



SFI Inc. Guidance Regarding Audit Restrictions Due to COVID-19

Due to the spread of COVID-19 in the United States, Canada and internationally, travel and medical restrictions may impact SFI auditing activities. In order to give some flexibility to certification bodies and Program Participants impacted by these restrictions, SFI Inc. is issuing the following guidance.

The main methods to ease the consequences of travel restrictions are the implementation of remote audits, and where this is not sufficient, the extension of time periods affecting the certificate. This guidance is based on SFI Sections 2, 3, 4, 6 and 9, International Accreditation Forum (IAF) documents and ISO 19011.

This guidance enters into force and can be applied by certification bodies from the day of its publication (March 12, 2020) and is applicable until SFI Inc. revokes the guidance.

Reference documents

- SFI Section 2: SFI 2015-2021 Forest Management Standard
- SFI Section 3: SFI 2015-2021 Fiber Sourcing Standard & Appendix 1 Rules for Use of the Certified Sourcing
- SFI Section 4: SFI 2015-2021 Chain of Custody Standard
- SFI Section 6: Part 14. SFI 2015-2019 Chain of Custody Standard and SFI On Product Label Use
- SFI Section 9 – Audit Procedures and Auditor Qualifications and Accreditation
- IAF Informative Document on the Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations (IAF ID 3: 2011 - Issue 1)
- IAF Mandatory Document for the Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes (IAF MD 4:2018 - Issue 2)
- ISO 19011:2018 Guidelines for auditing management systems

Guidance

1. General procedures for the application of this guidance

- 1.1 The certification body should establish a documented policy and process, outlining the steps it intends to take in case that a Program Participant is impacted by COVID-19 related restrictions. The policy and process can cover either an affected Program Participant (e.g. a manufacturing plant, forest lands) forced to curtail activities due to the risks to the workforce, or customers of such a Program Participant forced to adjust its supply chain dynamics.
- 1.2. This documented policy and process should include an assessment of the risks of continuing certification.
- 1.3. Each case should be evaluated and documented by the certification body to provide evidence whether, and to what extent, the Program Participant is impacted by COVID-19 related restrictions.

- 1.4. The certification body also needs to consider the risks related to cases where planning/conducting of the audit is not easy because reaching the Program Participant's facilities or ownership may be difficult or inadvisable for the auditor (e.g. restrictions because of national or local rules, health risks, flight cancellations, etc.)
- 1.5. The provisions outlined in this guidance only apply to Program Participants who are impacted by the COVID-19 event, according to the evaluation conducted by the certification body. They do not apply in any other case.

2. Initial and re-certification audits

- 2.1. Generally, recertification audits shall not be replaced by remote audits.
- 2.2. For recertification audits which cannot proceed as scheduled, the validity of certificates may be extended by a period of no more than three-months, and then reviewed as the three-month period comes to an end, based on the current travel and medical advice.
- 2.3. For Program Participants a with SFI Chain of Custody certificate that operate without physical possession, re-certification audits may be conducted remotely in accordance with IAF MD 4. The certification body shall demonstrate that the full scope of the audit can be covered using ICT tools.
- 2.4. For Program Participants with SFI Chain of Custody or Fiber Sourcing Appendix 1 certification who have not sold any product with a SFI Inc. claim since the last audit, the recertification audit may be conducted remotely using other audit techniques.
- 2.5. Scheduled Initial certification audits impacted by COVID 19 restrictions should be postponed until the certification body can conduct an on-site audit.
- 2.6. As soon as travel and medical restrictions are lifted, audits shall be conducted as per the applicable standard and any other applicable procedures. For any recertification audit which does not take place once the travel restrictions have been lifted, the certificate shall be suspended.

3. Surveillance audits

- 3.1. Program Participants with a SFI Chain of Custody or a Fiber Sourcing Appendix 1 certificate who can demonstrate they have not sold any materials with an SFI claim since their last audit can have the surveillance audit waived.
- 3.2. The surveillance audit can be conducted remotely using other audit techniques, such as documentation and records review, technology, etc. where:
 - a. the certification body has sufficient confidence in the Program Participant's compliance with the standard(s) criteria, and
 - b. no nonconformity was raised during the previous audit or
 - c. the corrective action for the nonconformity can be verified by other audit techniques.

- 3.3. If the surveillance audit cannot be replaced by other audit techniques according to 3.2, the surveillance audit can be extended by a period of no more than three months, and then reviewed as the three-month period comes to an end, based on the current travel and medical advice.

As soon as travel and medical restrictions are lifted, audits shall be conducted as per the applicable standard.

4. Verification of Corrective Actions

- 4.1. If corrective actions for open nonconformities cannot be verified by other audit techniques the following rules apply:

a. For suspended certificates, the suspension shall be prolonged until the verification of corrective actions can take place. The lack of verification of the corrective actions because of restrictions linked to COVID-19 shall not lead to the withdrawal of the certificate.

As soon as travel and medical restrictions have been lifted, the verification of the actions shall take place by a site audit.

b. For valid certificates which have open corrective actions, the verification deadline may be extended by a period of no more than three-months, and then reviewed as the three-month period comes to an end, based on the current travel and medical advice.

As soon as travel and medical restrictions have been lifted, the verification of the actions shall take place by a site audit.

5. Informing SFI Inc.

- 5.1. The certification body shall immediately inform SFI Inc. of any changes affecting a certificate.