

ISO 14001 NONCONFORMANCE AND CORRECTIVE AND PREVENTATIVE ACTION (4.5.2)

In order to be in conformance with this provision of ISO 14001 an organization must be able to answer the overall question: "How does the organization handle nonconformance with respect to the EMS?". In order to answer that question three specific tasks must be addressed under the Nonconformance and Corrective and Preventative Action section of the standard. First, the organization shall develop a procedure for investigating a nonconformance from the established environmental management system. The procedure must include responsibility and authority for the investigation process. Second, the organization must take the necessary actions to mitigate impacts related to the nonconformance. Third, the organization will need to modify existing procedures based upon the results of the corrective and preventative analysis phase of the investigation in order to prevent future nonconformance.

The purpose of this section of the standard is to provide a process to do the following:

- A. document the nonconformance;
- B. notify those responsible for the mitigation of the nonconformance;
- C. investigate the cause of the nonconformance;
- D. establish a corrective action to prevent reoccurrence;
- E. modify the existing procedure as a preventative action; and,
- F. communicate the changed procedure to the necessary activities within the system.

Where does the evidence of a nonconformance originate? The obvious answer is that they can arise within the overall internal reporting system of the environmental management system. However, nonconformance issues can arise from external sources such as suppliers, end users or other stakeholders. There must be recognition of the potential for external communication relating to nonconformance.

Questions That Need To Be Answered:

The following questions need to be answered in order to determine whether the Nonconformance and Corrective and Preventative Action Section meets the intent of ISO 14001:

1. Does the organization have an established procedure for defining responsibility and authority for:
 - a. investigating nonconformance?
 - b. initiating mitigation activities?
 - c. performing corrective action?
 - d. completing preventative action?
2. Does the organization modify existing procedure when appropriate to prevent nonconformances?