Covid 19 restrictions in ISCC auditing from CBs sight



In trems of "new Covid 19" rules, we have a bunch of advises, suggestions and procedures given to us by ISCC, the BLE (German Supervising Authority) and EC. This information is somtimes not very clear, confusing and in rarae cases, the one authority is telling the opposite of the other. Worst words are: "can", "would" and "may"

by CB

	Trader	Collector w & r
Rules given	"First"audits allowed – on site only	"First"audits allowed – on site only
	"Onsite surveillance may follow (could be done remotley as well)	"Onsite surveillance may follow (could be done remotley as well)
Our attempt	Surveillance is done remotley Mass Balance and some documents are checked	Surveillance is done remotley Mass Balance and some documents are checked – on site if possible and if "suspiccious" documents were received
Our suggestion	Remote Audits are possible even in case of First certification – one remote verification after 3 months (oblgatory)	Remote Audits are possible even in case of First certification but there is an obligation of at least 2 onssite verifications within the certification period Scheduled

POM/FGP

"First"audits allowed – on site only

"Onsite surveillance may follow (could be done remotley as well) -

On-Site whenever is possible (against the EC suggestion)
Surveillance is done remotley
Mass Balance and some
documents are checked – on site if possible and if "suspiccious"
documents were received.
Risk Assessment in Terms of LUC

Remote Audits are not allowed in case of First certification

Remote audits are possible in case of recertification