

Policy

MFCC P 5 EE

2020-07-10

v01.00

Extraordinary Events affecting MFCC Notified Certification Bodies and Certified Organisations

MYANMAR FOREST CERTIFICATION COMMITTEE



Copyright notice

© MFCC 2020

This document is copyright-protected by MFCC. The document is freely and publicly available from the MFCC website or upon request.

No part of the document covered by the copyright may be changed or amended; reproduced or copied in any form or by any means for commercial purposes without the permission of MFCC.

Myanmar Forest Certification Committee (MFCC)
Forest Compound, Bayinnaung Road, West Gyogone,
Insein Township (11011), Yangon
Myanmar

Tel: +965 (0) 13644430

Fax: +965 (0) 13644431

Email: info@myanmarforestcertification.org

Website: www.mfcc.org.mm

Document name:	Extraordinary Events affecting MFCC Notified Certification Bodies and Certified Organisations Extraordinary Events
Reference number:	MFCC P 5 v1.00 EE/2020
Approved by:	MFCC
Issue date:	2020-08-28
Version date:	2020-07-10
Effective date:	2020-08-28

Contents

Contents.....	3
1 Policy Background.....	4
1.1 Introduction	4
1.2 Scope.....	4
1.3 Normative References	4
1.4 Definitions	4
2 Policy Standards.....	6
2.1 Extraordinary Event or Circumstance Affecting Certified Organisation.....	6
2.2 Extraordinary Event or Circumstance Affecting Certification Body	7
2.3 Alternative Auditing Processes	7
2.4 Extensions and Transition Periods.....	8
2.5 Records.....	8
3 Document History	9

1 Policy Background

1.1 Introduction

In the context of normal business operations, every organisation will be exposed to everyday opportunities, challenges, and risks. However, extraordinary events or circumstances beyond the control of the organisation can happen. In such a circumstance, MFCC notified Certification Bodies must have a process for the proper maintenance of certification.

This policy is based on PEFC International guidances and ISO standard. It specifies the minimum standards and guidelines Certification Bodies will need to comply with when making provisions during an extraordinary event

1.2 Scope

This policy is applicable to MFCC employees, notified certification bodies and certified organisations.

1.3 Normative References

Chain of custody auditing of PEFC certified companies affected by restrictions due to COVID-19 – guidance
Sustainable Forest Management auditing of PEFC certified entities affected by restrictions due to COVID-19 – guidance
Sustainable Forest Management auditing of PEFC certified entities affected by restrictions due to COVID-19 – guidance
ISO 19011:2018 Guidelines for auditing management systems
IAF ID 3:2011: IAF Informative Document For Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organisations
IAF MD 4 “IAF Mandatory Document for the use of Computer Assisted Auditing Techniques (“CAAT”) for Accredited Certification of Management Systems

1.4 Definitions

<i>Certified Organisation</i>	An organisation which has successfully completed auditing assessments and is certified by a Certification Body
<i>Certification Body</i>	Third-party conformity assessment body operating certification schemes
<i>Extraordinary Event</i>	An event or circumstance beyond the control of the organisation, commonly referred to as “Force Majeure” or “act of God”. Examples are war, strike, riot, political instability, geopolitical tension, terrorism, crime, pandemic, flooding, earthquake, malicious computer hacking, other natural or man-made disasters
<i>IAF</i>	International Accreditation Forum. The IAF is the world association of Conformity Assessment Accreditation Bodies related to conformity assessment in the fields of management systems, products, services, personnel and other similar programmes of conformity assessment.
<i>MFCC</i>	Myanmar Forest Certification Committee
<i>MFCS</i>	Myanmar Forest Certification Scheme. MFCS is contained in a range of documents including MFCC policies, Standard Operating Procedures, other supporting system documentation, and the MFCS Forest Certification Standard.

<i>MTLAS</i>	MTLAS is contained in a range of documents including MFCC policies, Standard Operating Procedures, other supporting system documentation, and the MTLAS Timber Legality Standard.
<i>MFCC Employee</i>	In this policy an MFCC employee can refer to full and part time employees, consultants and sub-contractors and volunteers.
<i>NCO</i>	Non-conformance and observations. A non-conformance is said to occur when a policy or practice is observed that goes contrary to the requirements of, in this case, MFCC (MTLAS and MFCS) documented policy and procedural requirements.

2 Policy Standards

2.1 *Extraordinary Event or Circumstance Affecting Certified Organisation*

2.1.1 A Certification Body shall establish a documented policy and process to assess the risk of continuing certification and to specify the steps it will take in the events where;

- a certified organisation is affected by an extraordinary event;
- a Certification Body is unable to conduct the normal certification auditing requirements;

2.1.2 The established policies and procedures of the Certification Body will define methods for evaluating the current and expected future situation of the certified organisation, and define alternate potential short-term methods of assessing the organisation to verify continuing effectiveness of its management systems.

At a minimum these requirements will also comply with this policy

2.1.3 The Certification Body will gather necessary information/evidence from the certified organisation before deciding on an appropriate course of action. The information must include the following at a minimum;

- When the certified organisation will be able to return to normal functioning;
- When the certified organisation will be able to ship products or perform the service defined within its relevant scope of certification;
- If the organisation will use alternative manufacturing and/or distribution sites. If so, are these currently covered under the current (MTLAS/MFCS) certification or will they need to be evaluated?
- Whether existing source material (in cases of sawmill production stockpile) complies with MTLAS requirements;
- During an extraordinary event, a Certification Body will agree the action plan with the certified organisation;
- Following the extraordinary event any action plan and/or response plan will be evaluated;
- Whether any of the processes and/or services performed will be subcontracted to other organisations, and if so how such activities will be controlled by the Certification Body;
- The extent of the impact on the operations of the certified organisation.

