GLOBALG.A.P. Full Remote

ENGLISH VERSION 6.0_SEP22

VALID FROM: 1 OCTOBER 2022
OBLIGATORY FROM: 1 JANUARY 2024
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1 INTRODUCTION

This document describes the GLOBALG.A.P. Full Remote audit procedure. It is not applicable for Integrated Farm Assurance (IFA) v6 GFS (see “GLOBALG.A.P. general regulations – Rules for certification bodies,” section 7.7).

a) GLOBALG.A.P. Full Remote is an emergency procedure that may be temporarily allowed by the GLOBALG.A.P. Secretariat in cases where force majeure (e.g., war, pandemic outbreak, natural disaster) makes on-site CB audits impossible. The duration and applicability (scope) of the procedure will be set by the GLOBALG.A.P. Secretariat and linked to the specific event. The use of GLOBALG.A.P. Full Remote outside of the scope defined by the GLOBALG.A.P. Secretariat is prohibited. The GLOBALG.A.P. Secretariat reserves the right to terminate its validity with appropriate notification.

b) GLOBALG.A.P. Full Remote covers recertification, certificate scope extension, transfer, etc. based on fully remote audits. Initial certification is not covered. GLOBALG.A.P. Full Remote is applicable to all GLOBALG.A.P. standards except the GFSI-recognized standards. Further private standards and benchmarked scheme owners may choose whether to adopt the GLOBALG.A.P. Full Remote procedure.

c) Unless otherwise specified in this document, the respective rules of the given standard and/or add-on apply.

d) Whenever GLOBALG.A.P. Full Remote has been used to issue a certificate or to extend the scope of an existing one, this shall be clearly indicated to inform all market participants or the public (whichever is applicable as per the relevant data access rules) that the certificate or the extension is based on remote audits (see section 3 e) below).

e) GLOBALG.A.P. Full Remote also applies to all GLOBALG.A.P. add-ons as per approval by the add-on owner. See “GLOBALG.A.P. Full Remote – List of auditable add-ons.” The GLOBALG.A.P. Secretariat will continuously update this list in case additional add-on owners decide to join the GLOBALG.A.P. Full Remote procedure. If an add-on CB audit is conducted based on the GLOBALG.A.P. Full Remote procedure, this is added as a product attribute in the GLOBALG.A.P. IT systems and is visible to GLOBALG.A.P., the CB, and the respective add-on observers.

f) GLOBALG.A.P. Full Remote is to be implemented for all principles and criteria (P&Cs), similar to an on-site CB audit.

2 TERMINOLOGY

For the sake of simplicity, in this document:

- Whenever the term “CB auditor” is used, it shall refer to a CB farm auditor, CB QMS auditor, or CB assessor.

- Whenever the term “CB audit” is used, it shall refer to a CB farm audit, CB QMS audit, or assessment.

- Whenever the term “certificate” is used, it shall refer to a certificate, letter of conformance, certificate of conformance.

- Whenever the term “producer(s)” is used, it shall refer to persons (individuals) or businesses (companies, individual producers, or producer groups) that are legally responsible for the production processes and the products of the respective scope, sold by those persons or businesses, as well as to Chain of Custody or Compound Feed Manufacturing companies.
Whenever the term “general regulations” is used, it shall refer to the GLOBALG.A.P. general regulations and/or the relevant add-on’s general rules. Whenever specific rules are referred to, they are identified by including the name of the particular standard or add-on.

The terms “certified producer” and “certified producer group member” will be used. However, producers and producer group members are not certified but their production processes are certified.

Whenever the term “member/site” is used, it shall refer to individual members of a producer group and/or individual production sites of a multisite producer, respectively.

3 GENERAL

a) GLOBALG.A.P. Full Remote applies only when official travel or gathering restrictions are in place in the country or region where the CB audit shall take place or there is a company policy of the CB or of the producer that is based on an official or reputable source (e.g., the company restricts travel to/from regions identified as high-risk by its national ministry of foreign affairs or the World Health Organization or governmental “requests for citizen cooperation”). The CB shall keep evidence of the emergency status to justify the use of this procedure.

b) GLOBALG.A.P. Full Remote includes 1) a documents and records review, which may be performed offline or online, similar to the off-site stage as defined in the GLOBALG.A.P. general regulations; and 2) a virtual meeting to check all requirements that would normally need to be reviewed on-site and could not be answered during 1) and also to verify the consistency of records reviewed in 1). Both 1) and 2) are conducted remotely using ICT and may be performed as a unit or in two (or more) separate parts, as decided by the CB.

