



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-Sixth Session

REVISED PROPOSED DRAFT PRINCIPLES AND GUIDELINES ON THE USE OF REMOTE AUDIT AND INSPECTION IN REGULATORY FRAMEWORKS

(Prepared by the Electronic Working Group Co-Chairs Australia, Singapore, Canada and China)

APPENDIX I

DRAFT PRINCIPLES AND GUIDELINES ON THE USE OF REMOTE AUDIT AND INSPECTION IN REGULATORY FRAMEWORKS

(At STEP 3)

The Co-Chairs have incorporated many of the comments received via the Circular Letter (CL 2023/12/OCS-FICS) to improve the draft principles and guidelines and would like to thank members for their constructive comments.

Following the approval of proactive work on these draft principles and guidelines by the 45th Session of the Codex Alimentarius Commission (CAC), the Co-Chairs amended the title of the draft text from 'remote audit and **verification**' to 'remote audit and **inspection**'.

One member has raised a concern regarding the change from 'verification' to 'inspection', however the Co-Chairs implemented this change to align the draft guidelines and principles with language used within other CCFICS text, as the purpose of this work is to supplement existing guidance. The *Principles for Food Import and Export Inspection and Certification* (CXG 20-1995), and *Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems*, including the Annex: Principles and Guidelines for the Conduct of Assessments of Foreign Official Inspection and Certification Systems (CXG 26-1997), only defines **audit** and **inspection**.

Additionally, the work proposal identified remote verification activities such as "audit and inspection" indicating the use of a generic, common meaning, for verification with the specific elements identified as audit and inspection.

The inclusion of verification would require for this to be defined in these draft guidelines and principles, as well as other CCFICS texts. Comments received via the Electronic Working Group (EWG) and through CL 2023/12/OCS-FICS have supported the change to inspection.

The Co-Chairs have agreed to retain inspection however would welcome views from the Committee.

Section 1: Preamble/Introduction

1. Remote audit and inspection activities, ~~including verification and assessment activities~~, while presenting some challenges, can offer significant benefits to competent authorities and food businesses whilst also providing an appropriate level of effective national competent authority oversight. ~~Such tools~~ **These activities** can also ensure continuity of audit and inspection regulatory activities when physical visits are not practical.

2. As technology continues to develop and offers increasing potential to undertake regulatory activities remotely, it is important for the use of such technology by competent authorities and auditing bodies to be transparent and agreed between the relevant parties negotiate the use of such tools within the food supply chain. This remains true whether this concerns inspections or audits of Food Business Operators (FBO) by the competent authority responsible for their oversight or audits of exporting country competent authority oversight of FBOs in food business operators performed in the context of systems audits by importing country competent authorities.

The Co-Chairs have added in an additional point at Paragraph 3 to highlight that the intent of the guidelines is to describe how remote audit or inspection activities could be used to improve the efficiency and effectiveness of official controls, when conditions support the use of available technologies. This was a common theme picked up through the comments received and the additional paragraph is intended to provide further clarity. This has resulted in revised paragraph numbers.

3. Remote audit or inspection may improve the effectiveness and efficiency of official controls under the right conditions. Remote audit or inspection activities should not increase the cost to deliver official controls as it should consider availability of existing technology.

4. These principles and guidelines guidance supplements current Codex texts when competent authorities and auditing bodies consider undertaking the whole or part of an audit or inspection, remotely. Relevant current texts include:

- a. *Principles and guidelines for national governments for National Food Control System (NFCS)* (CXG 82-2013);
- b. *Principles and guidelines for monitoring the performance of National Food Control Systems (NFCS)* (CXG 91-2017);
- c. *Principles and Guidelines for the Exchange of Information between Importing and Exporting Countries to support the trade in food* (CXG 89-2016); and
- d. *Guidelines for the design, operation, assessment and accreditation of food import and export inspection and certification systems* (CXG 26-1997), and especially the Annex on Principles and guidelines for the conduct of assessments of foreign official inspection and certification systems.

Section 2: Purpose / Scope

5. The purpose of these principles and guidelines guidance is to assist competent authorities in the use of remote audit and inspection activities within their regulatory frameworks.

6. The scope of these principles and guidelines guidance is the use of remote audit and inspection as an optional tool to support the effective delivery of official controls both within a country's NFCS and the assessment of an exporting country's NFCS, or a relevant part thereof.

Section 3: Definition

7. **Remote Audit or Inspection:** The auditor(s) or inspector(s) are not physically present at the site to be audited or inspected.

Section 4: Types-Examples of remote audit or inspection activities:

The Co-Chairs have amended Paragraph 8.a and Paragraph 8.c to incorporate member's comments and to streamline both paragraphs for readability.

8. Remote audit and inspection activities can be considered as either "partial", when only some parts are conducted remotely, or "full", when all parts are completed remotely. Examples of a Audit or inspection activities that may which can be conducted remotely, may include, but would are not be restricted to:

- a. **Live video-streaming:** When Where a Food Business Operator (FBO) and/or an exporting country competent authority representative where a will stream live video footage is streamed from a (FBO business facility and/or an official facility as directed and an audit site guided by an auditor of the competent authority representative to observe observing real-time operating conditions.

- b. **Pre-recorded video:** Where a pre-recorded video is taken at the request of an auditor or inspector and electronically submitted to them for assessment.
- c. **Off-site desktop review of documentation:** Where ~~When a FBO and/or exporting country's competent authority will submit~~ documentary evidence ~~or data is submitted~~ for review by a competent authority audit/inspection team to confirm required activities have been undertaken or ~~outcomes testing results~~ achieved. These data ~~may be supplemented by~~ ~~could include~~ photographic and/or video footage ~~and are typically sent by electronic means such as email.~~
- d. **Remote collection of measurement information:** Where a competent authority can access data relayed from measuring devices and equipment for example, temperature recordings, or other electronically captured data reported directly to that competent authority ~~(usually within a competent authority jurisdiction).~~
- e. **Virtual interview:** Where an importing country competent authority or auditing body will conduct remote interviews with a FBO and/or the exporting country competent authority to assess compliance, understand systems and processes, and/or evaluate regulatory verification requirements.

Section 5: Principles

9. Many of the basic principles and considerations are the same for both in person/on site and remote audits, however the nature of remote audits brings additional considerations. In deciding whether and when to use remote audit and inspection tools, competent authorities and auditing bodies should consider the following.

Principle 1: Remote audit and inspection activities complement and ~~do not in some cases can~~ replace physical/~~in-person~~ audits or inspections

10. Remote audit or inspection activities may be used as the sole regulatory tool for verifying compliance of a process, facility or NFCS or used in combination with physical/~~in-person practices~~ audits or inspections. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their ~~assessment~~ agreement of the suitability, compatibility, and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspected site ~~ion facility~~. Periodic physical audits or inspections could provide confidence in remote audit or inspection results over time.

Principle 2: Remote audit and inspection activities should be aligned with ~~to~~ physical audits and inspections ~~activity best practises~~

11. Relevant processes for conducting a physical audit or inspection will similarly apply to the remote process, such as sufficient notification of the need and planning for an activity, the scope, explaining the audit criteria, the scope, standards being applied, assessment preparations, entry and exit meetings, the provision of feedback and draft reports for comment, and other activities as per best practice and international guidance.

Principle 3: Risk-based approach should be used when deciding upon a risk-based audit or inspection

The Co-Chairs have amended the original text to make Principle 3 a stand-alone sentence rather than a heading which is more aligned with the intent of Principles in Codex documents.

12. Competent authorities should perform remote audit and inspection activities in a manner that is proportionate to risks posed. ~~Consideration should be given to~~ Noting:

- the frequency of such audits or inspections is ~~is~~ should not be greater than that justified by the risk posed and by the performance of the FBO or NFCS; ensuring that any increase in frequency because of the remote nature of the audit is justified; and
- that the scope of remote audits or inspection ~~remains the same as if the physical audit was being conducted.~~ should be clearly defined and agreed by both parties and will be determined by the risk assessment.

Principle 4: Remote audit and inspection activities ~~must~~ **should** be planned and conducted in a cooperative manner

13. Planning and implementation of remote audit and inspection activities should **be conducted in a cooperative manner**, considering the level of technology **accessible to the FBO and/or exporting country competent authority has access to**, to support the proposed activities. **Considerations should include** the technology available, the internet coverage, the bandwidth of the internet, wireless connectivity impeding structural elements of buildings, and the quality of the handling and presenting of information are just a few elements that can impact the success of the remote activity.

Principle 5: Protection of confidential information

14. **The mechanism used for** sharing during a remote audit or inspection is different to that during a physical audit or inspection and brings additional challenges. ~~Video streaming can be captured and shared, and documents presented or sent can be distributed or copied, all increasing the risk to the auditee's right to privacy and protection of intellectual property.~~ Competent authorities should **ensure be mindful of** the confidentiality of information/data in line with the relevant legal requirements in their countries. Parties ~~must agree to handle personal and commercially sensitive material in a manner that provides protections and assurances to the auditee regarding confidentiality, including security of ICT access and information collection, storage and handling processes.~~ **Should undertake all necessary precautions to prevent any unauthorised access to and use of personal data and confidential information.** When such conditions cannot be guaranteed, a physical audit or inspection may be appropriate.

Section 6: Roles and Responsibilities

The Co-Chairs have separated Paragraph 15 into two points in response to comments received to clearly distinguish between the chapeau, and the role of the competent authority from the entities being audited or inspected. The Co-Chairs have also separated Paragraph 17.a into separate points, to distinguish between the responsibility of ensuring suitable access to technology to support a remote audit or inspection, and communicating commitment to an audit.

15. The roles and responsibilities of the competent authorities and entities to be audited or inspected are similar in remote and physical audit and inspection activities. However, ~~stakeholders all~~ may face some additional responsibilities in facilitating these activities to be undertaken remotely.

16. ~~notably the e~~ **Competent authorities conducting remote audits or inspections should y must:**
- a. Review legislation to ensure it supports remote audit and inspection activities as appropriate;
 - b. Establish audit and inspection programs, policies and procedures which outline the conditions and scenarios for the use of remote versus physical audit and inspection activities as appropriate; and
 - c. Provide clear direction to the entities to be audited or inspected (e.g. food businesses, and other competent authorities) on the information and communication technology requirements necessary for successful execution of the remote audit/inspection **and determine whether such requirements are feasible.**
17. Entities to be audited or inspected ~~have the role and responsibility to~~ **should:**
- a. Ensure they understand the availability of and ~~have their~~ **access to necessary technologies to facilitate remote audit and inspection activities when there is a stipulated reasonable requirement from a competent authority; and**
 - b. ~~They should~~ **Clearly indicate their ability and commitment to engage in remote auditing or inspection, otherwise or whether a physical audit or inspection would be their preferred option.**

Section 7: Planning and Implementation

18. While remote audit and inspection activities will generally follow steps that are similar to ~~the physical versions of these~~ **audit or inspection** activities, there are important considerations that will contribute to their successful implementation.

