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1. Purpose

This instruction to be followed for the emergency situation related to natural or human made disasters. ETKO will develop case related measures to inform its personnel and the clients.

2. Scope

This instruction covers the measures to be taken against the **CORONA – COVID – 19** Pandemic.

3. Responsibilities

This procedure is prepared and implemented by the Management and QMR which the other department responsible will be involved according to the decision of the management.

All ETKO staff members to read and understand the procedure to implement appropriately

4. Application


First of all ETKO staff members to stay calm and analyze the risks of the virus among the members and the management. It is important to keep positivity, teamwork and commitment to supporting the clients. All precautions and steps to be taken by each staff member to protect personally and other colleagues in ETKO and the communities.

4.1 Office work:

ETKO offices will be open for its services, however the office staff will be encouraged to work from their home. ETKO Turkey office will be open daily as long as the state restrictions allows to continue. For this reason clients are free to apply for their certificates and inspections as usual practice. Office staff members should not come to the office unless otherwise required for any urgent issues. Following rules to be implemented for office work:

- Refrain to have many people to be in the office and personal contact to each other.
- Use protection as wearing masks and personal hygiene
- Keep 2 meters social distance among each other
- Keep a window open in the rooms to allow fresh air circulation where personnel is working
- Do not invite any client or any family members to the office, except health, post, laboratory, food delivery personnel.
- Personnel to have food and drinks in his/her own desk separately from other staff members.
- Hand washing during entry and exit from the office.
- In case any family member tested Covid-19 positive, do not come to office, stay home working.

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4.2 Audits:

There is growing impact of the COVID-19 epidemic, performing audits in affected areas has become a high-risk task.

All inspectors follow the guidelines and/or restrictions set by the **local jurisdiction** of **where the inspection is located**. The relevant regional health department, official resources to be consulted or the client to be asked for guidance. If there are uncomfortable situations with undertaking travel or the continuation of the scheduled work in any way, ETKO to be contacted. info@etko.com.tr +90-542 640 5944

4.2.1 Update on ETKO's steps regarding inspection assignments:

- Effective immediately postponing all mandatory (i.e., annual) and additional inspections in high- risk areas. However, we support your decision to conduct local/regional inspections whenever possible based upon information gathered from credible sources regarding potential risks.
- Refrain from traveling outside of your local region if you currently reside in a high-risk area.
- **ALL** unannounced inspections are postponed at this time until further notice. In addition, 5% of contracted operators with EU certification according to the risk category will be unannounced. EU 977-5.
- Your country and the countries listed by the Government as risk, all inspectors travelling stopped effective immediately and until further notice.
- The inspection team will continue to prioritize local and regional inspections and monitor the high-risk areas daily, postponing inspections accordingly.
- Inspectors work with clients to ensure that everyone is comfortable evaluating the risks and proceeding with the in-person inspection as a shared decision. If either party is uncomfortable continuing with the in-person inspection, then it should be postponed.
- ETKO provides the competence of the personnel involved in remote control and certification processes to carry out services using information technologies and records the trainings that will include protective measures related to the pandemic.

4.2.2 Measures to be taken when site audits realized:

- Is anyone participating in the inspection part of a **high-risk population**?
- Was anyone recently sick or connected to a possible COVID-19 case?
- Is anyone traveling to the inspection from a high-risk area?
- Does your region or location have new updates or changes?

4.2.3 Protecting health and the well-being during the audit.

If the decision is to proceed with the inspection: To protect health and social responsibility the guidelines explained below to be followed.