c) The document review and virtual meeting shall not be performed more than four weeks apart. These four weeks shall also include the planning and testing of the ICT used for the remote audit.

d) During the registration process, the CB shall collect information and verify that the producer has the necessary infrastructure to support the use of the ICT proposed for the remote audit. Records shall be kept.

e) The use of GLOBALG.A.P. Full Remote shall be identified clearly in the CB audit report (including the producer’s risk level) and on the certificate in the GLOBALG.A.P. IT systems.

f) GLOBALG.A.P. Full Remote may result in a negative certification decision not only due to the relevant provisions described in the general regulations but also if the credibility (integrity) of the remote audit is jeopardized (see sections 4 and 5).

g) In the case of recertification, if the certificate validity has not been extended, the registered products shall be reregistered by the CB in the GLOBALG.A.P. IT systems for the new certificate.

h) If the producer has already asked for a certificate validity extension and the CB has accepted the certificate extension and the new certificate, the producer is not allowed to change CBs unless the outgoing CB allows the transfer.
i) The CB shall classify the producers participating in GLOBALG.A.P. Full Remote according to the risk of issuing a certificate based on this procedure:

   (i) Not eligible:
   - More than 10 non-conformances (Major Must P&Cs or QMS) were identified during the last two consecutive CB audits (including announced, unannounced, surveillance, and remote audits) for a certificate holder on the date of the CB audit. In the case of an Option 2 producer group or Option 1 multisite producer with QMS, the non-conformances shall be calculated as follows:
     - QMS level: more than 10 non-conformances (QMS)
     - OR
     - Member/site level: more than 10 non-conformances at any of the producer group members selected during CB sampling
   - A producer was classified as “high-risk” when certified using GLOBALG.A.P. Full Remote in the previous certificate and no follow-up on-site CB audit has been conducted (i.e., a high-risk producer shall not be certified for a subsequent certificate based only on GLOBALG.A.P. Full Remote without an follow-up on-site CB audit).
   - A producer is new (i.e., has never been certified to a GLOBALG.A.P. standard or had a GLOBALG.A.P. certificate that expired more than 12 months ago).

   Producers in any of the cases described above shall require an on-site CB audit to be certified.

   (ii) High-risk:
   - A “medium-risk” producer was certified using GLOBALG.A.P. Full Remote for the previous certification.
   - A Chain of Custody company packs/repacks and labels/relabels products directly or via a subcontractor, and/or a company takes physical possession of bulk products bought directly or via a subcontractor.
   - When the GRASP evaluation is conducted together with IFA or an equivalent standard and the producer is classified as high-risk, GRASP shall also be classified high-risk.

   (iii) Medium-risk:
   - A producer with non-conformances identified during the last on-site CB audit (both for main certificate or the add-ons) on the date of the CB audit is seeking recertification.
   - A producer changes CBs. If the new CB cannot verify that during each of the last two on-site CB audits no more than 10 non-conformances (Major Must P&Cs or QMS) were identified for the certificate holder, the producer shall be classified as “not eligible.”
   - A producer has had only one previous CB audit performed on-site.
   - A producer’s certificate expired less than 12 months ago.
   - A “low-risk” producer adds GRASP during the validity of an ongoing certificate for the first time.
• A GRASP producer has any overall assessment result other than “fully compliant.”
• A Chain of Custody company takes physical possession of packed and labeled products directly or via a subcontractor.
• A low-risk producer was certified using GLOBALG.A.P. Full Remote in the previous certificate.

(iv) Low-risk:
• A producer with no non-conformances identified during the last on-site CB audit.
• A GRASP producer has the previous overall assessment result “fully compliant.”
• A Chain of Custody trader/broker has no physical possession of the certified products.

(v) Add-ons that need to be added during the certificate validity of an ongoing certificate will follow the risk classification of the main certificate, excluding the GRASP-specific risk classification defined above.

