

Audit Policies During COVID-19

During these uncertain times, the Regenerative Organic Alliance must adapt its policy for initial on-site audits to ROC™ operations by ROA approved certifying bodies to address the regional challenges and travel restrictions resulting from the COVID-19 pandemic crisis. Our position is intended to keep everyone safe and healthy while also helping eligible producers earn Regenerative Organic Certified™. The ROA is observing the best practices of the certifiers recognized under ROC. We will adapt to the best of the remote audit policies put forth by the following organizations/certifiers: Accredited Certifiers Association, the International Organic Inspectors Association, Fair for Life, Fair Trade International, Global Animal Partnership & Animal Welfare Approved.

On-Site Audits

All operations must 1) hold valid certifications recognized under ROC and 2) have had an on-site audit within the last renewal cycle or a planned on-site audit within the next 6 months. The CB will perform a risk assessment to determine if an on-site ROC audit can be performed in a safe and responsible manner. On-site audits will be performed in regions where there are local ROC trained inspectors who are able to access operations with minimal travel. All inspector travel must abide by local, regional, and national restrictions surrounding the global containment effort. Any on-site audit must follow the current best practices for ensuring health and safety.

Remote Audits

Should an on-site audit not be feasible due to high-risk factors, the ROA, working with the certifier, will support the use of alternative methods to perform remote and/or records audits as necessary and when applicable. If a remote and/or records audit is performed by a CB without a site visit, **an on-site audit will be required at a future time when it is safe to do so.** In all instances, the inspector, certifier, and the operation must agree on the audit plan.

Social Fairness Audits

Ensuring fair and transparent social audits without the ability to do on-site audits poses a particular challenge. In order to ensure the accuracy and transparency of social fairness audits, the ROA will defer any application that does not have an existing social fairness certification, **unless the operation is able to undergo an onsite social audit.** Auditing the additional ROC social fairness criteria by remote audit will only occur by applying a stringent risk-based approach and will be assessed on a case-by-case basis by the CB.

The ROA will continue to assess and respond to the situation as it evolves. Our policy for on-site audits will be updated based off regional restrictions and auditor availability, with the utmost concern for the health and safety of all parties in mind.

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ROC Remote Audit Policy	Effective 9/23/2021	Approved by EW