Planning

The Co-Chairs have removed 'Frequency' based on the comments received and agreed this duplicated Principle 3 and was no longer required. The Co-Chairs have incorporated changes received and have broadened Paragraph 19.C to expand considerations of technology beyond connectivity issues.

19. The following points should be taken into consideration when planning remote audit and inspection activities:

~~**Frequency:** Competent authorities should not unnecessarily increase the frequency or duration of remote audit or inspection activities when compared to physical on-site audits or inspections.~~

a. **Timing:** Where significant time zone differences exist between the location of the auditor ~~or inspector~~ and auditee, the hours of operation of the food business ~~or competent authority~~ should be ~~prioritized~~ **given priority** when establishing a time for conducting a remote audit or inspection to ensure that remote audit and inspection activities are delivered during standard ~~operation~~ **operating** hours.

b. **Qualifications:** ~~Officials or officially recognized bodies~~ **Auditors or inspectors** conducting the remote audit or inspection should be as appropriately qualified and competent as if conducting a physical ~~onsite~~ **audit or inspection**. There may be an ~~additional need~~ **requirement** for proficiency in the application of any technologies used during the ~~remote~~ **audit or inspection** activity.

c. **Technology:** ~~Where the level of access to~~ Consideration should be given to the technology required for ~~a~~ remote audit or inspection is not adequate, e.g. ~~poor or limited videoconferencing connectivity~~, consideration should be given to **including:**

- i. ~~Whether the adequate access to the relevant technology needed for a remote assessment~~ **audit or inspection** is a reasonable requirement;
- ii. Whether the use of technology remains as the most appropriate approach or whether other types of remote ~~audit or inspection~~ (e.g. desktop review of documentation ~~or pre-recorded video~~) would be able to provide the required level of assurance;
- iii. Whether technical assistance or support is ~~appropriate for~~ **available to** the food business operators and/or competent authorities in relation to ~~the identified infrastructure, connectivity, and access to technology~~;
- iv. Testing of connections and ~~remote~~ IT systems between competent authority and FBO, and between competent authorities to ensure a successful audit; and
- v. Both sides agreeing on contingencies when planning remote audit and inspection activities to manage possible interruptions caused by technological failures ~~(e.g. loss of connectivity)~~.

Implementation

20. The following should be considered during conduct of remote audit and inspection activities:

a. **Protection of information:** Parties conducting remote audit and inspection activities should strive to gather information that can be shared freely without the need for secure channels of transmission. When it is necessary to gather information that is personal or commercially sensitive, ~~the parties who conduct remote audit and inspection activities should arrange for secure lines of transmission of that data. Personal or commercially sensitive information should~~ **be transferred over secure channels and should not be shared with any third party without the consent of the original owner and should be stored in a secured manner and destroyed in a secure manner when no longer required. National data protection legislation should be considered in these processes.**

b. **Feedback:** Depending on the actual conditions, both parties may decide whether to include in the closing/exit meeting a discussion and ~~confirmation~~ **review** of the remote audit or inspection process. The auditing or inspecting party should provide its feedback in written form afterwards.

c. **Health and Safety:** Best practice work ~~place~~ **health and safety** procedures applied for physical audit and inspection activities remain applicable, for example, for any person who may be instructed to take measurements or record activities ~~during an audit or inspection~~ Health and safety procedures should take into consideration the length of activity sessions, differences in time zones and need for breaks to maintain physical and mental wellbeing of all participants.

Co-Chairs response to comments on CL 2023/12/OCS-FICS

GENERAL COMMENTS	MEMBER / OBSERVER	EWG Response
<p>The United States supported expedited initiation of this work and appreciates the significant progress made by the EWG as reflected in the Draft Principles and Guidelines (Appendix I). There remain some important issues that could benefit from further discussion and review, however, to increase understanding and improve the clarity of the guidelines for potential users.</p> <p>Notably, the scope and applicability of the text needs clarification throughout. Paragraph 2 and the Purpose/Scope section in Paragraphs 4-5 appear to indicate that the intent is to provide guidance both to countries conducting remote audits and inspections internally (“within their regulatory frameworks”) as well as to importing countries conducting remote audits and inspections of exporting countries.</p> <p>If so, that should be clearly stated and the wording throughout should be reviewed to make sure that both circumstances are adequately taken into account and reflected in all sections. (For example, in Section 4 under Paragraph 7—7(a) is not clear on which “competent authority” is directing/guiding, 7(e) seems only applicable to importing country interviews of exporting countries’ FBOs or authorities, etc.) If the intent is limited to guidance for import/export situations, that should be made clearer.</p>	USA	<p>The Co-Chairs thank the USA.</p> <p>In most cases this would be the auditor but could also be the auditee who directs the camera to the point in question. Best to change “competent—authority representative” to “auditor”.</p> <p>For 7(e) text does not limit to exporting competent authority, includes FBO as part of the systems audit process if required.</p>
<p>Kenya appreciates the work done by the EWG chaired by Australia, and co- chaired by Singapore, Canada and China and supports advancement to Step 5 taking note of the comments raised. Kenya also proposes EWG to continue with this work to address the issues raised.</p>	Kenya	The Co-Chairs thank Kenya.
<p>India appreciate the work done by the eWG chaired by Australia and Co-chaired by Singapore, Canada and China. We would like to submit following general comments on the document under consideration:</p> <ul style="list-style-type: none"> Provisional agenda (CX/FICS 23/26/1) indicated title of the Agenda Item 7 as “Proposed draft Principles and Guidelines on the Use of Remote Audit and Verification in Regulatory Frameworks” whereas the actual document (CX/FICS/23/26/7) title is “Proposed draft Principles and Guidelines on the Use of Remote Audit and Inspection in Regulatory Frameworks”. The document title needs to be uniform to avoid any confusion among members. 	India	<p>The Co-Chairs thank India. Whilst the original work proposal identified “audit and verification” during the development of the document there was a strong desire from members to amend the title to focus the work in CCFICS defined terms. Inspection is part of CCFICS title</p>

<ul style="list-style-type: none"> • In case of Remote Audit and Inspection, the role of Information and Communication Technologies (ICT) is quite crucial. Therefore, the members need to be careful while using remote audit and inspection to ensure that cost of technology is not burdensome to Food Business Operators (FBOs), particularly in reference to small FBOs, justify the risk involved and user-friendly. • Verification activities are not specifically defined in the CCFICS text. Therefore, if we are considering to include verification also in the scope of the document, it would be more appropriate that agreed definition should be included. • The remote audit and inspection activities may be carried out in case of pandemic and other emergency situations since physical verification gives much clearer and factual picture as compared to remote audit. 		<p>so should be part of the assessment.</p> <p>Principles 1 and 4 addressed this issue and encourage the applicability of audits or inspections be discussed as they are with physical audits and any requirements regarding ICT and its cost be included in that discussion.</p> <p>Verification was not specifically included in the scope of the document. The Codex definition for verification is from CCFH and does not adequately cover CCFICS activities.</p>
<p>New Zealand supports the development of this guideline acknowledging that undertaking regulatory activities remotely has been increasing, driven by a range of factors, and can be a practical way for regulatory functions to protect the health of consumers and ensure fair trade practices to be undertaken when circumstances dictate. Having supported the accelerated process for the commencement of new work as set out in the Project Document endorsed by CAC45 New Zealand is concerned at the change from 'audit and verification' to 'audit and inspection' and does not support either the change in the title or the global replacement throughout the entire text from 'verification' to 'inspection'. New Zealand therefore has proposed amendments throughout the text with rationale to address this.</p>	<p>New Zealand</p>	<p>The Co-Chairs thank New Zealand for their comments. <i>CAC/GL20-1995 Principles for food import and export inspection and certification</i>; and <i>CAC/GL26-1997 Guidelines for the design, operation, assessment, and accreditation of food import and export inspection and certification systems</i> define inspection and audit.</p> <p>We note the term verification was used generically in the proposal document and identified as including remote audit and remote inspection (paragraph 2), and reaffirmed in paragraphs 8 and 10.</p> <p>Verification is not clearly defined in CCFICS texts.</p>

<p>The European Union and its Member States (EUMS) would like to thank Australia, Singapore, Canada and China for leading the work on remote audits and inspections.</p> <p>The EUMS support the proposed draft Principles and Guidelines on the Use of Remote Audit and Inspection in Regulatory Frameworks as presented in Appendix 1 of CX/FICS 23/26/7 with the following comments.</p>	<p>European Union</p>	<p>The Co-Chairs thank the EUMS.</p>
<p>Indonesia would like to express her appreciation to Australia as chair and Singapore, Canada and China as Co-Chairs of EWG for their efforts to prepare draft principles and guidelines on the use of remote audit and inspection in regulatory frameworks.</p> <p>Please find below Indonesia specific comments on the draft guidelines.</p>	<p>Indonesia</p>	<p>The Co-Chairs thank Indonesia.</p>
<p>agree with no comments.</p>	<p>Iraq</p>	<p>The Co-Chairs thank Iraq.</p>

<p>SPECIFIC COMMENTS</p>	<p>MEMBER / OBSERVER</p>	<p>EWG Response</p>
<p>DRAFT PRINCIPLES AND GUIDELINES ON THE USE OF REMOTE AUDIT AND INSPECTION-<u>VERIFICATION</u> IN REGULATORY FRAMEWORKS</p> <p>New Zealand does not support the title change and suggests it revert to the use of 'verification' for the following reasons:</p> <ul style="list-style-type: none"> • Including the word 'inspection' shifts the scope considerably into the territory of end point product testing which was not as outlined in the Purpose and scope of the Project Document accepted by CAC45. • Although 'inspection' may be used by some to apply to a whole business or system it still implies the old fashion continuous and detailed observation of products and process which is at odds with modern thinking and practices. • The term 'Verification' is the modern and accepted term and is used extensively throughout Codex and CCFICS text. 	<p>New Zealand</p>	<p>The Co-Chairs note New Zealand's concerns. Please refer to earlier comment above.</p>
<p>DRAFT PRINCIPLES AND GUIDELINES ON THE USE OF REMOTE AUDIT AND INSPECTION IN REGULATORY FRAMEWORKS</p> <p>Mauritius thanks the Chair and Co-chairs of the EWG for the efforts towards progression of work on the Proposed Draft Principles and Guidelines on the Use of Remote Audit and Verification in Regulatory Frameworks. The EWG can pursue this work to address issues raised and to promote wider participation of Members. Mauritius also supports the</p>	<p>Mauritius</p>	<p>The Co-Chairs thank Mauritius.</p>