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- Check your temperature each morning to confirm you do not have a fever. Stay home if you have a fever or are showing any symptoms (cough, fatigue, sore throat, etc.). Contact us for assistance in cancelling the inspection.
- Avoid using public transportation where possible. Flights may be considered on an as needed basis.
- Discourage greetings with physical contact. No handshakes or elbow bumps, please use a friendly hello wave or an “air high-five” from afar.
- Incorporate social distancing whenever feasible. We recommend increasing the space and decreasing the frequency of contact among individuals. Ideally, conduct audits in areas that allow for keeping individuals six feet apart and keep people as far apart as is practical.
- Limit nonessential participants. We ask that only essential personnel be involved in audits.
- Wear a mask during the audit when requested by the client, and where available and appropriate.
- When handling documents, practice frequent hand hygiene. Follow **all of the guidelines** for 20+ seconds of handwashing with soap, use hand sanitizer, and do not touch your face.
- Sanitize equipment and work areas. Disinfect all equipment, tables, transportation, and work tools with **good practices** regularly.
- If someone is sick, the inspection should be postponed.

4.2.4 On-site, Remote / Virtual Audits

In case remote / virtual audits to be realized, the guides created by the owner of the official programs such as NOP-EU-TC Organic and TC GAP (ITU) programs and the private standards owners such as GLOBALG.A.P, GOTS, TE and Cosmos to be followed. And Remote/Virtual Audits will be conducted without violation or causing violation of privacy laws, local/national regulations or community practices or beliefs.

As a basic rule first time applicants for certification are not subject to the remote / virtual audits (except for GOTS, TE, EU and COSMOS). Only the operators who are having valid certification from the previous year audits may receive remote / virtual audits. For this type of audit the rules to be applied described by the standard owner organization.

During the effective period of pandemic remote / virtual audits may be realized but onsite audits to be realized within the time frame described when the measures are lifted. To realize this type of audit ETKO will follow the methods described or referred by the scheme owner organizations or the official institutions. On-site inspection; it must be done by the auditor performing the remote inspection of the operator concerned.

- Remote / Virtual audits can be done for the private standards such as GOTS, TE, Cosmos and GLOBALG.A.P. See related standards procedure for the Pandemic.
- Without any audits GOTS Scope Certificates could be extended up to 6 months, TE Scopes (OCS&GRS & RCS) Certificates up to 3 months.

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- Operators already having a valid NOP Certification could be audited remotely / virtually. NOP certification is not subject for extension for any time frame.
- IACB – EU Regulation scope allows certifiers to realize remote / virtual audits temporarily.
- The Guidance will be provided by the Ministry of Agriculture and Forestry will be followed for TC Organic and TC GAP (ITU) programs.
- GLOBALG.A.P allows extension of present certifications up to 6 months based on a risk assessment, which has to be recorded. See GLOBALG.A.P Procedure for more details.

COSMOS requirements are as follows:

a. Extension of certificate validity

COSMOS allows extension of validity by no more than 3 months.

b. Completion of a remote audit

Remote audits shall only be conducted when the Certification Body determines the audit to be low risk.

Remote audits shall be conducted for existing or new clients:

- with manufacturing sites that had a preceding onsite audit provided that ETKO determines the audit to be low risk. (Low risk means no major non-compliance affecting the integrity of the product or ingredients);
- who only perform brand owner or distributor activities at their sites;
- who only perform handling activities at their sites.

Remote audits should follow the same protocol as an onsite audit.

Remote audits under this current exemption can be performed up until 30th of September 2020.

EU requirements are as follows:

Official controls and other official activities may exceptionally be performed:

- in the case of analyses, testing or diagnoses to be performed by official laboratories, by any laboratory designated for this purpose by the competent authority on a temporary basis;
- in the case of physical meetings with operators and their staff in the context of official control methods and techniques referred to in Article 14 of Regulation (EU) 2017/625, via available means of distance communication.
- Investigations on suspected infringements and irregularities relating to the organic production rules will be continued to carry out timely with any available means during COVID-19 Pandemic. EU 977-(6)
- Due to the movement restrictions applied during the COVID - 19 outbreak period, research periods will be extended to determine the origin of irregularities or violations already found. EU 977-(7)
- During COVID-19 Pandemic It is not an obligation to send to operator a paper version of the certificate of inspection. EU 977-(9)