(vi) If a GRASP assessment is performed using the GLOBALG.A.P. Full Remote procedure, the GLOBALG.A.P. Full Remote interview protocol of the GRASP general rules in its current version shall be used together with this procedure.

j) For GLOBALG.A.P. Remote, the full final CB audit report, including the checklist, shall be made available to the GLOBALG.A.P. Secretariat. Any information relating to natural person (e.g., names or data clearly linkable to responsible persons or any other workers) shall not be entered in the public part of the checklist. The checklist shall always be uploaded through AOH following the current AOH upload rules.

k) All CB audit timing requirements defined in the general regulations apply unchanged unless otherwise indicated in this document.

l) The overall duration for remote audits shall not be less than the duration defined in the respective normative documents, where applicable. Common practice indicates that remote audits require additional time.

m) The CB shall justify and record if no additional time was required for the remote audit.

n) GLOBALG.A.P. Full Remote audits shall be performed only by finally approved CBs and not by provisionally approved CBs. The CB auditors shall be approved for the relevant standard, scope, and add-on. It is not possible to approve a CB and/or CB auditor only for GLOBALG.A.P. Full Remote audits.

o) In the case of a subsequent CB audit (except in the case of a transfer between CBs) and/or a certificate scope extension, the CB shall use the same auditor who performed the previous audit for the remote audit. Exceptions from this rule are allowed on a case-by-case basis by the GLOBALG.A.P. Secretariat. Contact standard_support@globalgap.org. Resource constraints are not a valid reason for being granted an exception to this rule.

p) The document review and the virtual meeting of GLOBALG.A.P. Full Remote shall be performed by the same CB auditor(s).
q) For plants scope:

“For GLOBALG.A.P. general regulations – Rules for plants scope,” section 2.3 f): If the product handling unit (PHU) already has a post-farm gate food safety certification recognized by GFSI for scope BII “Farming of grains and pulses” and/or BIII “Preprocess handling of plant products” (www.mygfsi.com), the GLOBALG.A.P. approved CB auditor shall audit, as a minimum, segregation and traceability, as well as postharvest treatments, using GLOBALG.A.P. Full Remote for this PHU. In cases of doubt, the CB can reaudit all other applicable P&Cs.

(i) If the PHU is subcontracted and does not have a valid GLOBALG.A.P. IFA or PHA certificate, a remote audit of the PHU shall be performed as well.

r) GLOBALG.A.P. Full Remote may be used for witnessing CB auditors remotely (for initial sign-off, for transfer of auditors between CBs, and for maintenance of CB auditor competency). In the case of initial sign-off and transfer of auditors between CBs, the CB shall conduct a follow-up physical on-site witness audit of the CB auditor within the next 12 months or the CB auditor shall lose their approval until a physical on-site witness audit can be conducted. In the case of maintenance of CB auditor competency, the CB shall conduct a follow-up physical on-site witness audit of the CB auditor within the next 24 months or the CB auditor shall lose their approval until a physical on-site witness audit can be conducted. For the remote witness audit, the CB auditor being witnessed may be present on-site or remotely.

s) For initial sign-off of CB auditors, GLOBALG.A.P. Full Remote may be used for the mandatory observation of audits prior to the witness audit. For the remote witness audit, the observing CB auditor may be present on-site or remotely.

t) Exceptions for maintenance of CB auditor competency or for the requirements for the annual minimum number of CB audits may be granted on a case-by-case basis. Contact standard_support@globalgap.org.

u) For the rotation of CB auditors, exceptions may be granted on a case-by-case basis. Contact standard_support@globalgap.org. Resource constraints are not a valid reason for being granted an exception to this rule.

v) GLOBALG.A.P. Full Remote may be used for unannounced CB audits for compliance with the 10% unannounced CB farm audits and 10% unannounced CB QMS audits.

w) The CB shall follow the rules for planning remote audits as defined in “GLOBALG.A.P. general regulations – Rules for certification bodies,” section 7.6.

4 RULES FOR CONDUCTING GLOBALG.A.P. FULL REMOTE (BASED ON IAF MD4:2018)

a) The CB auditor shall be aware of the risks and opportunities of the ICT and the impacts that these risks and opportunities may have on the credibility and objectivity of the information gathered. It is the responsibility of the CB to train the CB auditor accordingly, including on the contents of the GLOBALG.A.P. Full Remote procedure and GLOBALG.A.P. training material, where available. No additional sign-off on the part of GLOBALG.A.P. is necessary.

b) The means (tools) of verifications that may be used for the virtual meeting part of GLOBALG.A.P. Full Remote are:

(i) Interview with the producer: Worker interviews, including GRASP, may be conducted by phone or video call.

