

# PrimusGFS General Regulations - Appendix 2

## Remote Certification Guidance during COVID-19 Pandemic

*Used in conjunction with the PrimusGFS General Regulations  
(Version 3.1 & 3.2)*

PrimusGFS (owned by Azzule Systems, LLC)

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**1. Introduction:**

- a. An alternative to an on-site inspection can be a remote audit for the organizations. This appendix has been developed to explain the processes for remote auditing for PrimusGFS Audits.
- b. This document and the PrimusGFS General Regulations must be used in conjunction with each other when conducting a remote audit.
- c. This remote option should be used only if the onsite audits cannot occur due to Covid-19 travel restrictions or other unusual events.
- d. The remote activities should be used in accordance to the International Accreditation Forum's MD-4:2018 "Mandatory Document for the Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes".
- e. It should be recognized and understood that this remote audit option is not benchmarked by GFSI.

**2. Process Guidance:**

- a. The organization must select the PrimusGFS remote audit option when completing the PrimusGFS application with their Certification Body (CB).
- b. The CB must review the organization's remote auditing request dependent upon the specific risks associated with that organization. Risks may include complaints or recalls related to the organization; history and maturity of the organization's PrimusGFS audits food safety management system; pending compliance or legal related issues; significant changes to their management or operation system, for example, a change of physical location, a change in the scope of activities, etc.
- c. The remote audit includes an off-site desk review of documents and the off-site virtual operation inspection.
- d. The CB and the organization shall use the compliance grid tool developed by Azzule Systems, i.e. the Certification Program Owner, or another secure data sharing method for document sharing and desk review activities involved in the remote inspection.
- e. The organization requesting the remote audit must allow the use of portable live video and audio streaming (e.g. live video capability, GoPro cameras, etc.) throughout the entirety of the audit (i.e., opening meeting, records review, walk-through, closing meeting, etc.). This is to ensure that the auditor can observe all relevant procedures, records, can see live all aspects of the hygiene of the operation, can conduct interviews, have communications with the relevant staff, and conduct any other activity required for the audit. The video and audio streaming should not be recorded, but screenshots are allowed, if necessary.
- f. The organization must adequately prepare in advance for the remote audit by ensuring that the camera being used can provide high quality video resolutions and audio can be easily heard by the auditor and organization representatives involved with the remote audit. They should consider having back up camera and audio accessories to anticipate any technical issues that could occur during the audit.
- g. The CBs shall ensure their auditors understand the appropriate processes and procedures to be used when conducting a remote audit.
- h. The CB shall ensure that an authorized remote audit maintains the same integrity and quality as an on-site audit and continuing throughout the evaluation, technical review, certification decision, etc.
- i. The CB, the auditor, and the organization must have an agreed-upon audit plan for how the remote audit will be conducted prior to the occurrence of the remote audit.
- j. All remote audits will be announced or pre-assessment audits.
- k. Corrective action submission and review will work the same as on-site PrimusGFS audits. Evidence for each non-conformance must be submitted to the CB by the organization within 30 calendar days from the original remote audit date. The CB will have 15 calendar days to review the corrective action evidence and notify the organization if it was accepted or rejected and close the non-conformance(s). If time allows (within the 30 calendar day corrective action timeframe), when corrective action evidence is rejected by the CB, the organization can re-submit additional

evidence to close the non-conformance.

- l. The certificate and report completed for a remote audit will be identified as a remote audit in the Azzule System, in the audit documents themselves. PrimusGFS remote audit certificates are valid for a maximum period of 12 months from the certification start date.
- m. When, for whatever reason, a remote audit cannot meet the same requirements and achieve the same standards as an on-site audit, the auditing company should not issue the certificate.
- n. Certificate extensions cannot be issued on remote audits. Auditees will need to request a new audit in order to maintain certification beyond the 12 month period.