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- f. This instruction will be applied until the end of September 2020 for EU. However, the documentary checks in respect of low risk operators, will be allowed to replace the relevant physical inspections until the end of December 2020. Moreover, the number of the sampling, additional random visits and unannounced inspections will be calculated over the year 2020. EU 977-(10)
- g. The number of samples to be taken and analysed by ETKO every year will correspond to at least 2 % of the number of operators under its control. EU 977- Derogations from Regulation (EC) No 889/2008-3.
- h. The reply to a notification relating to non-compliant products, will be sent within 60 calendar days from the date of the original notification. EU 977- Derogations from Regulation (EC) No 889/2008-4.
- i. The additional random control visits carried out will cover 5 % of operators under contract in accordance with the risk category. EU 977- Derogations from Regulation (EC) No 889/2008-5.
- j. The certificate of inspection will be issued by ETKO by introducing all necessary information and validating box 18 in the Trade Control and Expert System (TRACES). It will be endorsed by the relevant Member State's competent authority by validating box 20 in TRACES and be completed by the first consignee in TRACES. EU 977- Derogations from Regulation (EC) No 1235/2008-1.
- k. At the verification of a consignment the relevant Member State's competent authority will endorse the certificate of inspection by validating box 20 in TRACES. EU 977- Derogations from Regulation (EC) No 1235/2008-2.

4.2.4.1 Remote / Virtual Audits

a) Preparation for Remote / Virtual Audit

- First of all, risk analyses should be made to determine, whether Remote/Virtual Audit will comply with the guides created by the owner of the official programs such as NOP-EU-TC Organic and TC GAP (ITU) programs and the private standards owners such as GLOBALG.A.P, GOTS, TE and Cosmos.
- Remote / Virtual Audit should be carried out by the inspector performing the previous audit of the operator in question. If the inspector, who previously performed the on-site audit, is not available, the inspection can be carried out by another inspector who is fully familiar with the case.
- A suitable interview program should be selected for use in Remote / Virtual Audit. (Skype, Zoom, Microsoft Teams and similar programs). The video recording option of the selected program should be active.
- Before the Remote / Virtual Audit of the operators who are certified within the scope of EU or TC GAP (ITU) or TC Organic programs; risk assessment should be done in terms of environment, human and animal health.
- The reasons for the remote control of the operators who are certified within the scope of ITU or TC Organic should be determined with the information and document and recorded in the relevant audit file.
- A pre-interview should be made with the client through the selected remote/virtual audit program, and the path to be followed should be explained to the client and a mutual trial of the remote/virtual audit program to be used should be conducted. The trial should be done both through the mobile device that will be the eye of the inspector and through the PC.
- ETKO should be prepared for the audit according to the criteria specified in the "4.3 Inspection Planning" section below and should be clearly stated to the client that the remote/virtual audit will be performed.

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- The process of assigning an auditor through Ecert and accepting the audit by the auditor should be completed.
- The remote/virtual audit plan must be forwarded to ETKO before it is sent to the client. Necessary information should be given to GOTS or TE by ETKO. (and, if available, other programs COSMOS and NOP).
- The subjects such as the departments to be audited, the ones to be present during the audit, the documents and records to be evaluated, the employee interviews should be clearly stated to the client.
- Approval must be obtained from the operator (operator who is certified within the scope of TC GAP (ITU) or TC Organic programs) that he has been informed about the remote control process, that control can be carried out remotely, and that control will be verified at the production site no later than three months after the outbreak ends.
- Analysis report, visual outputs of critical points and all kinds of information, documents etc. related to the operation should be requested from the operator, and these documents should be examined by taking into consideration the control reports and corrective activities of the establishment's previous production period.
- According to the Law No. 6698 on Protection of Personal Data, the explicit consent statement should be obtained from the operator regarding that the audit process recording (video and sound) can be realized.

