## PSU Derogation

<table>
<thead>
<tr>
<th>Code</th>
<th>FSC-DER-2020-004</th>
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<tbody>
<tr>
<td>Requirement(s)</td>
<td>As indicated below</td>
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<tr>
<td>Request by</td>
<td>FSC accredited CBs and (independent) training providers</td>
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<td>Rationale as provided by CBs / and (independent) training providers</td>
<td>Due to the pandemic of novel coronavirus (COVID-19), vast areas of the world are subject to travel restrictions. This results in difficulties for CBs and (independent) training providers to ensure conformity with FSC requirements with regards to auditor qualification and other requirements specifically related to auditors.</td>
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| Scenarios for applying this derogation | This derogation applies in situations where:  
- CBs assess there is a health risk involved in allowing auditors to travel to conform with FSC training and (continuous) qualification requirements;  
or  
- auditor candidates, qualified auditors, supervising auditors, training providers, trainers and trainees are prevented from conducting and participating in trainings and audits due to travel restrictions. |
| Qualification of auditor candidates | It is not possible to qualify FM auditor candidates by replacing on-site audits by desk audits.  
CoC auditor candidates that participated in at least two on-site audits may conduct CoC desk audits, if they otherwise successfully completed their training program in accordance with FSC requirements. Prior to conducting any on-site audits on their own, such auditors are required to complete the remaining on-site audits. |
| Continuous qualification | The number of days conducted as desk-based audits during 2020 may count as auditing days for retaining auditor status and shall be recorded accordingly. |
| Continuous qualification | All 3-yearly witness audits that are due in 2020 may be postponed for up to twelve (12) months. |
| Training courses | Training Providers may replace classroom (in-person) training by remote trainings until 31 December 2020, based on the following specifications:  
- travel restrictions are in place for any of the registered trainees or the trainer(s).  
- the training provider shall document all cases of travel restrictions;  
- trainings should offer similar opportunities as in-person trainings to conduct practical exercises and allow for interaction of trainer(s) and trainees (as far as technology allows),  
- decisions about replacing in-person trainings by remote trainings may be based on travel restrictions that are in place up to two months before the scheduled in-person course. |
This derogation may be retroactively applied to training courses that were cancelled due to coronavirus prior to the publication of the derogation.

Note: Clause 1.2 specifying that ‘two hours of in-person training are seen as equivalent to one hour of online training’ may also be applied to this derogation.

<table>
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<tr>
<th>Auditor rotation</th>
<th>For audits due in 2020 and where auditor rotation is required, the rotation period may be extended by one (1) audit.</th>
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</table>

### Scope of derogation

- ☒ Generic (applicable by all certification bodies and (independent) training providers)
- ☐ Specific (applicable only upon individual request and PSU confirmation)

### References

- IAF ID 3: 2011: Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations
- IAF MD 4: 2018: The Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes

### Approval date

23 April 2020

### Period of validity

Until 31 of December 2020, or until withdrawn. This derogation will be updated as necessary.