<p>advancement of the draft principles and guidelines to Step 5 in Codex step process, taking note of its comments in the document.</p>		
<p>DRAFT PRINCIPLES AND GUIDELINES ON THE USE OF REMOTE AUDIT AND INSPECTION IN REGULATORY FRAMEWORKS</p> <p>We suggest that the committee reflects on the use of "regulatory frameworks" in this context.</p>	<p>Norway</p>	<p>The Co-Chairs thank Norway for their comment. The text has been written primarily for audit and inspection bodies working under a competent authority regulatory program. So change this change was not made to the text.</p>
<p>Section 1 Preamble/Introduction</p>		
<p>Para 1. Not all activities performed as verification activities may fall within the scope of "audit and inspection activities." If the text is meant to include verification and assessment activities, the title should reflect this and the verification and assessment activities should be separated from inspection activities.</p>	<p>USA</p>	<p>The Co-Chairs believe that to properly consider this comment the definitions of verification and assessment as intended by the author would be required and the context in which they are to be used should be articulated. In the absence of this information, we refer to the work proposal document and the reference to audit and inspection as verifications.</p> <p>This issue may have arisen through some ambiguity in the original document. We took the view that the verification activities were the audit and inspection activities and could be amended to:</p> <p>Para 1. Remote audit and inspection activities, including verification and assessment activities, while presenting some challenges, can offer significant benefits to competent authorities and food businesses whilst also providing an appropriate level of effective national competent authority oversight. Such tools can also ensure continuity of audit and inspection regulatory activities when physical visits are not practical.</p>

<p>Para 1. Remote audit and inspection-verification activities, including verification and initial assessment activities, while presenting some challenges, can offer significant benefits to competent authorities and food businesses whilst also providing an appropriate level of effective national competent authority oversight. Such tools can also ensure continuity of audit and inspection-verification regulatory activities when physical visits are not practical.</p> <p>Replace 'inspection' with 'verification'. The key concept in paragraph 1 is oversight which is consistent with both audit and verification. Inspection can imply an individual item sorting/inspection type of activity such as occurs with meat inspection and is a significantly different concept.</p>	<p>New Zealand</p>	<p>The Co-Chairs note New Zealand's concern about the use of the term inspection, however the Co-Chairs believe that whilst the term inspection can mean product inspection it is not restricted to that meaning and we are using the broader definition for inspection as identified in CCFICS texts CAC/GL 20-1995, and CAC/GL 26-1997.</p>
<p>Para 1. Remote audit and inspection activities, including verification and assessment activities, while presenting some challenges, can offer significant benefits to competent authorities and food businesses whilst also providing an appropriate level of effective national competent authority oversight. Such tools can <u>complement to physical audit and inspection activities</u> and also ensure continuity of audit and inspection regulatory activities when physical visits-activities are not practical.</p> <p>Indonesia proposed to re-phrase this para and add the underlined sentences. This para is a preamble, therefore we need to emphasize that remote audit and verification can be useful for competent authorities as a complement to physical/onsite audit/inspection activities that have been practicing.</p>	<p>Indonesia</p>	<p>The Co-Chairs note that the document does not prescribe the use of remote audit or inspection and does in a number of places note that remote audit or inspection is an additional tool.</p>
<p>Para 1. Remote audit and inspection activities, including verification and assessment activities, while presenting some challenges, activities can offer significant benefits to competent authorities and food businesses whilst also providing an appropriate level of effective national competent authority oversight- businesses. Such tools can also ensure continuity of audit and inspection regulatory activities when physical visits are not practical.</p> <p>FAO would like to propose a simplification in the text to ensure clarity.</p>	<p>FAO, USA</p>	<p>The Co-Chairs note the FAO and the US's comments and has revised the text to improve clarity along the lines suggested. Revised text with deletion of verification and assessment would read:</p> <p>Remote audit and inspection activities, including verification and assessment activities, while presenting some challenges, can offer significant benefits to competent authorities and food businesses whilst also providing an appropriate level of effective national competent authority oversight. Such tools These activities can also ensure continuity of audit and inspection regulatory activities when physical visits are not practical.</p>

<p>Para 2. The last sentence appears to limit the intended scope of the document in the context of audits and inspections performed by the competent authorities of importing countries to “systems audits” of exporting countries’ competent authorities’ oversight programs. If the intent is broader, this should be clarified, for example, by replacing “or audits of competent authority oversight on [of] food business operators performed in the context of systems audits by importing country competent authorities” with “audits and inspections</p>	<p>USA</p>	<p>The Co-Chairs agree that the word “systems” should be deleted. Similarly, the suggestion to simplify the text for readability has been noted and revised text proposed.</p>
<p>Para 2. Comment: The words "and auditing bodies" should be deleted.</p> <p>Rationale: The document is talking about remote audit and inspection in the context of regulatory framework therefore the word “competent authorities” will cover all authorities which are competent to take such audit or inspection. It could be national competent authorities in the context of NFCS or the competent authority of the importing country in the context of audit or inspection of the export country as clearly specified in second part of the paragraph 2 and paragraph 4 under Purpose/Scope. The Private Auditing Bodies or Inspection Bodies may not fall in the scope of this document.</p>	<p>India</p>	<p>The Co-Chairs note India’s comment regarding the use of the term auditing bodies. The Co-Chair’s noted this was a term provided by another member as alternative to the use of competent authorities, as the competent authority might be the country but the auditing body another member. In this case if a competent authority uses an auditing body in its regulatory framework then such models should not be precluded from this text.</p>
<p>Para 2. As technology continues to develop and offers increasing potential to undertake regulatory activities remotely, it is important for <u>the use of such technology by</u> competent authorities and auditing bodies to be transparent and negotiate agreed with the use of such tools within the food supply chain <u>relevant parties</u>. This remains true whether this concerns inspections or audits <u>verification</u> of food business operators by the competent authority responsible for their oversight or audits of competent authority oversight on food business operators performed in the context of systems audits by importing country competent authorities.</p> <p>For clarity and completeness - agreement between the parties on the use of technology is a key aspect - not just the process of negotiation - and also to align with paragraph 1 and using verification not inspection.</p>	<p>New Zealand</p>	<p>The Co-Chairs note New Zealand’s comment and has amended the text to capture the intent. New Zealand concern regarding the use of the word inspection is noted.</p>
<p>Para 2. As technology continues to develop and offers increasing potential to undertake regulatory activities remotely, it is important for competent authorities and auditing bodies to be transparent and negotiate the use of such tools within the food supply chain. This remains true whether this concerns inspections or audits of food business operators by the competent authority responsible for their oversight or audits of competent authority oversight on food business operators performed in the context of systems audits by importing country competent authorities.</p>	<p>Norway</p>	<p>The Co-Chairs suggest the second paragraph provided gives clarity to the document that we will lose if deleted. The paragraph has been amended and hopefully allays any concern.</p>

We suggest deleting or redrafting the second paragraph as it is difficult to understand.		
<p>Para 2. As technology continues to develop and offers increasing potential to undertake regulatory assessment activities remotely, it is important for competent authorities and auditing bodies to be transparent and negotiate the use of such tools within the food supply chain. This remains true whether this concerns inspections or audits of food business operators by the competent authority responsible for their oversight or audits of competent authority oversight on food business operators performed in the context of systems audits by importing country competent authorities.</p> <p>In our view the term "regulatory activities" are linked to setting regulations and legal framework, and not the activity of performing inspection and audits remotely, we therefore suggest this amendment.</p>		Noted.
<p>Para 2. As technology continues to develop and offers increasing potential to undertake regulatory activities remotely, it is important for competent authorities and auditing bodies to be transparent and negotiate the use of such tools within with the food supply chain. This remains true whether producers and reflect this concerns inspections or audits of food business operators by the competent authority responsible for their oversight or audits of competent authority oversight on food business operators performed in the context of systems audits by importing country competent authorities. audit protocol.</p> <p>FAO believes that a simplified text will ensure clarity with members</p>	FAO	The Co-Chairs believe that the additional text, as modified, is required to provide necessary clarity to members. Concerns regarding producers by the FAO are noted.
<p>NEW - Remote audit or inspection may improve the effectiveness and efficiency of official controls under the right conditions. Remote audit or inspection activities should not increase the cost to deliver official controls as it should consider availability of existing technology.</p>	Canada	The Co-Chairs have included the text to provide clarity to members.
<p>Para 3. Brazil wonders if the "Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations" (CXG 19-1995) and the "Guidelines for the Exchange of Information between Countries on Rejections of Imported Foods" (CXG 25-1997) would be useful as a reference.</p>	Brazil	The Co-Chairs thank Brazil for their comments. The Co-Chairs did not include the references identified as their was no reference to inspection or audit in those documents.
<p>Para 3. Comment: The words "and auditing bodies" should be deleted.</p> <p>Rationale: The document is talking about remote audit and inspection in the context of regulatory framework therefore the word "competent authorities" will cover all authorities which are competent to take such audit or inspection. It could be national competent authorities in the context of NFCS or the competent authority of the importing country in the context of audit or inspection of the export country as clearly specified in second part of the</p>	India	The Co-Chairs note the concerns raised.

paragraph 2 and paragraph 4 under Purpose/Scope. The Private Auditing Bodies or Inspection Bodies may not fall in the scope of this document.		
Section 2 Purpose / Scope		
The purpose should be included in a separate section that is different from the scope. We think this document should follow the same structure as the other Committee documents.	Colombia	Noted.
Para 4. The purpose of this guidance is to assist competent authorities in the use of remote audit and inspection-verification activities within their regulatory frameworks. To align with our general comment that inspection should be replaced with verification, which is a well understood modern term widely used in Codex and CCFICS text.	New Zealand	Noted.
Para 5. Is the intent to limit use of remote audit and inspection to NFCS/systems equivalence?	USA	No.
Para 5. The scope of the guidance is the use of remote audit and inspection as an optional tool to support the effective delivery of official controls both within a country's NFCS and as well as the assessment of an exporting country's NFCS, or a relevant part thereof.	Norway	Noted.
Para 5. The scope of the guidance is the use of remote audit and inspection as an optional <u>a complement</u> tool to support the effective delivery of official controls both within a country's NFCS and the assessment of an exporting country's NFCS, or a relevant part thereof. Indonesia proposes to replace "an optional" to be "a complement". In conducting an audit, a physical audit is certainly more able to have thorough assessment. Remote audits can only be considered as optional if there are certain conditions such as a pandemic. Therefore, in this guidance remote audit is more appropriate as a complement rather than an option. Because there are several assessments that cannot be done remotely at all, such as organoleptic assessments.	Indonesia	The Co-Chairs note the comments but believes the identification of remote auditing and inspection as a complementary or additional tool has been expressed in the document.
Para 5. The scope of the guidance is the use of remote audit and inspection as an optional tool to support the effective delivery of official controls both within a country's NFCS and the assessment of an exporting country's NFCS, or a relevant part thereof. <u>controls.</u> FAO would like to propose a simplified sentence: The scope of the guidance is the use of remote audit and inspection as an optional tool to support the effective delivery of official controls.	FAO	Co-Chairs felt the retention of the text clarified the areas of application of the guidelines which was a common question from members.
Section 3: Definition		