2.1.4 The Certification Body also needs to consider the risks related to cases where planning/conducting of the audit is not practicable because reaching the organisation's premises may be difficult or inadvisable for the auditor (e.g. restrictions because of national or local rules, health risks, flight cancellations, etc.).

2.1.5 If an assessment of the risk of continuing certification is low, and based on the collected information the Certification Body may need to consider alternative short-term methods of assessment to verify continuing system effectiveness for the organisation are acceptable.

This may include requesting relevant documentation for remote assessment (for example, management review meeting minutes, corrective action records, results of internal audits, test/inspection reports, etc.). At a minimum, the process will address the following consideration.

- Proactive communication between the affected certified organisation and the Certification Body;
- Steps the Certification Body will take to assess the affected client and how the plan to move forward will be communicated;
- Specifying a maximum time an alternative short-term assessment method could be used before suspension or withdrawal of certification.
- Criteria for renewing normal oversight, including the method and timing of any reinstatement activities and assessments;

- Re-establishment of surveillance/recertification activities according to the Certification Body plans when access to the affected location is re-established.

2.2 *Extraordinary Event or Circumstance Affecting Certification Body*

When the Certification Body establishes procedure for the proper maintenance of certification in the extraordinary event, the certification body Certification Bodies must:

- develop mutual understanding and trust with certified clients and end-users,
- establish appropriate processes (in response to extraordinary events).

The Certification Body is affected by extraordinary events must include the following information when specifying in the procedures the required reporting and communication activities.

At a minimum, the Certification Body must evaluate and report upon;

- Scope and extent of the affected services and business areas and sites;
- Number of affected clients;
- Instructions of the relevant government organisations;
- When the Certification Body will be able to function normally within the current scope of its service agreement;
- If the Certification Body has plans to outsource activities or operate at alternatives sites and how, if applicable, such arrangements are covered under the current MFCC notification will be needed;
- Proactive communication between affected certified organisations and the CAB;
- If the MFCC notified certification body is trying to be accredited certification body, they should refer and apply the other accreditation bodies' guidance documents such as MAB, ISO standards and IAF for extraordinary events' document and policy establishment;
- Steps the Certification Body will take to assess those affected organisations and how the plan to move forward will be communicated;
- Possible amendments to each certified organisation's oversight plans on a case by-case basis and in accordance with CB procedures.

2.3 *Alternative Auditing Processes*

2.3.1 Initial and Recertification Audits

The Certification Body shall not replace initial and recertification audit by remote audits. However, a Certification Body can carry out stage 1 activities of initial audits remotely off-site if needed, via telephone interviews and/or other remote means.

In normal circumstances recertification audits must be completed and the recertification decision made prior to expiration to avoid loss of certification (ISO/IEC 17021:2011, 9.1.1.2).

In the case of an extraordinary event, if sufficient evidence has been collected to provide confidence that the certified management system is effective, extension of certification can be granted. Initially this can be for a period not exceeding 6 months beyond the original expiry date.

2.3.2 Surveillance Audit

The onsite surveillance audit may be replaced by other audit techniques, such as documentation and records review, and other alternatives as decided by the Certification Body. Providing that sufficient evidence can provide confidence that the certified management system is effective a postponement of surveillance audits for a period not exceeding 6 months can be granted at the discretion of the Certification Body.

The certification body can adjust the timing of a subsequent surveillance audit in specific circumstance. For example, if an organisation has to shut down completely for a limited period of time (less than 6 months), it would be reasonable for a certification body to postpone an audit that had been scheduled to occur during the shutdown until the organisation resumes operations. The organisation should inform the certification body when operations resume so that the certification body can conduct the audit promptly.

2.3.3 Verification of Corrective Actions

Corrective actions for open nonconformities can be verified by other audit techniques than onsite verification, if the certification body have assurance that these other techniques show sufficiently clear evidence to conduct certification. Provided it can ensure effectiveness of its procedures, the Certification Body may use alternate audit techniques to verify and close non-conformances.

When open nonconformities cannot be effectively evaluate by remote audit techniques, the certification body shall evaluate the risk to continued certification and create the action plan. This process can lead to escalating non-conformity to suspension of certification. When nonconformities cannot be closed, the certification body must apply the MFCC documents such as certification body requirement policies.

2.4 Extensions and Transition Periods

This policy has specified possible postponements for an initial period not exceeding 6 months. A Certification Body, at their own discretion, can extend their initial postponement period up to and beyond the initial 6 months to a maximum, in extreme circumstances, of 9 months in total. A range of reasons may demand such measures. These include, but are not limited to:

- Government (local and/or national) regulations;
- Transitional readjustment to normal operations following a significant period of inactivity or activity change.

Any extension beyond 9 months will need approval from MFCC.

2.5 Records

The Certification Body shall evaluate and document each client and occasion for which policies and procedures in the case of extraordinary event are applied. This shall include the evidence considered in determining the extent to which the client and traditional audit arrangements are affected by an extraordinary event.

In addition the Certification Body shall maintain a record (example, a register) of the occasions when an extraordinary event measures were implemented and applied. All deviations from the established certification programme must be justified, documented and made available to MFCC upon request.

In the interests of transparency the certification body will make its extraordinary event Policies and Procedures publicly available.

3 Document History

Date of Amendment:	Version	Approval date:	Requested by:	Nature of Change	Approved by: