



**ISO 14001 4.5.2
NON-CONFORMANCE,
CORRECTIVE AND
PREVENTIVE ACTION**



Lesson Learning Goals

At the end of this lesson you should be able to:

- Distinguish between major and minor non-conformances using examples
- Describe the difference between corrective and preventive action
- Summarize the steps in identifying and resolving non-conformance
- Describe the difference between fixing a symptom and changing the system
- State at least two major benefits of effective corrective and preventive action

What is a Major Non-Conformance?

A deficiency that seriously impairs the effectiveness of the EMS

Examples:

- An element of ISO 14001 not implemented
- Procedures not developed or not implemented
- Failure to take corrective or preventive action
- Several minor non-conformances

What is a Minor Non-Conformance?

A minor deficiency that does not seriously impair the effectiveness of the EMS

Examples:

- One or a few individuals (out of many) do not use a procedure correctly
- Procedure needs minor changes to be effective
- One or a few records incomplete

What are Corrective and Preventive Actions?

- Corrective action fixes the immediate problem (e.g., repair a leaking valve)
- Preventive action is designed to stop the problem occurring again, or stop problems before they happen (e.g., improved maintenance procedures)
- Effective preventive actions are a key to **CONTINUAL IMPROVEMENT**

ISO 14001 Non-Conformance, Corrective and Preventive Action says:

The organization shall establish and maintain procedures for defining responsibility and authority for handling and investigating non-conformance, taking action to mitigate any impacts caused, and for initiating and completing corrective and preventive action

ISO 14001 4.5.2 also says:

Any corrective and preventive action taken to eliminate the causes of actual and potential non-conformances shall be appropriate to the magnitude of problems and commensurate with the environmental impact encountered

Steps to Identify and Correct Non-Conformance

- Identify problem through routine inspection, monitoring, audit findings, trend analysis, employee comments, complaint, experience
- Investigate problem and its underlying causes. Involve persons with first-hand knowledge of the issues, and authority to achieve solutions
- Identify best solution(s) and persons responsible for implementing them

More Steps to Identify and Correct Non-Conformance

- Ensure solution is adequate for the size and nature of the problem, i.e., fix the underlying cause(s) once and for all
- Follow-up with monitoring to confirm that implemented solution is effective long-term
- Involve people throughout with sufficient influence to 'make things happen' promptly

Non-Conformance Investigation Example

PROBLEM:

- Environmental monitoring results not submitted to government on time

Possible underlying causes:

- » Responsibility for reporting not clearly communicated
- » Inadequate training or awareness of reporting schedule requirements
- » Written procedure not available
- » Insufficient supervision and checking

Principles of Corrective and Preventive Action

- Don't ignore problems and hope they'll go away

Ask:

Who? What? When? How? Where? WHY?

until you arrive at the root cause of the problem

- Fix deficiencies in the **system**, not just **symptoms** of the problem

One More Thing from ISO 14001 4.5.2

The organization shall implement and record any changes in the documented procedures resulting from corrective and preventive action

This means that procedures must be kept up to date (i.e., maintained) to include new actions required to prevent previous problems

Consequences of Non-Conformance

MAJOR NON-CONFORMANCE

- Registration to ISO 14001 delayed until problem is corrected and re-audited

MINOR NON-CONFORMANCE

- Can receive registration to ISO 14001 but must commit to fix problem within 60 days; correction will be confirmed on next audit

More Consequences of Non-Conformance

- EMS is an inter-dependent system; if one component is defective, the whole system is broken
- One problem usually leads to another; pay now or pay much more later if first problem, and underlying causes, is not fixed quickly

Concluding Thoughts

Important points to remember are:

- Need open communication, without fear of punishment for identifying a non-conformance
- Need somebody with authority in charge of responding to non-conformances
- Need thorough investigation of symptoms and underlying causes of each non-conformance involving knowledgeable persons and those affected by the non-conformance

Concluding Thoughts (Cont'd)

Additional points to remember are:

- Need identification and implementation of lasting solutions that change the system (i.e., the way things are done), not just the symptoms
- Need follow-up to ensure the solution provides lasting improvement
- Need update documented procedures to include corrective and preventive actions