Date: 7/28/2020

To: e-Stewards accredited Certifying Bodies (CBs)/Registrars

From: BAN/e-Stewards

Re: Guidance for e-Stewards Audits During the COVID-19 Pandemic

Given the rapid development of the COVID-19 virus pandemic and to protect the health and safety of our auditors as well as our certified recyclers and refurbishers, flexible solutions for audits have now been authorized by the e-Stewards Administrator. This is in addition to or clarification of the IAF and ANAB publications at IAF and ANAB regarding COVID-19 crisis.

We have established revised policies or clarifications with the aim of ensuring that recyclers can remain or become certified to the e-Stewards Certification program with a minimum of unnecessary hardship.

When an Organization is still operating and key staff necessary for audits are available:

BAN/e-Stewards urges you, wherever possible, to consider conducting all or part of the audits remotely rather than in-person in accordance with IAF MD 4, IAF MD3, ANAB Accreditation Rule 9 and with the rules as laid out below. Each case will need to be evaluated individually.

The decision to conduct audits remotely depends on each specific Organization’s circumstances and whether the processes that can be effectively audited remotely, and whether necessary technology (e.g. cameras in a facility, video conferencing, etc.) and personnel are available both at the CB level and in the Organization to support remote auditing.

After your evaluation, if it is concluded that conducting the audit entirely remotely leads to a satisfactory audit only in certain areas, partial remote audits are permitted and, in this case, complimentary in-person audits shall be conducted no longer than six months after the date of the partial remote audit. In the meantime, for recertification audits, the existing certificate may be extended up to 6 months and the new certificate may be issued only after the in-person audit has been conducted. Such an extension should only be granted if the delay is entirely due to effects of the COVID-19 pandemic. Furthermore, remote audits should be scheduled as soon as possible to prevent undue delay. Such remote audits may also be conducted with new Organizations which are going through an e-Stewards Certification for the first time.

If no partial or full onsite audit is possible or advisable due to the COVID-19 pandemic, Stage 2 audits can be conducted entirely by remote techniques as long as the objectives of a Stage 2 audit can be achieved through a remote audit. Whether or not this audit can be conducted remotely must be determined on a case-to-case basis by the CB after considering and documenting the specific risks of conducting a virtual audit rather than an in-person one. Once these risks are considered, assessed and documented, and the CB deems that the audit can be satisfactorily conducted remotely, they may proceed.

Please note that a remote audit is not to be conducted in the same way as a document review. Your audit should use video evidence if possible and in real time with audit team engagement with the
organization. You may request access to the surveillance cameras in a facility, or use of video applications with mobile devices and shall directly interact with members of the Organization throughout the audit just as you would during an in-person audit.

BAN/e-Stewards will keep monitoring and assessing the situation and will inform the CBs as of the date after which a return to normal practices shall begin.

When an Organization or facility is not operating anymore due to the pandemic or key staff necessary for audits are sick or otherwise unavailable for audits due to the pandemic:

In these more extreme cases, if it is recertification, the validity of the certificate may be extended up to 6 months in accordance with the ANAB Communication 448 of February 28, 2020. e-Stewards Administrator shall be informed of this situation and updated on a monthly basis until things return to normalcy.