Module -4
Environmental Audit

Non-conformance –corrective and preventive actions

Continual improvement of the EMS can be achieved by identifying nonconformity, correcting nonconformity, and preventing nonconformity from occurring again. Regarding nonconformity and its subsequent corrective / preventive action, organisation or company shall establish, implement and maintain a procedure which defines the responsibilities and authorities to:

- handle and investigate nonconformity;
- take action to mitigate the impacts caused;
- initiate and complete corrective and preventive actions;
- ensure that the corrective or preventive actions taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the environmental impacts encountered;
- record the results of corrective and prevention actions taken;
- review the effectiveness of corrective action and preventive action taken;
- implement and record any changes in the documented procedures resulting from corrective and preventive action; and

Organisation or company shall also ensure that any necessary changes are made to environmental management documentation

Definitions

a) **Nonconformity** (ISO 14001:2004): Non-fulfilment of a requirement.

b) Correction: Action taken to eliminate a detected nonconformity (mitigating an identified nonconformity)

c) Corrective action: Action to eliminate the cause of a detected nonconformity or other undesirable situation (i.e., action taken to prevent recurrence)

d) Preventive action: Action taken to eliminate the cause of a potential nonconformity or other undesirable situation (i.e., action taken to prevent occurrence)

Nonconformity

A nonconformity is any failure to meet a requirement. A requirement can be that of a customer's, statutory or regulatory body, ISO 9001 or your organization's (i.e. Failure to follow a procedure).

(When a nonconformity occurs, you must react to it by either controlling and correcting it or dealing with the consequences. Then you must determine the root cause(s), evaluate the need to eliminate the cause(s) so the nonconformity does not reoccur and implement any corrective action necessary. A corrective action is defined as the action taken to prevent recurrence of a nonconformity)

Types of Non-Conformance

There are two types of non-conformances, major and minor.

Minor nonconformities (a minor deficiency that does not seriously affect the efficiency of the EMS):

- Let's say your organization has a process and procedures, but it is discovered during the audit that one person is not using this correctly or at all. This may be raised as a minor nonconformity.
- Your organization keeps maintenance records to prove machinery is maintained. This is generally done, but one or two instances have been missed.
- A procedure exists, but is not found to be accurate and needs amendment to ensure the process can be followed accurately.

Major nonconformities (a major deficiency that seriously impairs the effectiveness of the EMS):

- The organization has failed to comply with or implement a clause of ISO 14001:2015.
- There is no evidence, or evidence is not substantial enough, of **corrective action**.
- Procedures are missing..

Fixing nonconformities

Non conformity and corrective action

The audit process, whilst evaluating the performance of an organization, can bring about non conformities and resulting correction actions. A non-conformity can occur in an organization at any time whilst undertaking its processes.

A methodology to capture, manage and resolve needs to be undertaken and the Standard asks for the following:

1. React to the nonconformity and, as applicable:

- take action to control and correct it;
- deal with the consequences, including mitigating adverse environmental impacts;

2. Evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:

- reviewing the nonconformity;
- determining the causes of the nonconformity;
- determining if similar nonconformities exist, or could potentially occur

3. Implement any action needed;

4. Review the effectiveness of any corrective action taken;

6. Make changes to the environmental management system, if necessary"

The organization shall retain documented information as evidence of:

a) the nature of the nonconformities and any subsequent actions taken;

b) the results of any corrective action.

(The Standard says that this process should be documented. There are various ways to achieve this but usually this comprises a "Corrective Action Request" (CAR) for each corrective action and a "log" which is essential to record and manage the CAR's. This is especially useful where numerous corrective actions are raised.)

The “log” can be as simple as:

Audit date:	Non conformity description	Responsibility:	When due:	Action taken:	Date non conformity closed:

Prevention Action

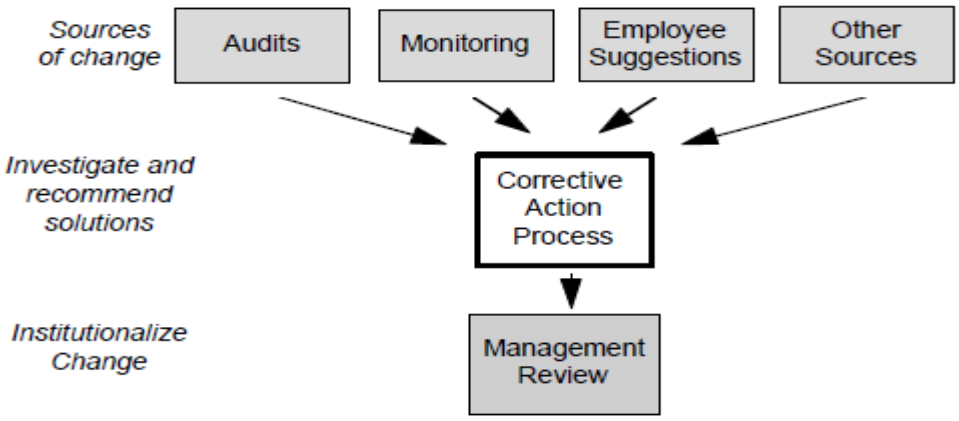
As per **Annex A** (**Guidance on the use of ISO 14001:2015 standard**) of ISO 14001:2015 standard it further explains:

One of the key purposes of an environmental management system is to act as a preventive tool. The concept of preventive action is now captured in Clause 4.1 (understanding the organization and its context) and clause 6.1 (i.e. actions to address risks and opportunities).

Explanation:

The Standard requires that the organization shall establish and maintain procedures for controlling non-conformities and for taking corrective action to mitigate any impacts caused. No EMS is perfect. You will probably find problems with your system, especially in the beginning through audits, measurement, or other activities. Your EMS will also need to change as your organization changes and grows. When system deficiencies are encountered, your organization will need a process to ensure that:

- problems including nonconformities are investigated;
- root causes are identified;
- corrective actions are identified and implemented; and,
- corrective actions are tracked and documented.



References

1. ISO 14001 – Environmental Management systems – Requirements with guidance for use
2. https://www.nqa.com/medialibraries/NQA/NQA-Media-Library/PDFs/NQA-ISO-14001-Implementation-Guide.pdf

3. https://advisera.com/14001academy/blog/2015/11/02/dealing-with-nonconformities-from-the-iso-140012015-certification-audit/
4. https://isoconsultantkuwait.com/2019/06/23/1953/
5. https://www.epd.gov.hk/epd/misc/env_management_sme/e_e/eng/um_main3.htm

Corrective and Preventive Action Tracking Log (F-011.02)

CAR #	Issue Date	Area/ Department	Problem Description	Corrective Action Completion Date	Preventive Action Completion Date	Closure Date

KALYANI FORGE LTD.	IQA No. :-
NON CONFORMANCE REPORT	NCR No. :-
Process	Audit Date :-
Auditee :	Auditor :-
Procedure:	Rev:

(NOTE:- Please write in CAPITAL LETTERS Only.)

A. Details of Non conformance :-

Objective evidence :-

Clause Ref. : **Customer Specific Req.:-**

NC closing date : (Not to exceed more than 15 days)

Auditor Name. **Auditee Incharge Name.**

B.Disposition / Immediate action on NC :-

C. Root Cause :

1) Why?

2) Why?

3) Why?

4) Why?

5) Why?

D.CAPA Details (Actions to eliminate the cause).	Resp.	Target Date

E. CAPA Impact - Applicable / Not Applicable	Resp.	Target Date