

Non-conformance and Corrective and Preventive Action

1.0 Purpose/Scope

This procedure defines the responsibilities and process for identifying and investigating non-conformances with the *Facility/Plant Name* environmental management system, for taking action to mitigate any negative impacts caused, and for applying corrective and preventive actions.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

Corrective and Preventive Action Request (CAR)

4.0 References

- 4.1 EP-003 Environmental Management System and Regulatory Compliance Audits
- 4.2 EP-006 Emergency Preparedness and Response
- 4.3 EP-010 Environmental Communication
- 4.4 EP-012 Environmental Document Control
- 4.5 EP-015 Monitoring and Measurement
- 4.6 ISO 14001:1996, Element 4.5.2

5.0 Definitions

None

6.0 Exclusions

None

7.0 Procedure

- 7.1 Where non-conformances or non-compliances are identified through the environmental audit process, the responsible and accountable area or department representative, affected area or department manager, audit team member or EMR, as specified in EP-003, is responsible for:
 - a) Identifying the root cause(s) of non-conformances or non-compliances
 - b) Identifying appropriate corrective and preventive actions (including modifying or creating environmental procedures and work practices)
 - c) Planning and implementing corrective and preventive actions
 - d) Verifying the close-out and effectiveness of corrective and preventative actions

- 7.2 Where non-conformances are identified outside the environmental audit process, the Quality Manager or designee will generate a CAR, as appropriate, in accordance with EP-003. The affected area or department manager or designee is responsible for:
 - a) Identifying the root cause(s) of these non-conformances
 - b) Identifying appropriate corrective and preventive actions (including modifying or creating environmental procedures and work practices)

- c) Planning and implementing corrective and preventive actions
- d) Verifying the close-out and effectiveness of corrective and preventative actions

The Quality Manager or designee will verify proper implementation of corrective and preventive actions.

- 7.3 Where non-compliances are identified outside the environmental audit process, the EMR or designee will generate a CAR, as appropriate. The CAR will then be addressed as specified in EP-003.

8.0 General Rules

- 8.1 All incidents, accidents, spills, releases and emergencies shall be dealt with through environmental procedure EP-006 (Emergency Preparedness and Response).
- 8.2 A corrective and preventative action request (CAR) shall be used for recording non-conformances (Note: a non-compliance is a non-conformance) and corrective and preventative actions as indicated in EP-003 or in step 7.2 of this procedure.
- 8.3 Action Plans may be used where appropriate for planning, scheduling and managing corrective and preventative actions.
- 8.4 Environmental procedures (EPs), environmental work practices (EWPs) and/or training programs shall be modified and/or created where necessary to establish adequate controls for avoiding repetition of non-conformances and non-compliances.

9.0 Records

Records shall be retained consistent with EP-013.

Record of Revisions

Revision Date	Description	Sections Affected