New Zealand suggests that consideration is given to developing definitions for 'Verification' and for 'Assessment' in the context of CCFICS, to be potentially included in this guideline as well as possibly to be proposed for inclusion in one of CCFICS foundation document.	New Zealand	Noted.
<p>RemoteRemote audit or inspection activities: The auditor or inspector is not physically present at the site but use communication technology to be audited/inspectedsupport the <u>assessment</u>.</p> <p>We propose to have definition about "remote audit or inspection activities" than just "remote".We need to have same definition regarding the remote audit itself.</p> <p>Remote: The auditor <u>auditor(s) or inspector is/inspector(s) are</u> not physically present at the site to be audited/inspected.</p> <p>FAO proposes this change to allow for the possibility of a team of auditors/inspectors to operate.</p> <p>Columbia: Change the term defined to "Remote audit or inspection". The heading "Remote" is not clear for the definition included.</p>	Indonesia FAO Colombia	The Co-Chairs agree there is better clarity if the term is more defined.
Section 4: Types of remote audit or inspection:		
This section provides a very good oversight.	Norway	The Co-Chairs thank Norway for this comment.
<p>Section 4: Types of remote audit or inspection: The meaning of type in the title and the list in the text do not match.</p> <p>Burundi proposes an amendment to the title and of section 4 by restructuring it to read as 'Methods of remote audits'</p> <p>Justification: The listed are examples of methods and not types of audit.</p>	Burundi	Amended as per Burundi's comment.
<p>Comment: Kenya proposes an amendment to the title and of section 4 by restructuring it to read as 'Methods of remote audits'</p> <p>Justification: The listed are examples of methods and not types of audit.</p>	Kenya	The Co-Chairs agree that the title is confusing and whilst methods might be an improvement, there may still be some lack of clarity. The title is changed to
Uruguay suggests changing the heading of Section 4, "Types of remote audit or inspection" to "Activities that can be part of a remote audit or inspection".	Uruguay	Examples of remote audit or inspection activities:
We would like to know the source or origin of the 5 types of audits or inspections included. This is necessary for clarity and to continue developing the document.	Colombia	The Co-Chairs thank Colombia for its question. The types are examples of activities that have been identified by members during the consultation in

		development of the document. There is no restriction to using these activities.
<p>Para 7. Remote audit and inspection activities can be considered as either "partial", when only some parts are conducted remotely, or "full", when all parts are completed remotely. Audit "Examples of audit or inspection activities which can that may be conducted remotely, may remotely include, but would are not be restricted to, the following:"</p> <p>Suggest including language that the remote audit can include any or all of these and change language to clarify that this is simply a list of examples of remote audit activities:</p>	USA	<p>The Co-Chairs thank Kenya, Colombia, Uruguay, USA, Mauritius, for their comments. Para 7 has been amended as follows:</p> <p>Para 7. Remote audit and inspection activities can be considered as either "partial", when only some parts are conducted remotely, or "full", when all parts are completed remotely. Audit "Examples of audit or inspection activities which can that may be conducted remotely, may remotely include, but would are not be restricted to, the following:"</p>
<p>Para 7. Remote audit and inspection activities can be considered as either "partial", when only some parts are conducted remotely, or "full", when all parts are completed remotely. Audit Types of audit or inspection activities which can be conducted remotely, may include, but would not be restricted to:</p>	Mauritius	
<p>Honduras suggests including text to mention that a remote audit or inspection activity could be performed through one or more of the elements on the list.</p>	Honduras	
<p>Para 7. Remote audit and inspection-verification activities can be considered as either "partial", when only some parts are conducted remotely, or "full", when all parts are completed remotely. Audit or inspection-verification activities which can be conducted remotely, may include, but would not be restricted to:</p>	New Zealand	Noted.
<p>Para 7. We suggest adding a new letter, "f", with the following text:</p> <p>"f. Deferred: An audit that is performed through both physical in-person actions and remotely at the same time, either in a synchronous or asynchronous manner. The actions performed are the same as those for conducting an on-the-ground and documentary assessment in a normal audit.</p> <p>This definition includes the idea that in-person and remote activities allow for an adequate audit.</p>	Chile	<p>The Co-Chairs thank Chile for its suggestion of another example of an audit or inspection. In this instance the Co-Chairs are of the opinion that the splitting of an audit or inspection might be a function of the implementation rather than a change to the content of the audit.</p>
<p>Para 7. Remote audit and inspection activities can be considered as either "partial", when only some parts are conducted remotely, or "full", when all parts are completed remotely. Audit or inspection activities which can be conducted remotely, may include, but would not be restricted to:</p> <p>Suggested editorial amendments in Spanish.</p>	Uruguay	<p>The Co-Chairs thank Uruguay for this comment and the translation issue is noted.</p>

<p>Live video-streaming: Where a Food Business Operator (FBO) and/or exporting country competent authority representative will stream live video footage from a business facility and/or official facility as directed and guided by a competent authority representative to observe real-time operating conditions.</p> <p>MY is of the view that the text in Section 4: Types of remote audit or inspection should be consistent in addressing the auditor / auditee</p>	Malaysia	<p>The Co-Chairs note the comments received and have amended and reduced the relevant text to improve readability.</p>
<p>Live video-streaming: Where a Food Business Operator (FBO) and/or exporting country competent authority representative will stream live video footage from a business facility and/or official facility <u>service provider, such as a laboratory, as</u> directed and guided by a competent authority representative to observe real-time operating conditions.</p> <p>To the best of our knowledge “official facility” is not a term commonly used within CCFICS guidance? The key concept here is a place where some form of business or service activity is occurring (as opposed to offices).</p>	New Zealand	
<p>Live video-streaming: Where a Food Business Operator (FBO) and/or exporting country competent authority representative will stream live video footage from a business facility and/or official facility as directed and guided by a competent authority representative to observe real-time operating conditions.</p> <p>Remove “official facility”. The official facility is already represented by the competent authority. This change is for consistency with the scope.</p>	Colombia	
<p>Live video-streaming: Where a Food Business Operator (FBO) and/or exporting country competent authority representative will stream live video footage <u>and data sharing</u> from a business facility and/or official facility as directed and guided by a competent authority representative to observe real-time operating conditions.</p> <p>We propose to add “ .. data sharing” because sometimes data is required to be provided directly during a live streaming audit</p>	Indonesia	<p>The Co-Chairs thank Indonesia for this comment.</p>
<p>Pre-recorded video: Where a pre-recorded video is taken at the request of an auditor or inspector-verifier and electronically submitted to them for assessment.</p>	New Zealand	<p>Noted.</p>
<p>Pre-recorded video: Where a pre-recorded video is taken at the request of an auditor or inspector and electronically submitted to them for assessment.</p> <p>FAO would like to propose to delete this is this is part of "traditional audits"</p>	FAO	<p>The Co-Chairs are of the opinion that there may be significant differences in the timing and use of pre-recorded video.</p>
<p>Off-site desktop review of documentation: Where a FBO and/or exporting country's competent authority will submit documentary evidence for review by a competent authority audit/inspection team to confirm required activities have been undertaken or testing results</p>	USA	

<p>achieved. These data may be supplemented <u>might (could) include</u> by photographic and/or video footage and are typically sent by electronic means such as email. <u>footage.</u></p> <p>Suggest deleting “and are typically sent by electronic means such as email.” This is unnecessary and technology restrictive.</p>		<p>The Co-Chairs have amended the text, taking into consideration comments of members.</p>
<p>Off-site desktop review of documentation: Where a FBO and/or <u>or</u> exporting country's competent authority will submit <u>submits</u> documentary evidence for review by a the relevant national or international <u>competent authority</u> audit/inspection team to confirm required activities have been undertaken or testing results achieved. These data may be supplemented by photographic and/or video footage and are typically sent by electronic means such as email.</p> <p>In system audits the focus is on the competent authority being audited submitting the requested evidence be it their records or the relevant records from the FBO that corroborates the competent authority records.</p> <p>There are two situations being talked about in this paragraph so New Zealand suggests there is reference to the “relevant national or international competent authority”. Identifying down to the level of an audit team is not necessary for this paragraph.</p>	<p>New Zealand</p>	
<p>Off-site desktop review of documentation: Where a FBO and/or exporting country's competent authority will submit documentary evidence for review by a competent authority audit/inspection team to confirm required activities have been undertaken or testing results achieved. These data may be supplemented by photographic and/or video footage and are typically sent by electronic means such as email <u>email and cloud storage.</u></p> <p>We propose to add “ .. and cloud storage” as the example of electronic means, since it also a common electronic means being use.</p>	<p>Indonesia</p>	<p>The Co-Chairs note that examples of technology might best be located in the implementation section or not specified to allow options to be agreed between parties.</p>
<p>Off-site desktop review of documentation: Where a FBO and/or exporting country's competent authority will submit documentary evidence for review by a competent authority audit/inspection team to confirm required activities have been undertaken or testing results achieved. These data may be supplemented by photographic and/or video footage and are typically sent by electronic means such as email.</p> <p>FAO would like to propose deleting this 7c as this is also part of "traditional" audits.</p>	<p>FAO</p>	<p>The Co-Chairs thank the FAO for the comment, and whilst it is true that the desktop audit is part of a physical audit, the Co-Chairs are of the opinion the desktop audit might be amended to reduce the size or activity required in a physical audit or even replace a physical audit where competent authorities agree.</p>
<p>Off-site desktop review of documentation: It should say: Off-site desktop review of documentation: Where a FBO and/or exporting country's competent authority will submit documentary evidence for review by an importing country's competent authority audit/inspection team to confirm (...).</p>	<p>Peru</p>	<p>The Co-Chairs thank Peru for this comment and hopes the concern is addressed by the amended paragraph.</p>

Comment: We suggest adding “an importing country’s” for clarity.		
<p>Remote collection of measurement information: Where a competent authority can access data relayed from measuring devices and equipment for example temperature recordings, or other electronically captured data reported directly to that competent authority (usually within a competent authority jurisdiction) authority.</p> <p>unclear why the parenthetical is needed. If the competent authority doesn’t have jurisdiction, it is unclear why the CA would be requesting or accessing the data.</p>	USA	The Co-Chairs thank USA for this comment and has amended the text.
<p>Remote collection of measurement information: Where a competent authority can access <u>a sample or summary report of</u> data relayed from measuring devices and equipment for example temperature recordings, or other electronically captured data reported directly to that competent authority (usually within a competent authority jurisdiction).</p> <p>For clarity and completeness.</p>	New Zealand	The Co-Chairs thank New Zealand for its comment. The Co-Chairs avoided specifying types of data to be collected which might be broader than that suggested.
<p>Virtual interview: Where an importing country competent authority or auditing body will conduct remote interviews with a FBO and/or the exporting country competent authority to assess compliance, understand systems and processes, and/or evaluate regulatory verification requirements <u>FBO</u>.</p> <p>Remove all text after “and/or the exporting country competent authority.” It is unnecessary and could serve to restrict the use of interviews.</p>	USA	The Co-Chairs thank the USA for their comment. The EWG did not want to restrict this activity to FBO only.
<p>Virtual interview: Comment: The words "an importing country" and "or auditing body" may be deleted.</p> <p>Rationale: The Word “Competent Authority” will cover all applicable authorities.</p>	India	Noted.
Comments on Section 5: Principles		
Para 8. •It would be helpful to acknowledge in this paragraph that many of the basic principles and considerations are the same for both in person and remote audits, but that the nature of remote audits brings additional considerations.	USA	The Co-Chairs have amended the text accordingly.
<p>Principle 1: Remote audit and inspection activities complement and do not and, in some cases, can replace physical/in-person audits or inspections</p> <p>Brazil understands that remote audit and inspection activities are a complement to physical/in-person practices. Nevertheless we also understand that in some cases, these practices can replace the on-site activities, if the authority determines so, based on a risk approach (Principle 3).</p>	Brazil	The Co-Chairs have modified the Principle accordingly, based on comments receievd.