(ii) Video call in which the producer shows records
(iii) Video call in which the producer streams video of the site/facility to the CB auditor (Note: All the observed evidence shall be recorded in the checklist. Video streaming of the site/facility may be done by the producer or by an assigned person the CB chooses, who need not necessarily be a CB auditor.)

(iv) Sending pictures/videos instantly during the interviews (Sent files shall include information on the time and geo-reference for the location, or this information shall be available by other means.)

c) The CB audit report shall contain details of the different means (tools) used during the remote audit in order to demonstrate the proper implementation of this procedure.

d) The CB shall inform the producer when, how, why, and of what to make recordings, pictures, or video footage. The CB shall also indicate which of these will be saved as evidence, why, and for how long they will be stored. The producer shall agree and, if applicable, give consent and send/submit/transmit the evidence to the CB within the agreed timeframe.

e) The following guidelines apply and are mandatory when auditing different requirements. For the IFA standard the use of the guideline for audit methodology is mandatory. For GRASP, the use of the GRASP remote assessment guideline is mandatory.

(i) The following five audit methods shall be used:
   - V – visual assessment
   - I – interview with personnel
   - D – records or document review
   - X – cross-checking data and information, verifying data, linking records with each other and confirming their accuracy
   - C – challenging the content and plausibility of the information (e.g., when checking the risk assessments)

(ii) P&Cs and add-on-specific criteria requiring visual assessment (V): The remote audit shall include live video streaming (e.g., telephone camera, tablet camera)

(iii) If online video streaming is not possible, pictures (with indicated date and time) or videos (traceable to the time and date of the video shooting) may be acceptable. Those offline visuals shall be taken at the date of the remote audit and at the request of the CB auditor. The final CB audit report shall contain detailed justification of/comments on what was shown and how it was shown. The CB auditor is obliged to challenge critical areas in order to obtain as much visual information as possible to determine compliance with the checked P&Cs.

(iv) P&Cs and add-on-specific criteria requiring interview (I): Before the interview can begin, the CB auditor and the producer shall confirm their identity. The best way to perform the interview is via an audio and video communication channel, which will establish the identity of the producer and the person interviewed and their knowledge (e.g., familiarity with procedures and rules rather than reading off a text to answer the questions). If possible, telephone calls without video shall be avoided. During interviews, the producer shall ensure a quiet environment. If workers on the farm are interviewed and those workers do not speak the CB auditor’s language (e.g., seasonal foreign workers during GRASP assessments), translations shall be ensured by a representative of the producer.
(v) P&Cs and add-on-specific criteria requiring records or document check (D): Documents and records may be checked during the document review and/or the virtual meeting parts. The check can include emailing photos or scans, sending copies by email, and/or faxing. As currently stated in the general regulations, the off-site stage may consist of a desk review of “for example, the self-assessment, risk assessments, procedures required in various P&Cs, animal health plan, analysis programs (frequency, parameters, locations), analysis reports, licenses, list of medicines used, list of plant protection products used, proof of laboratory accreditation, certificates or assessments reports of subcontracted activities, and plant protection product/fertilizer/medicine application records, etc.” It may also include: harvesting and mass balance records, training records, calibration records, documentary proof of personal protective equipment, allowance for medical checks (not the results), stock list for both plant protection products and fertilizers, cleaning records for toilets, plant protection product list, GRASP declaration, complaint procedures, working contracts, etc.

(vi) During the virtual meeting, samples of other records/documents shall be made available in real time; the records shall be sent immediately. The CB shall take all possible measures to mitigate the risk of receiving fraudulent records during the CB audit.

(vii) P&Cs and add-on-specific criteria requiring cross-checking data and information, verifying data, linking records with each other and confirming their accuracy (X): The remote audit shall provide the means for cross-checking data and information in real time or with minimal delay. A blended approach with audio/video or only audio is possible provided that the requested documents are sent without delay to minimize the risk that documents (or records) are corrected based on the CB auditor questions. Screen sharing may be a good option. The goal is to ensure that the information is consistent.

(viii) P&Cs and add-on-specific criteria requiring challenging the content of the information (C): The content of the information (instructions, procedures, risk assessments) may be checked during the document review or during the virtual meeting. The goal is to ensure that the information is plausible.