b) Realizing Remote/Virtual Audit

- The Remote/Virtual Audit should start with the opening meeting, and the audit video recording should start with the opening meeting.
- It is recommended that audit video recordings are kept part by part, with separate video recordings for each audited part. (It is recommended that a video duration should not exceed 10-20 minutes, as there are risks of recording and disconnection in long video recordings.) Recorded videos are named according to the audited area.
- The camera connections of the personnel participating in the audit should be as active as possible during the audit.
- The audit process is carried out by the auditor by directing the eye of the inspector.
- During the audit, screenshots are also taken as objective evidence. (Since the camera is constantly active, it is recommended to take screenshots in a stationary process. It would be more effective for a second person to take a photo and share them with the inspector instantly during the inspection.)
- It is more appropriate to make registration inquiries during the audit, if possible. Recording inquiries that may arise due to resolution problems can be done through photographs.
- In the audit of electronic records, firstly, online audit should be done, data collection should be tried in the form of screenshots, instant reports should be requested during remote/virtual audit.
- A suitable room should be set up for employee interviews, and interview materials should be provided for this room. Before the audit, room tour should be done with the camera for room suitability.
- The client must have communicated to their employees that at least one week before the audit, employee interviews will be held during the audit. (evidence must be evaluated before the audit or when not possible, during the audit)
- Employees should be encouraged to convey their concerns about confidentiality during employee interviews to the auditor by email(info@etko.com.tr) or telephone.
- Video recordings, screenshots and photographs taken during the audit should be named according to the relevant sections or document name.

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- A video recording and photo documentation of the site facilities including important audit matters is kept as proof of the GOTS Virtual Audit and is presented to the respective Accreditation Body if and when demanded. These are including:
 - Storage of goods and chemical inputs (Separation / Identification)
 - Safety and Occupational Health
 - Effluent Treatment Plant

c) Hybrid Audit

When there is no access possible to any city/region/country due to restrictions for the travellers, ETKO can use the local auditors/auditor trainees, assisting / participating the auditor assigned for the inspection. In this case local ETKO staff member(s) will participate the audit and follow the instructions given by the assigned auditor.

d) After Audit

After the audit, Ecert entries should be completed and the file should be forwarded to the verifier. (For GOTS, if the employee was informed about the email and telephone interview and accepted, the audit should be completed after waiting at least 4 days.).

Certification decision can be taken for low risk operators of all scopes,

e) Additional measures:

When measures lifted for travelling ETKO will include site audits and/or sample taking as required by the Standard / Regulation owner authorities. For this reason ETKO will define the necessity of a site audit with the Risk Assessment done during the remote audit. When ETKO believes and / or the Standards / Regulations measures enforce, ETKO will realise announced or un-announced on-site audit and/or sample taking within a reasonable time period.

4.3 Inspection Planning

- ETKO Staff will communicate with the clients for information
- Unannounced or additional inspections will be postponed for another date
- Annual surveillance inspections will be realized according to this procedure
- First time applying operators applications will not be accepted except GOTS and COSMOS
- Operators having already a valid certificate according to any private standards, certification will be extended according to the standard requirements, as explained in this procedure. There will not be extension implemented for the certification issued under the official state programs such as TC Organic, TC GAP (ITU), IACB- EU and NOP.
- If an inspection is cancelled by the client, there are potential expenses that ETKO will charge outlined in the **TI 14 Fee Schedule**

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4.4 Certification

The following statement should be added to at the bottom of the first page of GOTS Scope Certificates issued after the Virtual Audit:

“A Virtual Audit was performed due to restrictions arising out of the COVID-19 outbreak prior to issue of this Scope Certificate”

4.5 Fees

If an inspection is cancelled by the client, there are potential expenses that ETKO will charge outlined in the TI 14 Fee Schedule. **TI14 Fee Schedule** Inspectors should be aware of the potential charges when inspections are cancelled within one week of the planned date by the client. ETKO will communicate clearly and completely with all clients who will be impacted to clarify in case any charges occurs.

If there is any concerns or questions about costs or anything else, Inspections Department to be consulted. ETKO staff members to take precautions, make case specific decisions that work to protect the health of themselves and clients.

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