<p>We fully agree with paragraph 9 that describes Principle 1. However, it mentions that “remote audit or inspections activities may be used as the sole regulatory tool for verifying compliance...” we would like to call the attention of the committee if it wouldn't be more appropriate to amend the title of Principle 1 to clearly mention that “in some cases, it can replace physical activities”.</p> <p>In our opinion there is a contradiction between the title of Principle 1 and its description.</p>		
<p>Comment; Burundi proposes to add this statement in para “In case remote was being conducted due to restrictions as soon as restrictions are lifted, physical verification audit/inspection should be conducted immediately”</p> <p>Justification: To read in case remote was being conducted due to restrictions as soon as restrictions are lifted, physical verification audit/inspection should be conducted immediately</p>	Burundi	
<p>Principle 1: Remote audit and inspection activities complement and do not replace physical/in-person audits or inspections</p> <p>the language of the principle seems to be inconsistent with the text and purpose of the document to allow for remote audit and inspection activities to replace in-person audit when appropriate and agreed by relevant parties (e.g., exporting and importing country competent authorities).</p>	USA	
<p>Principle 1: Remote audit and inspection or verification activities complement and do not replace <u>can be complementary to physical/in-person audits or inspections verifications</u></p> <p>Replacing inspection with verification for the reasons noted in our earlier comments. Further Principles are statements of fact and New Zealand agrees with the statements in the following text (paragraph 9), there are situations where remote activities may in fact replace the need for physical / in person audits or verifications. It is therefore not appropriate to definitively state that they ‘do not’ replace physical / in-person verifications.</p>	New Zealand	
<p>Principle 1: Remote audit and inspection activities <u>can</u> complement and do not at times, replace physical/in-person audits or inspections</p> <p>Title of Principle 1 alludes that remote audits cannot replace Physical audits. Para 9 under Principle 1 recognizes that remote audits may be the sole regulatory tool for verifying compliance. Therefore, there may be circumstances when a remote audit may replace onsite audits/inspections.</p>	Mauritius	
<p>Principle 1: Remote audit and inspection activities complement and do not replace <u>complement</u> physical/in-person audits or inspections</p>	Chile	

<p>We request clarification of this text. The title of the principle seems to say that remote audits and inspections, or the remote activities performed as part of them, do not replace physical ones; that is, audits and inspections would have to be conducted physically anyway. In other words, anything that can be done remotely would have to be performed again in person. The wording proposed is one alternative.</p>		
<p>Principle 1: Remote audit and inspection activities complement and do not replace physical/in-person audits or inspections</p> <p>Uruguay does not understand the concept that remote audit and inspection activities “do not replace” physical audits or inspections. Uruguay understands that, once this type of audit is defined in the regulations for the effective delivery of official controls within a country’s NFCS and the assessment of an exporting country’s NFCS, or a relevant part thereof, physical and remote audits/inspections should be equivalent.</p>	<p>Uruguay</p>	
<p>Para 9. Remote audit or inspection activities may be used as the sole regulatory tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their <u>mutual</u> assessment of suitability, compatibility, and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection facility.</p>	<p>USA</p>	<p>The Co-Chairs thank USA, Japan, New Zealand, FAO and Colombia for their comments on this paragraph. Comments have been used to amend the text and improve clarity.</p>
<p>Para 9. Remote audit or inspection activities may be used as the sole regulatory tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their assessment of suitability, compatibility, and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection <u>system/inspected</u> facility.</p>	<p>USA</p>	
<p>Para 9. Remote audit or inspection activities may be used as the sole regulatory tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their assessment of suitability, compatibility, <u>justification</u> and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection facility.</p>	<p>Japan</p>	

<p>RATIONALE: To consider justification and rationality to conduct remote audit is necessary before applying them.</p>		
<p>Para 9. Remote audit or inspection activities may be used as the sole regulatory tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their assessment of suitability, compatibility, and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection facility <u>system or FBO</u>.</p> <p>New Zealand is not sure what an inspection facility is. Suggest this principle be focused on the “system” or the FBO for consistency with the rest of the document.</p>	<p>New Zealand</p>	
<p>Para 9. Remote audit or inspection activities may be used as the sole regulatory <u>assessment</u> tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their assessment of suitability, compatibility, and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection facility.</p> <p>We would suggest replacing «regulatory tool” with “assessment tool” for the reason as described above</p>	<p>Norway</p>	
<p>Para 9. Remote audit or inspection activities may be used as the sole regulatory tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their assessment of suitability, compatibility, and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection facility. <u>Periodic physical inspections and audits could be used as a means to verify accuracy of results.</u></p> <p>FAO considers that the first sentence of this paragraph sounds contradictory with Principle 1 as stated above. we propose some text to better highlight complementarities.</p>	<p>FAO</p>	
<p>Para 9. Remote audit or inspection activities may be used as the sole regulatory tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their assessment of suitability, compatibility,</p>	<p>Colombia</p>	

<p>and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection facility.</p> <p>We suggest removing the phrase “sole regulatory” because it is unnecessary. The paragraph can be clearly understood without it.</p>		
<p>Para 9. Remote audit or inspection activities may be used as the sole regulatory tool are optional assessment tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their assessment of suitability, compatibility, and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection facility.</p>	<p>Malaysia</p>	<p>The Co-Chairs thank Malaysia for their comment and notes the need for flexibility.</p>
<p>Para 9. Remote audit or inspection activities may be used as the sole regulatory tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their assessment of suitability, compatibility, and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection facility.</p> <p>Throughout this document, both "audit and inspection" and "audit or inspection" are used. Are there any difference? If not, just use a single term "audit and inspection".</p>	<p>Japan</p>	<p>The Co-Chairs thank Japan for their comment regarding the use of audit and inspection, verse audit or inspection. The use is contextual and when the comment or statement applies to both, 'and' is used and when only either audit is used or inspection is used, then the text will be 'or'.</p>
<p>Para 9 Remote audit or inspection activities may be used as the sole regulatory tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices. The use of this tool is at the discretion of the participating competent authorities or auditing bodies depending on their assessment of suitability, compatibility, and technological support. Competent authorities should be aware that remote audits or inspections may not be appropriate for all food business operations or competent authorities and the remote nature of the exercise may result in incorrect conclusions being drawn on the compliance of the audited system/inspection facility.</p> <p>Comment: the words "auditing bodies" should be substituted with "the FBOs"</p> <p>Rationale: It may not be appropriate to have unilateral discretion. The readiness of FBOs for remote audit/inspection is equally important to make it participative and efficient.</p>	<p>India</p>	<p>The Co-Chairs note the concern raised. The EWG notes the development of the domestic regulatory framework would be up to the relevant competent authority but as India states it would be wise to discuss with FBO in the development of that regulation.</p>

<p>Para 9. The applicability of remote audit either full or partial has already been mentioned in paragraph 4, Section 4. As such we suggest amendment to the text to indicate that it is an alternative, as follows:</p> <p>Remote audit or inspection activities are optional assessment tool for verifying compliance of a process, facility or NFCS or used in combination with physical/in-person practices.</p>	Malaysia	Noted.
<p>Principle 2: Remote audit and inspection activity best practice aligned to physical audits and inspections</p> <p>•The heading for this principle, as written, is confusing. Perhaps change it to “. . . Remote audit and inspection activity best practices align with physical audit and inspection activities best practices”</p>	USA	The Co-Chairs thank Burundi, USA, Kenya, New Zealand and Mauritius for their comments on this Principle. The Principle has been amended accordingly.
<p>Principle 2: Remote audit and inspection activity best practice aligned to physical audits and inspections</p> <p>Burundi proposes a modification of the title of principle 2 to read “Remote audit and inspection activities should be aligned to physical audits and inspections best practices”. Physical audits should be the benchmark for remote audits as indicated in para 10 Burundi proposes EWG to continue with this work to address the issues raised.</p> <p><i>Taken from Burundi’s comments submitted via CRD.</i></p>	Burundi/Co-Chairs	
<p>Principle 2: Remote audit and inspection activity best practice aligned to physical audits and inspections</p> <p>Comment: Kenya proposes a modification of the title of principle 2 to read “Remote audit and inspection activities should be aligned to physical audits and inspections best practices”</p> <p>Justification: Physical audits should be the bench mark for remote audits as indicated in para 10</p> <p>Kenya proposes EWG to continue with this work to address the issues raised.</p>	Kenya	
<p>Principle 2: Remote-Alignment of remote and physical audit and inspection activity verification best practice aligned to physical audits and inspections</p> <p>To clarify and focus the title on the core concept.</p>	New Zealand	
<p>Principle 2: Remote audit and inspection activity best practice aligned to physical audits and inspections</p> <p>review the title. a word seems to be missing or review as "Best practice principles for physical audits and inspections are equally applicable to remote audit and inspection.</p>	Mauritius	

Title of Principle 2 that seems to depict that physical audits should follow the best practice of remote audits. Remote audit is being bench marked against the physical audits as indicated in para 10 and not vice versa.		
<p>Para 10. Relevant processes for conducting a physical audit or inspection will similarly apply to the remote process, such as notification of the need for an activity, explaining the audit criteria, the scope, standards criteria being applied, assessment preparations, entry and exit meetings, the provision of feedback and draft reports for comment, and other activities as per best practice and international guidance.</p> <p>•For consistency with the systems equivalence document, replace “standards being applied” with “criteria being applied”</p>	USA	Noted.
Para 10. Honduras suggests revising the Spanish translation; perhaps " <i>criterios de la auditoría</i> " would be more appropriate in this paragraph.	Honduras	The Co-Chairs note the translation issue.
Para 10. Relevant processes for conducting a physical audit or inspection-verification will similarly apply to the remote process, such as notification of the need for an activity, explaining the audit criteria, the scope, standards being applied, assessment preparations, entry and exit meetings, the provision of feedback and draft reports for comment, and other activities as per best practice and international guidance.	New Zealand	Noted.
Para 10. The period of notification before a remote audit or inspection should allow sufficient time for the auditee to prepare.	European Union	The Co-Chairs thank the EU for their comment and have reflected this in amended text.
Principle 3: Risk-based Use of a risk-based approach	Mauritius	Noted.
<p>Para 11. Competent authorities should perform remote audit and inspection-verification activities in a manner that is proportionate to <u>the performance of the system and or FBO and risks</u> posed. Consideration should be given to:</p> <p>Performance is a key concept to insert into this principle as the actual risk is ultimately a factor of how well the system or business is controlling the risks for its products and processes.</p>	New Zealand	The Co-Chairs have noted New Zealand's concerns.
<p>Para 11. Bullet 1</p> <p>the frequency of such audits or inspections ensuring that any increase in frequency <u>or urgency</u> because of the remote nature of the audit is <u>and the risks posed are</u> justified; and</p> <p>RATIONALE: to be risk based, frequency and urgency of the remote audit, nature of the risks posed should be considered.</p>	Japan	The Co-Chairs thank Japan, New Zealand, FAO and India for their comments. The text has been amended with these comments in mind.

