

# USDA FOREST SERVICE



## Pike/San Isabel National Forests and Cimarron/Comanche National Grasslands ENVIRONMENTAL MANAGEMENT SYSTEM GUIDEBOOK

Document No.	Revision Date	Person Responsible for Document	Approved By	Date Approved	Page
EMS Guide	02/13/2007	EMS Management Representative	Robert Leaverton, Forest Supervisor	03/21/2007	Page 1 of 3

### 4.5.3 – NONCONFORMITY, CORRECTIVE ACTION AND PREVENTIVE ACTION

#### ISO 14001 REQUIREMENTS

*This element describes procedures to deal with nonconformities with the EMS. These procedures include: identification and investigation of nonconformities, recommendation and implementation of preventive or corrective actions, and review of the effectiveness of such actions.*

#### PURPOSE

This procedure establishes a process for defining, identifying, investigating, and documenting EMS actual and potential nonconformities in the PSICC EMS. This procedure also establishes a process to mitigate, prevent, and implement corrective actions related to EMS nonconformities. Actions taken to address nonconformities are appropriate to the magnitude of the problems identified and the environmental impacts encountered.

#### SCOPE

This procedure applies to all EMS nonconformities defined as situations or actions that do not fulfill the requirements of the PSICC EMS.

#### DEFINITIONS

**Corrective Action** – Action to eliminate the cause of a detected nonconformity.

**Environmental Management System** – The part of an organization's management system used to develop and implement its environmental policy and manage its environmental aspects.

**Nonconformity** – Non-fulfillment of a requirement.

**Preventive Action** – Action to eliminate the cause of a potential nonconformity.

#### PROCEDURES AND RESPONSIBILITIES

Non-conformities are defined as a non-fulfillment of a requirement. Requirements include EMS requirements as well as legal and other requirements. Identification of non-conformities followed by implementation of preventive and/or corrective actions is an effective tool used to achieve continual improvement of the EMS and to prevent recurrence of the non-conformance.

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EMS Guide	02/13/2007	EMS Management Representative	Robert Leaverton, Forest Supervisor	03/21/2007	Page 2 of 3

The following are the procedures for addressing nonconformities and for taking corrective and preventive actions.

1. Nonconformities or corrective/preventive actions can be identified in the following ways:
  - a. All Forest employees, or persons working on behalf of the agency, have the authority and responsibility to bring suspected environmental non-conformities to the attention of their District Ranger or Staff Officer and to the attention of the EMS Representative through the use of Form 4.5.3.1, the [Nonconformance and Corrective Action Request Form](#).
  - b. In some cases, a situation may not be clearly understood as a “non-conformance” or an employee may want to suggest improvements to current or future operations. Thus, the option exists for employees, or persons working on behalf of the agency to submit a [Nonconformance and Corrective Action Request Form](#) with their District Ranger or Staff Officer and to the attention of the EMS Representative.
  - c. Internal EMS audits, evaluations of compliance by Forest program managers and other program reviews may identify items. These findings are provided to the Forest Supervisor. Form 4.5.3.1, the [Nonconformance and Corrective Action Request Form](#) will be used to document these items.
2. The District Ranger or appropriate Forest Staff Officer is responsible for completion of identified corrective or preventative actions. The District Ranger/Staff Officer reviews each submitted form, determines the type of process that should be initiated and assigns the action to the responsible person. The EMS Representative will be consulted as needed.
3. The EMS Representative maintains a [Corrective/Preventive Action log](#) of non-conformance and corrective action submittals. Within the log, the disposition, status, and resolution of the submittals are tracked. In some cases, the comment may be intended for improving EMS or environmental performance and thus, may call for changing future operations. In other cases, immediate corrective or preventive actions may be needed to address a specific activity. **All corrective or preventive actions will be appropriate to the magnitude of the problems and the environmental impacts encountered. This process shall not delay any need for immediate action.**
4. The following are steps to follow for investigating non-conformances:
  - District Ranger/Staff Officer identify the root cause of the non-conformance in order to avoid their recurrence,
  - District Ranger/Staff Officer identify and implement the necessary corrective actions,
  - District Ranger/Staff Officer record changes to procedures resulting from the corrective and preventive actions,
  - EMS Representative reviews the effectiveness of corrective and preventive actions, and
  - District Ranger/Staff Officer and the EMS Representative document all steps on EMS [Nonconformance and Corrective Action Request Form](#).

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5. When the EMS Representative accepts the corrective or preventive action as complete, the Forest Supervisor approves closure of the nonconformance. Where relevant, lessons learned from the non-conformance or corrective action reporting are shared with the Forest Leadership Team, employees, or persons working on the behalf of the agency.
6. The results from internal audits, evaluations of compliance, corrective/preventive actions, and recommendations for improvement are included in the Management Review (Element 4.6) and reviewed for further actions. Modifications of the EMS related to corrective and preventive actions are the responsibility of the EMS Representative, EMS Team, and the Forest Supervisor.
7. Completed EMS Corrective/Preventive Action Request forms are retained as environmental records in the 1331 files in Supervisor's Office in accordance with [Element 4.5.4 – Control of Records](#) of this manual.