5 GLOBALG.A.P. FULL REMOTE PROCEDURE FOR HIGH-RISK PRODUCERS

a) GLOBALG.A.P. Full Remote certifications of producers classified as high-risk shall require special attention, vigilance, and integrity from all involved CBs.

b) During the registration process, the CB shall pay specific attention to addressing the provisions of section 3 d) of this document.

c) Follow-up on-site CB audit

(i) The CB shall perform a follow-up on-site audit of 100% of high-risk producers during the validity of the certificate.

(ii) These CB audits may be announced or unannounced.

(iii) For all follow-up on-site CB audits, the full checklist shall be completed. The CB may (re)use certain checklist data from the previous remote audit with the objective of focusing on those points requiring visual assessment and/or interview. This may reduce audit duration on-site.

(iv) Unannounced follow-up on-site audits may be counted toward the 10% unannounced CB audits.
(v) It is likely that the harvest and/or the handling period will already be over during the CB audit, but some relevant agronomic activities shall be taking place on the farm during the follow-up on-site CB audit.

(vi) If no travel restrictions apply and the follow-up on-site CB audit has not been performed within the deadlines defined in section 5 c) (i), the certificate shall be suspended.

(vii) After a successful follow-up on-site CB audit, the remote attribute on the certificate shall be removed.

(viii) Certificates issued to producers classified as high-risk may be extended as per the currently valid certificate extension rules to allow the CB to conduct the follow-up on-site audit.

6 GLOBALG.A.P. FULL REMOTE PROCEDURE FOR MEDIUM-RISK PRODUCERS

a) If the certificate has already been extended, the GLOBALG.A.P. Secretariat will process only those transfer requests coming from the outgoing CB that extended the certificate validity. The transfer shall be finalized only when the accepting CB has completed the remote audit and the outgoing CB explicitly asks for the termination of the extension and authorizes the GLOBALG.A.P. Secretariat to transfer the producer to the accepting CB.

b) The CB shall perform follow-up on-site audits of 5% of the total number of medium-risk producers during the validity of the certificate. The 5% are calculated per certificate holder, not per standard or add-on. The 5% shall be rounded up to the nearest whole number. The CB shall conduct at least one follow-up on-site audit of a producer classified as medium-risk. After a successful on-site CB audit, the remote attribute on the certificate shall be removed.

c) Follow-up on-site CB audits may be announced or unannounced.

d) For all follow-up on-site CB audits, the full checklist shall be completed. The CB may (re)use certain checklist data from the previous remote audit with the objective of focusing on those points requiring visual assessment and/or interview. This may reduce audit duration on-site.

e) Unannounced follow-up on-site CB audits may be counted toward the 10% unannounced CB audits. Producers who have not received follow-up on-site CB audits have the right to ask for an on-site CB audit provided the conditions allow. After a successful on-site CB audit, the remote attribute on the certificate shall be removed. The producer acknowledges that this may result in additional certification costs.

7 GLOBALG.A.P. FULL REMOTE PROCEDURE FOR LOW-RISK PRODUCERS

a) The producer has the right to ask for an on-site CB audit provided the conditions allow. After a successful on-site CB audit, the remote attribute on the certificate shall be removed. The producer acknowledges that this may result in additional certification costs.

b) The CB is not required to perform follow-up on-site audits during the validity of the certificate for producers with low-risk classification.
8 GLOBALG.A.P. FULL REMOTE PROCEDURE FOR CERTIFICATE SCOPE EXTENSION

a) GLOBALG.A.P. Full Remote provides possibilities for certificate scope extensions (adding one or more new products) to the existing certificates even if the product grouping is not the same for the new product(s) as for the existing product. If the producer holds a valid certificate, is in an eligible risk classification, and requests scope extension for adding one or more new products, GLOBALG.A.P. Full Remote may be used, following the rules described for low-risk classification. Additionally:

(i) Before scope extension, a full checklist and report for this new product(s) shall be completed and uploaded.

(ii) The new product(s) shall be added to the existing GLOBALG.A.P. certificate, indicating the remote attribute. The “valid to” date of the original certificate remains unchanged.

b) In the case of adding a new production site to the scope of certification of an Option 1 multisite producer without QMS, the new site shall be audited remotely before being added to the certificate.

c) If, on a certificate with QMS (Option 2 or Option 1), more than 10% of members/sites and/or area are added or changed (see “GLOBALG.A.P. general regulations – Rules for producer groups and multisite producers with QMS”), the square root of the number of new members/sites shall be audited remotely before adding the new members/sites to the certificate.

d) If the producer refuses the remote audit, the certificate's scope cannot be extended.

e) Changes in the scope of activity for Chain of Custody companies may result in a change of the producer’s overall risk classification (e.g., a low-risk trading company that starts labeling products shall become high-risk).

