1. Purpose

In this time of ongoing and changing global challenges, Fair Trade USA wants to ensure that our partners’ health and safety are treated as a top priority. This includes all workers, farmers and fishermen in our Certified supply chains, our Certificate Holders’ management and employees, our brands, traders and Conformity Assessment Bodies (CABs) and their staff and auditors globally, as well as all related communities. This document outlines our current and ongoing approach to auditing and certification during the global Coronavirus crisis. With this policy Fair Trade USA recognizes the elevated health risks as well as heightened risks related to compliance resulting from the pandemic, and aims to manage these risks for all stakeholders.

2. Scope

This policy is applicable to all applicants and entities certified globally to any standard in the Agriculture, Seafood, Apparel and Home Goods, and Trade programs. It also applies to pilot programs audited against the Agriculture Production Standard, i.e. aquaculture and dairy programs. While this policy applies to Fair Trade USA at large, it is implemented at the program level and exceptions may occur within an individual program.

3. Approach to Certification Accommodation

3.1. Fair Trade USA recognizes that an audit involves the visit of an external individual at a site and creates uncertainty due to risks of Coronavirus contagion.

3.2. When countries, sectors and/or specific sites are in operation, Fair Trade USA may allow onsite audits to be conducted as part of the assurance program. Fair Trade USA monitors the World Health Organization and countries’ government announcements related to travel regulations, business operations and workers’ rights, and has developed a decision tree (Annex 1) and risk-based approach to guide partners and offer a transparent framework for deciding when and where to proceed with onsite audits. Decisions to conduct onsite and remote audits may differ on a country-per-country, or even site-per-site basis, due to changing and local conditions.

3.3. To support all individuals involved in Fair Trade USA programs, the following accommodations to Certification operations are being implemented, effective October 1st, 2020:
3.4. Certified Producers

3.4.1. Return to onsite audits may begin in any country or location where Fair Trade USA has granted approval based on a risk assessment following the decision tree described in Annex 1.

3.4.2. Under the Agriculture and Seafood program CABs shall follow hybrid auditing procedures for surveillance and recertification audits until further notice\(^1\). CABs will inform Certificate Holders about the specific procedures, timelines, and audit plans in advance of commencing each part (remote and onsite) of the audit. CABs will conduct a risk assessment following the decision tree described in Annex 1 in order to determine the feasibility and safety of proceeding with the onsite phase of the audit without requiring prior approval from Fair Trade USA.

3.4.3. Certificates may be extended up to 6 months, if validity is expiring by December 1\(^{st}\), 2020.

3.5. Applicants Producers

3.5.1. Producers should continue to submit new applications to Fair Trade USA in preparation for initial Certification audits.

3.5.2. Scheduling of onsite audits may begin in any country or location where Fair Trade USA has granted approval based on a risk assessment following the decision tree described in Annex 1.

3.5.3. Under the Agriculture and Seafood program CABs will conduct a risk assessment following the decision tree described in Annex 1 in order to determine the feasibility and safety of proceeding with an onsite audit.

3.5.3.1. CABs shall notify Fair Trade USA within two weeks of receiving the application notification of the outcome of this assessment;

3.5.3.2. If possible to proceed, CABs shall follow hybrid auditing procedures for initial audits as referenced in 3.4.2 above.

3.5.4. Initial Certifications are not granted until an onsite audit (either a full onsite audit or hybrid audit including an onsite component) is completed. It should be noted that in countries/localities where a return to onsite audits is not yet possible, the application will be put on hold until further notice.

3.6. Licensed Traders

3.6.1. Fair Trade USA will offer remote audits for traders where possible.

3.6.2. In all other cases, until further notice onsite audits may be approved by Fair Trade USA.

3.6.3. Fair Trade USA will inform traders with upcoming audits whether their onsite audit will be scheduled or will be carried out remotely.

3.6.4. Ongoing desk auditing and transactions communications with partners will continue as per normal procedures.

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\(^1\) CABs shall follow [Guidance on APS and CFS Compliance Assessment During Emergency Situations](#). Hybrid auditing procedures include (a) remote desk review / remote audits in one or more phases and (b) completion of follow-up onsite audit to take place as soon as it is safe and possible to proceed.
3.7. Safety Precautions

3.7.1. CABs are required to implement heightened safety precautions when returning to onsite audits. In addition to any specific guidance provided by each program, at a minimum this shall include the following:

a) All legal permissions/permits required to travel and conduct onsite activities are obtained;
b) Any applicable quarantine requirements are fulfilled;
c) Time spent onsite is minimized to focus on the parts of the audit that require onsite verification;
d) Logistics onsite are arranged to minimize risks, including observing social distancing, use of personal protective equipment (PPE), and minimizing time spent indoors, as well as any protocols required by the specific facility or site.

3.7.2. CABs shall implement procedures and maintain records to ensure that safety precautions are followed by auditors during the audit.

4. Duration, Revisions and Limits of this Policy

4.1. Duration

4.1.1. This temporary policy is valid as of the date of publication and until revised or rendered null and void.

4.2. Revisions and Communication

4.2.1. The content of this policy will be revised and updated as needed, as Fair Trade USA monitors the situation globally.

4.2.2. All updates to this policy will be published on Fair Trade USA’s website, with a new version number and month of publication in the footer.

4.3. Limits

4.3.1. Fair Trade USA reserves the right to require onsite audits to proceed as per standard procedures, provided that safety precautions are taken to reduce risk, in the event that a major compliance risk is identified, specifically in the areas listed below:

a) Child labor
b) Forced, bonded, or compulsory labor
b) Discrimination, harassment, or abuse

4.3.2. Individual programs may have additional limits considered within the program.

5. Exceptions to this Policy

5.1. Requesting an Exception

5.1.1. Where the authorities allow onsite audits and the CAB, the auditor(s) and Fair Trade USA agree to proceed with conducting the audit according to this policy, Certificate Holders are expected to facilitate the process and audit activity as required in the program assurance manual.
5.1.2. Should a partner disagree to proceed with an onsite audit, an Exception Request Form must be submitted to Fair Trade USA for review and decision, according to the Exception Procedure available on the website.

5.1.3. Should the implementation of this policy lead to other consequences that would result in the need for an exception to a different aspect of the Fair Trade USA standard or assurance system, the partner may follow the Exceptions Policy to request an exception.
Annex 1: Decision Tree for Travel to Conduct Onsite Audits

Fair Trade USA and CABs conduct a risk assessment following the decision tree below in order to determine whether to proceed with an audit.

[Diagram of the decision tree is shown here, describing the process for assessing whether to proceed with an audit based on various factors such as status of industry, level of transmission risk, travel permits, etc.]

Minimum considerations:
1. Adequate health infrastructure & capacity
2. Health insurance coverage
3. Possible to conduct work outdoors

Minimum considerations:
1. Domestic travel infrastructure operational
2. Hospitality infrastructure operational
3. Any required travel permits in order