



COVID-19 Derogation Policy 2.0 for Managing Tourism Certification Audits

Photograph: Hotel El Pueblito Iguazu

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Contents

Derogation Policy 2.0 for Managing Tourism Certification Audits.....	4
Derogation policies and exemptions for each tourism certification audit type.....	4
Annual surveillance audits	4
Reassessment audits	5
Corrective Action Verification Audits (CVAs)	6
Initial certification assessments.....	6
Derogation procedures and exceptions for sustainable tourism auditors	6
Final Policy remarks	6

Derogation Policy 2.0 for Managing Tourism Certification Audits

Given the latest developments around the global COVID19 outbreak and considering that many countries and tourism destinations worldwide continue to be under severe constraints affecting gatherings and leisure travel activities, Preferred by Nature (formerly NEPCon) has amended its COVID-19 derogation Policy for tourism audits.

This updated COVID-19 derogation Policy 2.0 for managing tourism certification audits replaces the previous NEPCon Sustainable Tourism Services - Derogation Policy for tourism audits in response to COVID-19 pandemic impacts over the travel sector.

This Policy outlines the criteria for assessing and granting any applicable derogations considered to alleviate the limitations that may affect the ability of any Preferred by Nature Sustainable Tourism Certificate Holders to undergo a regular audit procedure in the year 2021 and the first quarter of the year 2022.

Validity: This Policy and all its related procedures and exceptions are intended to be applicable between 16 of March 2021 until 15 of March 2022.

Preferred by Nature may decide to stop implementing this policy before this period in case improvements to the travel restrictions enable to resume fully normal operations earlier.

Scope: The Policy intends to be a resource applicable to any of the audit types implemented by the Preferred by Nature Sustainable Tourism Certification Services, whose Fieldwork Target Date (FWTD) is set to happen between 16 of March 2021 until 15 of March 2022.

Evaluation to confirm application: The applicability of this Policy must be assessed and confirmed on a case-by-case basis. The implementation of this Policy must prevent that any certificate holder eludes the requirement of its mandatory 2021 audit, unless a valid justification, from those considered herein, is confirmed.

Derogation policies and exemptions for each tourism certification audit type

Annual surveillance audits

- a) If the certificate holder is operational (open to guests or passengers), its scheduled annual surveillance audit must happen following the standard inspection procedure, however the audit may be carried out remotely upon justified cases and when onsite audit is not feasible due to travel or other restrictions. A formal request and the corresponding justification must be submitted, reviewed, and approved for a remote audit to be approved.

In those cases where the request to complete a remote annual surveillance audit is granted, the process must still be completed within the regular timeframe established for the specific certification cycle, which is 30 days prior to 30 days after certificate anniversary date.

- b) If the certificate holder is not operational (100% closed to guests or passengers) at the time when its annual surveillance audit should happen, its fieldwork deadline may be postponed up to 90 days.

If after the granted 90-day extension, the certificate holder operations remain closed to guests or passengers, the annual surveillance audit requirement may be fully waived. In these cases, a certificate handling fee of 25% of the total cost of the waived audit will need to be recognised (paid) by the certificate holder to Preferred by Nature.

- c) Exceptional derogation terms may be granted to certificate holders that despite being operational, demonstrate to be experiencing extraordinary impacts linked to COVID-19 travel constraints and restrictions which inhibit their ability to undergo a regular annual surveillance audit.

If deemed eligible, exceptional derogation terms to annual surveillance audits will consider granting any of the following options:

- A 90-day extension to the fieldwork deadline (FWD) for completing the 2021 annual surveillance audit, provided that this extension does not exceed the date of 30 of November 2021.
- Complete a report of compliance only related to the critical criteria indicators.
- Grant a full audit waive (last resort).

To activate any of the above derogations, a formal request letter describing the operation's situation and the most relevant justifying causes affecting its ability to complete a regular audit must be submitted to Preferred by Nature within 30 days prior to the corresponding certificate anniversary date.

Preferred by Nature will review every request and decide upon its approval based on a risk assessment of each case. The risk assessment will take into consideration all previous audit score(s), history of major nonconformities, location of main operations and its overall situation regarding COVID-19 travel restrictions and impacts.

Reassessment audits

- a) **If the certificate holder is operational (open to guests or passengers)**, reassessment audit must happen within the regular timeframe established for the specific certification cycle (90 to 45 days prior to certificate expiration date) and it can be completed through a partially remote evaluation procedure. In these cases, the onsite visit to supplement a remote evaluation is mandatory.

- b) **If the certificate holder is not operational (100% closed to guests or passengers)** at the time when its reassessment audit should happen, its certificate may be extended up to six months.