<p>Para 11. Bullet 1</p> <p>the frequency of such audits or inspections ensuring that any increase in frequency because of verifications is not greater than justified by the remote nature risk posed by the performance of the audit FBO or NFCS regardless as to whether the activity is justified conducted remotely or in person; and</p> <p>New Zealand suggests the key concept to be captured here is that the frequency of any audit is performance and being risk driven, not by the type of audit conducted.</p>	<p>New Zealand</p>	
<p>Para 11. Bullet 1</p> <p>the frequency of such audits or inspections ensuring that any increase in frequency because of the remote nature of the audit <u>or inspection</u> is justified; and</p> <p>to ensure consistency</p>	<p>FAO</p>	
<p>Para 11. Bullet 1</p> <p>Comment: The words "ensuring that any increase in frequency because of the remote nature of the audit is justified" should be substituted with "remains the same as if the physical audits or inspections were being conducted".</p> <p>Rationale: In the name of remote audit or inspection, it may not be appropriate/justifiable to increase to frequency. The others are editorial changes.</p>	<p>India</p>	
<p>Para 11. Add new bullet as follows:</p> <p>- "Consideration of location facilities or production areas"</p> <p>Rationale: We propose to add new bullet since two bullets related to the risk assessment aspect are not adequate.</p>	<p>Indonesia</p>	<p>The Co-Chairs thank Indonesia for their comment.</p>
<p>Para 11. Bullet 2</p> <p>that the scope of remote audits or inspection <u>activities</u> remains the same as if the physical audit was being conducted.</p> <p>Second bullet appears to assume the audit or inspection is 100% remote. If the Guidance is intended to allow for partially remote and partially in person, replace "audits or inspection activities remains" with "audit or inspection activities remain"</p>	<p>USA</p>	<p>The Co-Chairs thank USA, India, New Zealand, Mauritius and FAO for their comments. Noting that depending on the inspection or audit activity conducted, the scope is likely to change, the text was revised in light of comments provided.</p>
<p>Para 11. Bullet 2</p> <p>Comment: After the words "physical audit" the words "or inspection" should be inserted.</p>	<p>India</p>	

Rationale: In the name of remote audit or inspection, it may not be appropriate/justifiable to increase to frequency. The others are editorial changes.		
<p>Para 11. Bullet 2</p> <p>that the scope or intensity of remote audits or inspection remains the same as verifications <u>is not greater than if the physical audit activity was being conducted</u> undertaken physically / in person.</p> <p>Intensity is a key concept to capture in the principle as well. Similarly to the previous bullet, the key concept here is the scope and intensity should not be greater just because it is a remote audit.</p>	New Zealand	
the fact t that the scope of remote audits or inspection remains the same as if the physical audit was-were being conducted.	Mauritius	
<p>that the scope of remote audits or inspection remains the same as if the physical audit <u>and inspection</u> was being conducted.</p> <p>to ensure consistency</p>	FAO	
<p>Principle 4: Remote audit and inspection activities must <u>should</u> be planned and conducted in a cooperative manner</p> <p>RATIONALE: Codex text usually uses “should” instead of “must”.</p>	Japan	Noted and thank you Japan.
Principle 4: Remote audit and inspection-verification activities must be planned and conducted in a cooperative manner	New Zealand	The Co-Chairs have noted New Zealand’s concerns.
<p>Principle 4: Remote audit and inspection activities must be planned and conducted in a cooperative manner <u>especially related to technology capability</u></p> <p>Adding new sentence in the principle 4 tittle to make it more accordance with the explanation contained in para 12.</p>	Indonesia	The Co-Chairs have noted Indonesia’s concerns.
<p>Para 11. Planning and implementation of remote audit and inspection activities should consider the level of technology <u>accessible to the FBO and/or exporting country competent authority</u> has access to, to support the proposed activities. <u>The activities such as the</u> technology available, the internet coverage, the bandwidth of the internet, wireless connectivity impeding structural elements of buildings, and the quality of the handling and presenting of information are just a few elements that can impact the success of the remote activity.</p>	USA	The Co-Chairs have amended the text accordingly.

<p>•agree the planning and conducting of the remote audit should be cooperative; however, the mention of technology doesn't seem to be in alignment with the overall language of the principle.</p>		
<p>Para 11. Planning and implementation of remote audit and inspection activities should consider the level of technology the FBO and/or exporting country competent authority has access to, to support the proposed activities<u>activities and based on agreement between relevant parties</u>. The technology available, the internet coverage, the bandwidth of the internet, wireless connectivity impeding structural elements of buildings, and the quality of the handling and presenting of information are just a few elements that can impact the success of the remote activity.</p> <p>RATIONALE: It is required relevant parties agree how to conduct audit in physical or remote approach taking into account availabilities of IT tools and confidentiality of protecting information of auditee.</p>	<p>Japan</p>	
<p>Para 12. Planning and implementation of remote audit and inspection-verification<u>activities</u> should consider the level of technology the FBO and/or exporting country competent authority has access to, to support the proposed activities. The technology available, the internet coverage, the bandwidth of the internet, wireless connectivity impeding structural elements of buildings, and the quality of the handling and presenting of information are just a few elements that can impact the success of the remote activity.</p>	<p>New Zealand</p>	<p>The Co-Chairs have noted New Zealand's concerns.</p> <p>The Co-Chairs thank New Zealand and FAO for their comments and have amended the text in the document to:</p>
<p>Para 12. Planning and implementation of remote audit and inspection activities should <u>be conducted in a cooperative manner. In particular, this step should</u> consider the level of technology the FBO and/or exporting country competent authority has access to, to support the proposed activities. The technology available, the internet coverage, the bandwidth of the internet, wireless connectivity impeding structural elements of buildings, and the quality of the handling and presenting of information are just a few elements that can impact the success of the remote activity.</p> <p>While the title of the principle includes reference to cooperative manner, the actual paragraph only considers the technology. FAO proposes some text to better connect the title and the paragraph content.</p>	<p>FAO</p>	<p>Para 12. Planning and implementation of remote audit and <u>activities should [FAO: be conducted in a cooperative manner. In particular, this step should]</u> consider the level of technology the FBO and/or exporting country competent authority has access to, to support the proposed activities. The technology available, the internet coverage, the bandwidth of the internet, wireless connectivity impeding structural elements of buildings, and the quality of the handling and presenting of information are just a few elements that can impact the success of the remote activity.</p>
<p>Principle 5: Protection of confidential information</p>	<p>USA</p>	<p>The Co-Chairs thank the USA for this comment but believes some challenges</p>

<p>while the technology is different, the idea of maintaining confidentiality is the same whether the audit/inspection is remote or in person.</p>		<p>are different between remote and physical audit or inspection</p>
<p>Principle 5: Protection of confidential information</p> <p>In order to keep this on a principle level, we would suggest some amendments to ensure that the following is clear: "CA should safeguard the data protection rights of the Citizens of exporting country when engaging in remote audits. Data and documentation disclosed in remote audit are only to be used in accordance with the agreed objectives of the audit. The Parties shall undertake all necessary precautions to prevent any unauthorized access to and use of personal data and confidential information." We understand the first sentence, however we do not consider it a part of a principle, and would suggest that it is deleted here.</p>	<p>Norway</p>	<p>The Co-Chairs thanks Norway, USA, Japan, New Zealand and the EU for their comments. Text amendments made to incorporate member comments.</p>
<p>Para 13. <u>The mechanism used for</u> Information sharing during a remote audit or inspection is different to that during a physical audit or inspection and brings additional challenges. Video-streaming can be captured and shared, and documents presented or sent can be distributed or copied, all increasing the risk to the auditee's right to privacy and protection of intellectual property. Competent authorities should ensure the confidentiality of information/data in line with the relevant legal requirements in their countries. Parties must agree to handle personal and commercially sensitive material in a manner that provides protections and assurances to the auditee regarding confidentiality, including security of ICT access and information collection, storage and handling processes.</p>	<p>USA</p>	
<p>Para 13. Information sharing during a remote audit or inspection is different to that during a physical audit or inspection and brings additional challenges. Video-streaming can be captured and shared, and documents presented or sent can be distributed or copied, all increasing the risk to the auditee's right to privacy and protection of intellectual property. Competent authorities should ensure the confidentiality of information/data in line with the relevant legal requirements in their countries. Parties must<u>should</u> agree to handle personal and commercially sensitive material in a manner that provides protections and assurances to the auditee regarding confidentiality, including security of ICT access and information collection, storage and handling processes. <u>Have policies or written agreement in place to demonstrate adherence of information protection obligations, if necessary.</u></p> <p>RATIONALE: Agreement in information protection between both parties is essential to conduct remote audit due to remote nature.</p>	<p>Japan</p>	
<p>Para 13. Information sharing during a remote audit or inspection is different to that during a physical audit or inspection<u>inspection-verification</u> and brings additional challenges. <u>The auditee's right to privacy and protection of intellectual property should be protected.</u> Video-streaming comes with a potentially heightened risk that it can be captured and inappropriately shared, and as do documents presented or sent can be distributed or copied, all increasing the risk to the auditee's right to privacy and protection of intellectual propertyelectronically.</p>	<p>New Zealand</p>	