9 ADDITIONAL CLARIFICATION FOR THE IMPLEMENTATION OF GLOBALG.A.P. FULL REMOTE IN OPTION 2 PRODUCER GROUPS AND OPTION 1 MULTISITE PRODUCERS WITH QMS

a) The CB QMS audit may be performed using GLOBALG.A.P. Full Remote. This may also include those procedures centrally managed by the QMS, but applicable at producer group member level.

b) The rules described in GLOBALG.A.P. Full Remote for high-, medium-, and low-risk producers apply.

c) The sample size for the producer group members shall not be reduced. It remains the square root (or 50% of the square root, whichever applies) of the number of registered/certified producer group members.

d) At producer group member level, the on-site CB audit may be replaced by GLOBALG.A.P. Full Remote.

e) The CB surveillance audit (of 50% of the square root of the number of members/sites) may also be performed remotely. The need for a follow-up on-site CB surveillance audit depends on the certificate holder risk level.

f) For high-risk and medium-risk certificate holder(s), if the annual CB QMS audit (including PHU and the producer group member CB farm audits) was performed remotely, the follow-up on-site CB QMS and farm audits may be combined with the on-site CB surveillance audit.
g) In the case of medium- and low-risk certificate holders, if no follow-up on-site audits were performed during the validity of the certificate, the recertification audit shall include the full square root of the current number of members/sites.

h) Internal audits shall not be performed using GLOBALG.A.P. Full Remote.

10 CIPRO AND GLOBALG.A.P. FULL REMOTE

a) Correct implementation of the GLOBALG.A.P. Full Remote procedure shall be checked in the framework of CIPRO. CIPRO assessors will closely monitor the incoming reports of remote audits.

11 ANNEX I FEASIBILITY AND RISK ANALYSIS FOR REMOTE AUDITS

This annex provides a generic identification of potential risks and opportunities by type of communication technology and it can be used as starting point to the determination of risks and opportunities for the decision-making process. In any case the determination should be made or revised for each situation. It is also important to remember that the intent is not to design a complex, formal, and quantified approach to risk and opportunity determination. The intent is to have the ability to identify the opportunities and the risks and to determine if the risks can be mitigated or accepted in order to take a substantiated decision whether to proceed with the application of remote methods or not.

When analyzing feasibility, the digital quality of the data to be reviewed should also be considered. This is more relevant when the organization still retains information on paper that needs to be scanned for remote review.

<table>
<thead>
<tr>
<th>1 Confidentiality, security, and data protection</th>
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<tbody>
<tr>
<td>Ensure agreement between CB auditor and producer about confidentiality, security, and data protection issues.</td>
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<tr>
<td>Document any arrangements to ensure them.</td>
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<table>
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<tr>
<th>2 Use of ICT</th>
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<tbody>
<tr>
<td>There is a stable connection with good online connection quality.</td>
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<tr>
<td>The ICT allows access to relevant documented information including software, databases, records, etc.</td>
</tr>
<tr>
<td>It is possible to make the authentication/identification of interviewed people preferably with image.</td>
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<tr>
<td>If observation of facilities, processes, activities, etc. is relevant to achieve audit objectives, it is possible to access them by video.</td>
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<tr>
<th>3 People in the organization</th>
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<tr>
<td>It is possible to access and interview people relevant for the QMS.</td>
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<tr>
<th></th>
<th>Complexity of the organization and audit type</th>
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<tr>
<td></td>
<td>In case of complex organizations, processes, or products and services and where the objectives of the audit type require full assessment of the standard and wider sampling (e.g., initial assessment or reassessment), a careful analysis of feasibility of remote audits to fully evaluate the organization conformance to all requirements should be performed.</td>
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<th>Conclusions</th>
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<tr>
<td></td>
<td>The audit objectives can be attained with the remote audit – proceed to remote audit.</td>
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<tr>
<td></td>
<td>The audit objectives can be achieved partially – a remote audit may be done partially and later complemented with an on-site CB audit.</td>
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<tr>
<td></td>
<td>The audit objectives cannot be attained via remote audit.</td>
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7 Validate risk analysis with audit program manager


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