 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?

- A distance audit must always be approved in advance by VLOG. The certification body obtains the approval of VLOG before performing a distance audit by providing the following information to [qualitaet@ohnegentechnik.org](mailto:qualitaet@ohnegentechnik.org):
  - Name of business (name of location, if necessary) incl. VLOG ID or sub-VLOG ID
  - Stage and sub-stage
  - Type of audit (initial audit, regular audit...)
  - Note as to whether a (digital) tour of the facility can take place or not
  - Reason for remote audit
- For businesses that were audited remotely in 2020, the next audit must be conducted on site until the end of **first** third quarter of 2021 **the following year** (or in the first or second quarter of 2022 or 2023 if there is a same for 2-3 year audit interval). | changed
- ~~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.~~ | deleted
- 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:~~ | deleted
  - ~~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](mailto: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.
  - Only the tour of the facility may be omitted, if necessary (see Item 2 for prerequisites) or may be performed digitally.
  - 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).
- 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 VLOG database 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.