<p>Competent authorities should ensure the confidentiality of information/data in line with the relevant legal requirements in their countries. Parties must agree to handle personal and commercially sensitive material in a manner that provides protections and assurances to the auditee regarding confidentiality, including security of ICT access and information collection, storage and handling processes.</p> <p>For clarity and to ensure the key concepts that are to be protected are clearly stated rather than just noted as something that can happen.</p>		
<p>Para 13. Information sharing during a remote audit or inspection is different to that during a physical audit or inspection and brings additional challenges. Video-streaming can be captured and shared, and documents presented or sent can be distributed or copied, all increasing the risk to the auditee's right to privacy and protection of intellectual property. Competent authorities should ensure the confidentiality of information/data in line with the relevant legal requirements in their countries. Parties must agree to handle personal and commercially sensitive material in a manner that provides protections and assurances to the auditee regarding confidentiality, including security of ICT access and information collection, storage and handling processes. <u>When such conditions cannot be guaranteed, the auditee may require a physical audit or inspection</u></p> <p>The guidelines should allow the possibility to require a physical audit or inspection when the security and protection of data cannot be guaranteed.</p>	<p>European Union</p>	
<p>Para 13. Information sharing during a remote audit or <u>and</u> inspection is different to that during a physical audit or inspection and brings additional challenges. Video-streaming can be captured and shared, and documents presented or sent can be distributed or copied, all increasing the risk to the auditee's right to privacy and protection of intellectual property. Competent authorities should ensure the confidentiality of information/data in line with the relevant legal requirements in their countries. Parties must agree to handle personal and commercially sensitive material in a manner that provides protections and assurances to the auditee regarding confidentiality, including security of ICT access and information collection, storage and handling processes.</p>	<p>Japan</p>	
<p>Section 6: Roles and Responsibilities</p>		
<p>Para 14. The roles and responsibilities of the competent authorities and entities to be audited or inspected are similar in remote and physical audit and inspection activities. However, stakeholders may face some additional responsibilities in facilitating these activities to be undertaken remotely, notably the competent authority must: <u>“However, stakeholders may face some additional responsibilities when conducting these activities remotely, notably the competent authority should.”</u></p> <p>To streamline the second sentence, see alternative text.</p>	<p>USA</p>	<p>The comments provided by USA, Japan, Republic of Korea, New Zealand, Norway, FAO and Peru have been incorporated into the amended text.</p>

<p>Para 14. The roles and responsibilities of the competent authorities and entities to be audited or inspected are similar in remote and physical audit and inspection activities. However, stakeholders may face some additional responsibilities in facilitating these activities to be undertaken remotely, notably the competent authority must<u>should</u>:</p> <p>Must is too strong</p>	<p>USA</p>	
<p>Para 14. The roles and responsibilities of the competent authorities and entities to be audited or inspected are similar in remote and physical audit and inspection activities. However, stakeholders may face some additional responsibilities in facilitating these activities to be undertaken remotely, notably the competent authority must:</p> <p>In second sentence, not clear who the “stakeholders” are.</p>	<p>USA</p>	
<p>Para 14. The roles and responsibilities of the competent authorities and entities to be audited or inspected are similar in remote and physical audit and inspection activities. However, stakeholders may face some additional responsibilities in facilitating these activities to be undertaken remotely, notably the competent authority must<u>should</u>:</p>	<p>Japan</p>	
<p>Para 14. The roles and responsibilities of the competent authorities and entities to be audited or inspected are similar in remote and physical audit and inspection activities. However, stakeholders may face some additional responsibilities in facilitating these activities to be undertaken remotely, notably the competent authority must.<u>However, stakeholders may face some additional responsibilities in facilitating these activities to be undertaken remotely, notably the competent authority must:</u></p> <p>Recommend : (Delete 'notably the competent authority must')</p> <p>(rational) Remote audit is used as supplementary tool. Therefore, it is not appropriate to mandate the responsibilities and roles of the competent authorities because the timing and capabilities to reflect them vary depending on the situation of the Member States.</p>	<p>Republic of Korea</p>	
<p>Para 14. The roles and responsibilities of the competent authorities and entities to be audited or inspected-verified are similar in remote and physical audit and inspection verification activities. However, stakeholders all may face some additional responsibilities in facilitating these activities to be undertaken remotely, notably the competent authority must<u>should</u>:</p> <p>Substituting the word stakeholder as it is confusing. Also replacing 'inspection' with 'verification' in line with previous comments. Additionally, Codex refrains from using the terms must and shall except in exceptional circumstances, for this guideline 'should' is the appropriate terminology.</p>	<p>New Zealand</p>	

<p>Para 14. The roles and responsibilities of the competent authorities and entities to be audited or inspected are similar in remote and physical audit and inspection activities. However, stakeholders may face some additional responsibilities in facilitating these activities to be undertaken remotely, notably the competent authority must<u>should</u>:</p>	<p>Norway</p>	
<p>Para 14. the second sentence is somewhat unclear: it starts with "stakeholders may face additional responsibility " and ends with "notably the Competent authority must". what would be the responsibilities of other stakeholders, or should directly replace "stakeholders" with Competent authorities?</p>	<p>FAO</p>	
<p>Para 14. It should say: 14. (...) notably the importing country's competent authority must: Comment: We suggest adding "importing country's" for clarity.</p>	<p>Peru</p>	
<p>Para 14. Bullet 1 Delete 14.a: (Rational) The principle applicable to remote audits is an aid to physical/in-person audits, and it is not appropriate for the competent authority to specify a review of the scheme as a role and responsibility to do so. Instead, it is desirable that the review of the country's system is applied according to the situation of the Member States.</p>	<p>Republic of Korea</p>	<p>The Co-Chairs thank the Republic of Korea for their comments. In this circumstance we believe it is wise for competent authorities to ensure they have a legislative basis for their implementation of this work.</p>
<p>Para 14. Bullet 1 Honduras suggest changing the wording to "<i>revisar la legislación</i>" and adding the term "establish", since legislation may not be fully established in some cases.</p>	<p>Honduras</p>	<p>The Co-Chairs thank Honduras for this comment and the translation issue has been noted.</p>
<p>Para 14. Bullet 2 Establish audit and inspection-verification programs, policies and procedures which outline the conditions and scenarios for the use of remote versus physical audit and inspection-verification activities as appropriate; and</p>	<p>New Zealand</p>	<p>The Co-Chairs have noted New Zealand's concerns.</p>
<p>Para 14. Bullet 3 Provide clear direction to the entities to be audited or inspected (e.g. food businesses, and other competent authorities) on the information and communication technology requirements necessary for successful execution of the remote audit/inspection, <u>and determine whether such requirements are feasible.</u> Paragraph 14c continues to disregard that resolving technology issues may be completely out of the hands of the FBO or competent authority.</p>	<p>USA</p>	<p>The Co-Chairs note the comments from the USA and Indonesia and have incorporated some amendments.</p>

<p>Para 14. Bullet 3</p> <p>Provide clear direction to the entities to be audited or inspected (e.g. food businesses, and other competent authorities) <u>and have capabilities on the information and communication technology requirements necessary for successful execution of the remote audit/inspection.</u></p> <p>Adding "... and have capabilities" since point c explains that the competent authority should provide direction related to the ICT requirements needed for remote audits to the auditee, therefore it needs to be emphasized by adding "have capabilities".</p>	<p>Indonesia</p>	
<p>Para 14. Bullet 3</p> <p>Provide clear direction to the entities to be audited or inspected <u>verified</u> (e.g. food businesses, and other competent authorities) on the information and communication technology requirements necessary for successful execution of the remote audit/inspection <u>audit or verification.</u></p>	<p>New Zealand</p>	<p>The Co-Chairs have noted New Zealand's concerns.</p>
<p>Para 15.</p> <p>Entities to be audited or inspected <u>have the role and responsibility to verified should:</u></p> <p>It is not necessary to repeat the phrase ' roles and responsibility'. New Zealand is not sure this is an obligation. It is only something they may need to do if they want or need to partake in remote audits as opposed to physical ones. Making it an obligation on all entities is heavy handed and overly prescriptive and therefore inappropriate for Codex guidance. .</p>	<p>New Zealand</p>	<p>The Co-Chairs have accepted this amendment.</p>
<p>Para 15. Bullet a</p> <p>Ensure they understand the availability of and have access to necessary technologies to facilitate remote audit and inspection activities when there is a stipulated reasonable requirement from a competent authority. They should clearly indicate their ability <u>the feasibility</u> to engage in remote auditing or inspection, otherwise physical audit or inspection would be the preferred option.</p> <p>Paragraph 15a continues to disregard that resolving technology issues may be completely out of the hands of the FBO or competent authority.</p>	<p>USA</p>	<p>The Co-Chairs thank the USA and New Zealand and have incorporated some amendments.</p>
<p>Para 15. Bullet a</p> <p>Ensure they understand the availability of and have <u>an appropriate understanding of and access to necessary those technologies necessary to facilitate remote audit and inspection verification</u> activities when there is a stipulated reasonable requirement from a competent authority; and b. They should clearly <u>Clearly indicate their ability and commitment to engage in facilitate a remote auditing audit or inspection verification, otherwise or whether a physical audit or inspection verification</u> would be the preferred option.</p>	<p>New Zealand</p>	

Edits to address the concern raised in the preceding comment.		
Section 7: Planning and Implementation		
Para 16. While remote audit and inspection activities will generally follow steps that are similar to the physical versions of these activities, there are important considerations that will contribute to the successful implementation. RATIONALE: redundant	Japan	The Co-Chairs have incorporated this amendment.
Para 16. While remote audit and inspection-verification activities will generally follow steps that are similar to the physical versions of those activities, there are important considerations that will contribute to the successful implementation.	New Zealand	The Co-Chairs have noted New Zealand's concerns.
Para 17. The following points should be taken into consideration <u>by a competent authority</u> when planning remote audit and inspection-verification activities: For clarity and completeness and to replace inspection with verification and align with our previously stated rationale.	New Zealand	The Co-Chairs have noted New Zealand's concerns.
Para 17. We would suggest including the need for an agreed plan which should include the timeframe, name of participants etc. The reason for this would be that planning and executing a remote audit is time consuming and require resources from both the importing and the exporting country. Remote controls should be notified well in advance to ensure sufficient time for planning and both countries must set aside enough time to execute the remote audits in an appropriate manner. Transparency is also a matter, and therefore the name etc of participants should be "open". This is based on our experience with remote audits over a period of time and we would appreciate for example that 30 days in advance is mentioned. We therefore suggest an initial bullet reflecting this	Norway	Co-Chairs felt this is implied throughout the document and part of normal audit process.
Para 17. Bullet a. Frequency: Competent authorities should not unnecessarily increase the frequency or duration of remote audit or inspection activities when compared to physical on-site audits or inspections. This paragraph is repetitive with first bullet of Paragraph 11	USA	Co-Chairs note the comments received. The Co-Chairs have deleted Para 7 as it repeats Para 11 to avoid confusion.
Para 17. Bullet a. Honduras sugiere revisar este texto ya que podría haber duplicidad con el texto en párrafo 11.	Honduras	
Para 17. Bullet a. repetition of similar point made under principles	Mauritius	
Para 17. Bullet a. Comment: The paragraph should be substituted with the following: "Frequency/ Duration: Competent authorities should not increase the frequency or duration of remote audit or inspection activities when compared to physical on-site audits or	India	