If the operations of the certificate holder are reopened to guests or passengers during the term of the six-month certificate extension, the reassessment audit can be completed through a partially remote evaluation procedure and it must be scheduled and at least completed in its remote stage before the new expiration date.

In these cases, if the onsite visit cannot be completed due to lack of time within the initial extension or due to travel restrictions, a new certificate extension for up to six-months may be granted to specifically complete this part of the reassessment process, as long as the remote part of the audit was completed within the length of the initial six-month extension.

If after the granted six-month extension, the certificate holder operations remain fully closed to guests or passengers, the certificate may be extended for a final and extra six-month period and the reassessment audit requirement for year the 2021 will be fully waived. In these cases, a certificate handling fee of 25% of the total cost of the waived reassessment audit will need to be recognised (paid) by the certificate holder to **Preferred by Nature**.

- c) **Exceptional derogation terms to extend the current certificate for up to 12 months.** In cases when a certificate holder clearly demonstrates that it cannot undergo a regular reassessment audit due to travel restrictions imposed at destination, partial closure of operations, reduced financial or technical capacity and/or any other COVID-19 related impacts, it is possible to apply for extension of the certificate for up to twelve-months.

In such cases the re-assessment cannot be waived, and it should either be scheduled and completed before the end of the third quarter of the year 2021, or, if that is not feasible, the 2021 corresponding reassessment audit must be converted into an annual surveillance audit, which may be conducted through a partially remote procedure within its regular timeframe.

To activate any of the above derogations, a formal request letter describing the operation's situation and the most relevant justifying causes affecting its ability to complete a regular reassessment audit must be submitted to **Preferred by Nature** at least 90 days prior to the corresponding certificate expiration date.

Preferred by Nature will review every request and decide upon its approval based on a risk assessment of each individual case. The risk assessment will take into consideration all previous audit score(s), history of major nonconformities, location of main operations and its overall situation regarding COVID-19 travel restrictions and impacts.

Corrective Action Verification Audits (CVAs)

All corrective action verification audits resulting from major nonconformities raised at any audits implemented following the procedures set by this Derogation Policy must be completed within their regular 90-day period.

These audits may be completed through a remote audit procedure, however, the specific audit method and the requirement for including an onsite visit or not, will be determined on a case-by-case basis and according to the following rules:

- a) Corrective actions to address non-conformities issued during assessments must be demonstrated before a certificate can be issued. An onsite visit to update the certificate candidate operation report may be required for this type of CVAs.
- b) Corrective actions to address non-conformities issued during reassessment audits can be demonstrated through a remote audit process.

Initial certification assessments

For these audits, the evaluation procedure can be completed through a partially remote evaluation procedure. In these cases, the onsite visit to supplement a remote evaluation is mandatory, and the audit can only happen if the candidate organisation is operational (open to guests or passengers).

Documentary reviews may be completed through remote evaluation procedures, while interviews and inspection of facilities, vehicles and other physical infrastructure must happen through an onsite visit that allows the auditor to collect -first hand- all required evidence for Preferred by Nature to make any certification decision and, if applicable, issue a certificate.

The supplementary onsite inspection shall be completed as soon as possible and feasible after the remote evaluation. The possibility for this to take place immediately after the remote audit, will be closely monitored. The maximum period between the remote evaluation and onsite inspection is 12 months from the remote review date. After this period, the whole assessment process will need to restart, and the remote evaluation must be repeated to update its findings.

Derogation procedures and exceptions for sustainable tourism auditors

For tourism auditors, the applicable requirement regarding the completion of a minimum number of tourism audits in a single calendar year to maintain tourism auditor competences, is hereby waived for 2021. Competences will be maintained based upon 2019 auditing participation records).

Final Policy remarks

All the derogation alternatives that this Policy offers can only be applied once to the same certificate holder or auditor.

The original version of this policy is the one published in English language. Any controversy regarding the interpretation of the meaning of the derogations published here, must be understood based on the intention of the text in English.

For more information, please contact Preferred by Nature Sustainable Travel Programme Director at sblanco@preferredbynature.org.

About us

Preferred by Nature (formerly known as NEPCon) is an international non-profit organisation working to support better land management and business practices that benefit people, nature and the climate. We do this through a unique combination of sustainability certification services, projects supporting awareness raising, and capacity building.

For more than 25 years, we have worked to develop practical solutions to drive positive impacts in production landscapes and supply chains in 100+ countries. We focus on land use, primarily through forest, agriculture and climate impact commodities, and related sectors such as tourism and conservation. Learn more at www.preferredbynature.org

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