



SERI COP Advisory 19

Advisory No. 19: Alternative Auditing and Certification Procedures in response to the Coronavirus (COVID-19) Outbreak

Reference Document: R2 Code of Practices

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Purpose of Advisory

The Coronavirus (COVID-19) outbreak has affected nearly the entire world at unprecedented levels and caused massive disruptions. These are extraordinary times requiring extraordinary measures. In an effort to maintain the oversight of certified R2 facilities and continued R2 Certification without massive disruption, SERI is implementing these procedures for the foreseeable future but not to extend past 31st December 2020. It is anticipated that after this initial disruption, there will be backlogs and compounding affects in scheduling and auditor availability, thus necessitating an approach spanning the entire year. We anticipate that these alternative procedures will provide both R2 Facilities and the Certification Bodies (CBs) with the tools to ensure the safety of all relevant personnel and continued R2 Certification through this unprecedented time.

The CBs and R2 facilities should keep normal certification schedules as soon as it has been determined safe to do so and public health is protected.

References

- ANAB Heads Up Issue #445 (2020/02/07)
- ANAB Heads Up Issue #448 (2020/02/28)
- ANAB Communique on Response to the Coronavirus Outbreak in China (2020/02/06)



- ANAB Accreditation Rule 9 (2014/01/01)
- IAF ID 3:2011 Issue 1 (8 November 2011)
- IAF MD 4:2018 Issue 2 (04 July 2018)
- SERI R2 Code of Practices Advisory 18 (May 13, 2019)
- SERI R2 Code of Practices Advisory 16 (January 22, 2019)
- SERI R2 Code of Practices Advisory 21 (September 11, 2020)
- ANAB Heads up - Remote auditing procedure

Disclaimer

These are SERI's rules for the R2 Certification program and SERI has no influence or control over any other certifications utilized by an R2 Facility. R2 Certification does require certification to other standards, like ISO 14001 and ISO 45001, or RIOS. The Certification requirements of these other standards are to be utilized and this document is to in no way be construed as revising the other certification program requirements. CBs will have the ultimate discretion to determine whether a remote audit is feasible and allowed for non-R2 audits.

Alternative R2 Auditing and Certification Policies

CBs must continue to be able to satisfy the requirements for evidence to determine conformance of the R2 facility when performed remotely. R2 Certification conformity requires evidence demonstrating implementation, not just evidence of policies and plans. CBs must suspend R2 Certificates if evidence cannot be verified onsite or remotely to support the R2 Certificate. CBs will continue to be held responsible for collecting, verifying, and reporting evidence that supports an active R2 Certificate.

The International Accreditation Forum (IAF) has previously published an informative document related to extraordinary events and has published mandatory documents for the use of information and communication technology (ICT) that can be used to facilitate a remote audit. The ANSI National Accreditation Board (ANAB) that accredits R2 CBs has also published documents related to extraordinary events, including recent communications specific to the Coronavirus (COVID-19) outbreak.

SERI will rely on ANAB and the accredited R2 CBs to follow these mandatory requirements and voluntary guidelines, however, SERI has further defined within this advisory the implementation of alternative auditing and certification methods and policies to issue and maintain R2 Certificates. SERI is in full support of CBs utilizing remote auditing techniques for R2 Certification activities to maintain auditing schedules when audit objectives can be achieved, is feasible and allowed as defined within this advisory. Remote auditing is not allowed in all scenarios and any



decision whether to use remote auditing will be the CB's sole discretion based on risk and the CB's ability to audit the R2 facility remotely.

The following rules will apply specifically to R2 Certification Audits

Surveillance Audits

For R2 Facilities that have stopped or reduced operations in response to the Coronavirus outbreak (whether forced by government or voluntary), surveillance audits may be postponed as long as they are completed within 2020. For first time R2 Certified facilities (those with Stage 2 audits completed in 2019), first year Surveillance Audits must be completed within 18 months of the Stage 2 audit and before December 31, 2020.

For those facilities that are operating during their scheduled onsite surveillance audit, and for some returning to operation after audit postponement, SERI will support the CB utilizing remote auditing techniques for surveillance audits in 2020 to maintain currently active R2 Certificates as long as audit objectives can be achieved. Eligibility for remote audits will be the sole determination of the CB based on the R2 Facility's past performance, complexity of scope, changes in scope, risk, etc. See "Remote Auditing Procedures" below for additional criteria to successfully use this alternative auditing method.

Facility moves shall continue to follow the rules identified in SERI R2 COP Advisory 18.

Recertification Audits

For R2 Facilities that have stopped or reduced operations in response to the Coronavirus outbreak (whether forced by government or voluntary) at the time of the scheduled recertification audit, expiring R2 Certificates may be extended for up to 6 months, but not beyond December 31, 2020 following ANAB's requirements in Heads Up Issue #448. A revised certificate must be provided to SERI before the current expiration date to avoid any disruptions in status. Recertification audits may be performed remotely provided the R2 Facility meets the requirements outlined in Advisory 21 (Recertification /Reassessment Remote Auditing during COVID-19 Pandemic) and at the CB's sole discretion based on risk and the CB's ability to audit the R2 facility remotely.