<p>inspections. However, duration of remote audit or inspection may be longer in comparison to physical audit or inspection in view of technological challenges associated with such activities.”</p> <p>Rationale: Frequency and duration cannot be looked into from the same yardstick. If competent authorities have the provision to justify the necessity of increased frequency of remote audit or inspection, the same is likely to be misused.</p>		
<p>Para 17. Bullet a. FrequencyFrequency or duration: Competent authorities should not unnecessarily increase the frequency or duration of remote audit or inspection activities when compared to physical on-site audits or inspections.</p>	Japan	
<p>Para 17. Bullet a. MY suggest to use physical on-site audits or inspections for consistent term.</p>	Malaysia	
<p>Para 17. Bullet a. Frequency: Competent authorities should not unnecessarily increase the frequency or duration of remote audit or inspection-verification activities when compared to physical on-site audits or inspectionsverifications.</p>	New Zealand	
<p>Para 17. Bullet a. FAO would like to comment that generally remote audits and inspection take more time, so that could contradict the reference to duration in the paragraph above.</p>	FAO	
<p>Para 17. Bullet a. Frequency: Competent authorities should not unnecessarily increase <u>or reduce</u> the frequency or duration of remote audit or inspection activities when compared to physical on-site audits or inspections.</p> <p>We suggest adding “or reduce”, as indicated.</p> <p>Audits should be conducted with the necessary frequency to ensure that National Food Control Systems (NFCS) meet the established requirements.</p>	Chile	
<p>Para 17. Bullet b. Timing: Where significant time zone differences exist between the location of the auditor and auditee, the hours of operation of the food business should be prioritized when establishing a time for conducting a remote audit or inspection to ensure that remote audit and inspection activities are delivered during standard operation hours.</p> <p>"prioritized" should be replaced with "priority consideration".</p> <p>RATIONALE: improve readability.</p>	Japan	The Co-Chairs note the comments received and have incorporate some amendments put forward by members.
<p>Para 17. Bullet b.Timing: Where significant time zone differences exist between the location of the auditor and auditee, the hours of operation of the food business <u>or competent authority</u> should be prioritized when establishing a time for conducting a remote audit or</p>	Malaysia	

inspection to ensure that remote audit and inspection activities are delivered during standard operation hours.		
Para 17. Bullet b.the hours of operation of the food business or competent authority should	Malaysia	
<p>Para 17. Bullet b. Timing: Where significant time zone differences exist between the location of the auditor and auditee, the hours of operation of the food business should be prioritized when establishing a time for conducting a remote audit or inspection-verification to ensure that remote audit and inspection-verification activities are delivered during standard operation-operating hours- . <u>Similar consideration is also needed when speaking with the competent authority or another regulatory agency, so that one party is not required to be available outside reasonable hours.</u></p> <p>As drafted this is written to only apply to food businesses. Similar consideration should also be given to the competent authority so that personnel are not required to be interviewed in the middle of the night.</p>	New Zealand	
<p>Para 17. Bullet b. Timing: Where significant time zone differences exist between the location of the auditor-auditor, inspector and auditee, the hours of operation of the food business should be prioritized when establishing a time for conducting a remote audit or inspection to ensure that remote audit and inspection activities are delivered during standard operation hours.</p> <p>Ensuring consistency</p>	FAO	
<p>Para 17. Bullet c. Qualifications: Officials or officially recognized bodies conducting the remote audit or inspection should be as appropriately qualified and competent as if conducting a physical onsite audit. There may be a requirement-an additional need for proficiency in the application of any technologies used during the audit or inspection activity.</p>	USA	The Co-Chairs note the comments received and have incorporated suggested amendments from the USA and India.
<p>Para 17. Bullet c. Qualifications: Officials or officially recognized bodies conducting the remote audit or inspection should be as appropriately qualified and competent as if conducting a physical onsite audit. There may be a requirement for proficiency in the application of any technologies used during the audit or inspection activity.</p> <p>Comment: The paragraph should be substituted with the following:</p> <p>“Qualifications: Auditor or Inspector conducting the remote audit or inspection should be as appropriately qualified and competent as if conducting a physical onsite audit or inspection. There may be a requirement for proficiency in the application of any technologies used during the remote audit or inspection activity.”</p> <p>Rationale: In order to bring uniformity in the text (in line with definition in Paragraph 6).</p>	India	

Para 17. Bullet c. Qualifications: Officials or officially recognized bodies conducting the remote audit or inspection-verification should be as appropriately qualified and competent as if conducting a physical onsite audit audit or verification. There may be a requirement for proficiency in the application of any technologies used during the audit or inspection-verification <u>verification</u> activity.	New Zealand	Noted.
Para 17. Bullet c. Para 17. Honduras suggests amending the text as follows: This includes proficiency in the application of any technologies used during the audit or inspection activity.	Honduras	The Co-Chairs have not included this addition as we believe the point is adequately covered.
Para 17. Bullet d. Technology: Where the level of access to the technology required for remote audit or inspection-verification is not adequate e.g. poor or limited videoconferencing connectivity, consideration should be given to:	New Zealand	Noted.
Para 17. Bullet d.1 Comment: The words "assessment" should be substituted with "audit or inspection". Rationale: In order to bring uniformity in the text.	India	The Co-Chairs have incorporated this amendment.
Para 17. Bullet d.1 Whether the adequate access to the relevant technology needed for a remote assessment is a reasonable requirement. <u>—To complete the document</u> Information about the assessment of the audit activity or a conclusion should be included at the end of the document.	Colombia	The Co-Chairs have noted this comment.
Para 17. Bullet d.2 Whether the use of technology remains as the most appropriate approach or whether other types of remote audit (e.g. desktop review of documentation <u>documentation or pre-recorded video</u>) would be able to provide the required level of assurance;	Norway	The Co-Chairs have incorporated this amendment.
Para 17. Bullet d.2. Honduras suggests changing the text to “off-site documentation” since, otherwise, the activity mentioned would not be considered as a remote assessment.	Honduras	The Co-Chairs have noted this comment.
Para 17. Bullet d.5 Both sides agreeing on contingencies when planning remote audit and inspection-verification activities to manage possible interruptions caused by technological failures (e.g. loss of connectivity).	New Zealand	Noted.
Para 18. Implementation This section is detailed and prescriptive. New Zealand does not consider this level is necessary.	New Zealand	The Co-Chairs note New Zealand’s comments.

<p>Para 18. The following should be considered during conduct of remote audit and inspection verification activities:</p>		
<p>Para 18. a Protection of information: Parties conducting remote audit and inspection activities should strive to gather information that can be shared freely without the need for secure channels of transmission. When it is necessary to gather information that is personal or commercially sensitive, the parties who conduct remote audit and inspection activities should arrange for secure lines of transmission of that data. Personal or commercially sensitive information should not be shared with any third party without the consent of the original owner and should be stored and destroyed in a secure <u>secured</u> manner <u>and destroyed</u> when no longer required. ..</p> <p>For clarity</p>	<p>USA</p>	<p>The Co-Chairs thank the US, NZ and FAO for their comments and have incorporated some suggested amendments.</p>
<p>Para 18. a Protection of information: Parties conducting remote audit and inspection verification activities should strive to gather information that can be shared freely without the need for secure channels of transmission. When <u>Where</u> it is necessary to gather information that is personal or commercially sensitive, the parties who conduct remote audit and inspection activities should arrange for secure lines of transmission of that data. Personal or commercially sensitive information should be transmitted over secure channels <u>and should not</u> be shared with any third party without the consent of the original owner and should be stored and destroyed in a secure manner when no longer required.</p> <p>Suggested edits to simplify and focus on the key aspects.</p>	<p>New Zealand</p>	
<p>Para 18. a Protection of information: Parties conducting remote audit and inspection activities should strive to gather information that can be shared freely without the need for secure channels of transmission. When it is necessary to gather information that is personal or commercially sensitive, the parties who conduct remote audit and inspection activities should arrange for secure lines of transmission of that data. Personal or commercially sensitive information should not be shared with any third party without the consent of the original owner and should be stored and destroyed in a secure manner when no longer required. <u>National data protection legislation should be considered in these processes.</u></p> <p>FAO would like to propose to include a reference to data protection legislation in the country.</p>	<p>FAO</p>	
<p>Para 18. a It should say: a. Protection of information: (...) Personal or commercially sensitive information should not be shared with any third party without the consent of the original owner and should be stored and destroyed in a secure manner when no longer required, and evidence of this fact should be provided.</p> <p>Comment: We suggest adding “and evidence of this fact should be provided” so that there may be evidence that the information no longer required has been eliminated.</p>	<p>Peru</p>	<p>The Co-Chairs note this comment however do not support the inclusion for the provision of evidence to prove deletion of evidence.</p>

<p>Para 18. b Feedback: Depending on the actual conditions, both parties may decide whether to include in the closing/exit meeting a discussion and review of the remote audit or inspection-verification process. The auditing or inspecting-verifying party should provide its feedback in written form afterwards<u>during or after the meeting.</u></p>	<p>New Zealand</p>	<p>Noted.</p>
<p>Para 18. c Health and Safety: Best practice work health and safety workplace procedures applied for physical audit and inspection activities remain applicable, for example, for any person who may be instructed to take measurements or record activities. Health and safety procedures should take into consideration the length of activity sessions, differences in time zones and need for breaks to maintain physical and mental wellbeing of all participants.</p>	<p>USA For clarity</p>	<p>The Co-Chairs note the comments received. The Co-Chairs believe it is important to retain 'health and safety' however have moved to after 'workplace'.</p>
<p>Para 18. c Health and SafetySafety for auditor and auditee: Best practice <u>for</u> work health and safety procedures applied for <u>both auditor and auditee of</u> physical audit and inspection activities remain applicable, for example, for any person who may be instructed to take measurements or record activities. Health and safety procedures should take into consideration the length of activity sessions, differences in time zones and need for breaks to maintain physical and mental wellbeing of all participants.</p> <p>Rationale: improve readability</p>	<p>Japan</p>	
<p>Para 18. c Health and Safety: Best practice work health and safety procedures applied for physical audit and inspection-verification activities remain applicable, for example, for any person who may be instructed applicable to take measurements or record remote activities. Health and safety procedures Consideration should take into consideration also be given to the length of activity sessions, sessions and differences in time zones and need for breaks to maintain physical and mental wellbeing of all participantszones.</p> <p>To simply and focus on the key aspects</p>	<p>New Zealand</p>	<p>Noted.</p>
<p>Para 18. c Honduras suggests revising the Spanish translation; perhaps the best term is "<i>seguridad ocupacional</i>". [<i>Translator's note: This suggestion only applies to the Spanish version.</i>]</p>	<p>Honduras</p>	<p>The Co-Chairs note the translation issue identified.</p>