



The Copper Mark Covid-19 Temporary Remote Assessment Policy

Rev 2. April 2021

The current Covid-19 situation is changing the way we do business. At the Copper Mark, health and safety are our number one priority. A key tenant of the Copper Mark Assurance Process is that each of the 32 criteria are assessed on site – either through equivalence or a Copper Mark Assessment. However, in the current circumstances, this is not always possible. As a result, the following Covid-19 Remote Assessment policy is temporarily enacted in order to continue certain assessment activities in a manner that accommodates the global pandemic.

This temporary policy is valid as long as necessary. The Copper Mark may, from time to time, issue new guidance or directives and communicate accordingly.

Remote Assessments: A remote assessment is an offsite assessment where the assessor or assessment team are not physically present at the facility. The scope of the assessment is the same as an on-site assessment, although the format is changed. A remote assessment is a “virtual assessment,” which utilizes technology to visually review components of the assessment that are normally observed in-person. The remote assessment should be differentiated from a desk-top assessment, which only reviews the documents and records of a site.

Format: The remote assessment is conducted through desk-based documentation and record review, live streaming management interviews, and site observations that rely on virtual tours guided by the assessors and using live streaming functionality. Approved assessment firms are responsible to apply or update their internal processes for remote assessment to ensure the highest level of integrity, credibility, authenticity, and in accordance with the Copper Mark Assurance Process.

Eligibility:

- First time assessments **must be conducted onsite**.
- For sites using an equivalent assessment that has been conducted remotely:
 - The Copper Mark will only accept the remote assessment if the equivalent system’s Covid policy on remote assessments is comparable to this policy

- Worker and stakeholder interviews must be conducted on-site
- The remote assessment may be used for “add-on” or “top-off” assessments for criteria that have already been partially assessed on-site through equivalency and for which the missing elements can be reasonably assessed remotely.
- Remote assessments may be used for verification of implementation of improvement plans.
- The sections of the assessment that were conducted remotely must be included in the Copper Producer’s next Site Assessment.
- All other assessments may be eligible for a deadline extension for the Site Assessment in Step 3 or the Improvement Plan in Step 4 as appropriate. Copper Producers interested in an extension should reach out to the Copper Mark.

Process

Each request for a remote assessment must be approved by the Copper Mark.

Copper Producers must submit the following for consideration:

- Request to conduct a remote assessment
- Relevant information to demonstrate the restrictions preventing the assessor from travelling and conducting the on-site assessment *within the Copper Mark timelines*, such as:
 - Government-issued travel restrictions, lockdown policy, transportation restrictions
 - Assessment firm’s travel restrictions, lockdown policy, or transportation restrictions
 - Copper Producer’s policy restricting external visitors from entering the site
 - Other evidence to be evaluated
- The Assessor / Assessment firm’s methodology to conduct the remote assessment

The Copper Mark will review the submitted information:

- **Request for remote assessment:** the Copper Mark will determine:
 - The extent to which to the criterion has already been assessed on-site. Criterion that have had not yet been assessed on-site through the Copper Mark or equivalency are not eligible for remote assessment.
 - Whether any aspects of the Criterion that have not yet been assessed on-site can reasonable be assessed remotely.
- **Relevant information to demonstrate the restrictions preventing the assessor from travelling and conducting the on-site assessment *within the***

Copper Mark timelines: the Copper Mark will determine if there is reasonable evidence to demonstrate the inability to have an on-site assessment within the Copper Mark timelines.

- **The Assessor / Assessment firm’s methodology to conduct the remote assessment:** the Copper Mark will determine if it is in accordance with the Assurance Process.

The Copper Mark will review all relevant information and make a determination. The Copper Mark reserves the right to require the Copper Producer to undergo a site assessment of the criteria that were remotely assessed once this policy is revoked.

With questions, to request an extension, or to request a remote site assessment, please contact info@coppermark.org.