Stage 1 Audits

Stage 1 audits may be performed remotely when the R2 Facility provides documented information prior to the audit for the CB to make the determination that a remote audit may be effective for this R2 Facility and the risks of the facility's activities. Collected documentation must be kept as part of CB's Stage 1 audit report. CBs will have the sole discretion to make this decision



to proceed or not with remote audit. CBs may also add time to the onsite Stage 2 audit where information from the Stage 1 audit requires more time and auditing onsite. The

Stage 2 Audits

If an Onsite Stage 1 Audit is successfully completed at time of this advisory, the CB has two options for Stage 2 audits

- Part of the Stage 2 audit may be completed remotely if feasible. The remaining portion of the Stage 2 audit shall be completed onsite before the certificate is issued. The audit time allotted for the onsite Stage 2 audit must not be less than 50% of the total audit time allotted for Stage 2.
- The entire Stage 2 may be completed remotely if there are restrictions imposed by the region where recycler is located that prohibit an auditor to travel to or access the site. The CB shall maintain a record to document restrictions that necessitate a remote Stage 2. If the recycler failed the onsite Stage 1 audit or has numerous concerns that require the CB to go onsite to verify concerns, the CB shall not conduct the Stage 2 audit remotely.

If a remote Stage 1 Audit is performed, the Stage 2 audit must be performed onsite.

Suspended Certificates

Suspended R2 Certificates may be remotely audited and reactivated only if the nature of the nonconformities that resulted in suspension can be remotely verified for effective corrective action and continuing conformity. Extensions may be allowed beyond the typical suspension time, where justified, if auditing cannot be completed due to direct causes by the Coronavirus Outbreak. If suspensions exceeding the normal duration cannot be resolved and audited before December 31, 2020, then the R2 Certificate shall be withdrawn.

Remote Auditing Procedures

Each CB using remote auditing techniques will include procedures to meet this Advisory 19/21/ANAB Heads Up in their plans provided to ANAB under the ANAB Heads Up Issue #448. Required audit times shall not be reduced because of a remote audit. The remote audit typically would require more time to achieve the audit objectives including the additional time to obtain evidence remotely from the R2 Facility. Consistent with the procedures put forth in SERI COP Advisory 18 and IAF MD 4:2018, remote audits will include virtual tours using technology such as Facetime, Skype, or Google glasses.

Remote audits will also include video interviews of CB selected personnel and the electronic



transmission of evidence to the auditor for analysis. Video review of records will not be acceptable in a remote audit. Records must be provided in an electronic copy to be attached to the audit report. In many cases, the auditor will require more records to be able to select a credible sampling. File sharing services such as OneDrive, DropBox or similar are recommended for the R2 Facility to share the volume of information needed to support the audit activities.

If records are not digitized (such as BOLs) so they can be shared electronically, remote audits may not be an option. All documented information shall be maintained as part of the audit report. SERI expects CBs and R2 facilities to provide timely correction and completion of any unsuccessful remote audit so that the R2 facility is not provided extensions of an active Certificate without the confidence that the R2 facility is operating in conformance with the R2 Standard.

Nonconformities

All requirements for handling audit nonconformities continue to apply. *Delay of corrective action timeframes is not permitted unless it is the result of a direct impact from the Coronavirus crisis, such as the closure of the facility during the corrective action timeframe. All efforts should be made to maintain required corrective action procedures.*

R2 Certified Facility Responsibilities

The R2 Facilities which are R2 Certified, suspended, or in the process of becoming R2 Certified must continue to operate in conformance with the R2 Standard for the at all times, including through postponements of audits and extensions of R2 Certificates. *Failure to maintain conformance will result in nonconformities leading to potential suspension or withdrawal of the R2 Certificate.*

R2 Facilities are required to cooperate fully with the CB audit team during the scheduled remote audit to support an efficient and effective audit by providing evidence, supporting interviews, and live streaming of activities. Evidence must be promptly provided at the time of request without delay and not after the designated audit time. Any missing evidence or refusal to show the auditor areas of a facility or interviews with employees will be considered nonconformities and grounds for termination of the audit. SERI expects CBs and R2 facilities to provide timely correction and completion of any unsuccessful remote audit so that the R2 facility is not provided extensions of an active Certificate without the confidence that the R2 facility is operating in conformance with the R2 Standard.

Quality Control

CBs are required to continue internal quality control processes required under SERI R2 COP



Advisory 16 which now requires technical review of all audits. SERI will continue to review audits and the samples selected will include audits performed remotely as part of the quality control in SERI’s Audit Package Review program.

Reporting

The CB shall send SERI a copy of the update report that they send ANAB on a monthly basis that reflects list of alternative actions for each R2 audit that is postponed and/or remote audit techniques used and certifications that have been extended, suspended or withdrawn based on the provisions of this advisory.

Accreditation Body Audits of Certification Bodies

ANAB has established Accreditation Rule 19 which defines the criteria and processes for utilization of remote assessment techniques. SERI continues to support ANAB in this approach with assurance that the assessment objectives can be achieved.

Revision History

Revision No.	Change	Date of Release/Revision
1.1	1. Added SERI Code of Practices Advisory 21 to the References section. 2. Removing sentences “Recertification audits must be performed onsite. No remote audits will be allowed.” Replaced with “Recertification audits may be performed remotely provided the recycler meet the requirements outlined in Advisory 21 and at the CB’s sole discretion based on risk and the CB’s ability to audit the R2 facility remotely.”	September 15 2020
1.2	Adding a requirement that a Stage 2 audit can be conducted remotely provided the Stage 1 audit is completed onsite.	November 17 2020