




MP 4

Nonconformities, Corrective and Preventive Actions Management Procedure

Revision list


Revision no.	Description	Written By/ Revised By	Date
0	First issue	C. Abela	04.10.2010
1	Modified MP to current Audit Follow-up practices	R. Tabone & S. Scicluna	05.07.2013
2	Modified MP to current Audit Follow-up practices	R. Tabone & S. Scicluna	02.05.2014

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1 Aim and scope

The objective of the procedure is to define responsibilities and detailed rules used by EMC to identify nonconformities (NC) and their root causes, plan and carry out corrective actions (CA) and preventive actions (PA).

The aim of the NC, CA and PA is to address and eliminate the root cause or potential nonconformities in order to improve the EMS performance.

This procedure is also aimed to record and keep track of environmental NCs identified by other sections within EMC, such as Fire Section and Health & Safety Section.

The procedure is applicable to all EMC activities within the EMS scope.

2 References

EN ISO 14001:2004, clause 4.5.3

3 Terms and Definitions

EMC Enemalta Corporation

NC Nonconformity:

- non-fulfilment of a requirement

CA Corrective action:

- action taken to eliminate or control the effect (or impact) of a detected nonconformity or other undesirable situation

Note 1: There can be more than one cause for a 'nonconformity'.

Note 2: A Corrective action shall also prevent recurrence of the same incident.


PA Preventive action:

- action taken to eliminate the effect (or impact) of a potential nonconformity or other potentially undesirable situations.

Note 1: There can be more than one cause for a potential nonconformity.

Note 2: A Preventive action is taken to prevent occurrence of an incident before occurring in the first place.

NC Register This is a register containing the records for NC and corresponding CA and PA. This register is in the form of a database application.

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4 Responsibilities

Management Representative (MR)

- provides resources for CA and PA as required
- ensures that there is good communication amongst other EMC sections which may identify environmental non-conformities

Environmental Coordinator (EC)


- verifies the records entered in the NC Register against the audit reports of each respective internal audit
- closes off the action plan when all issues have been tackled
- forwards to the Lead Auditor any inspection reports received by other EMC section which include environmental related NCs
- forwards to the Lead Auditor the filled in **FRM 1.1 - Quarterly HSE Inspections Progress Report** and **FRM 1.2 - Quarterly Fire Section Inspections Progress Report**

Environmental Representative (ER):

- controls NC, CA, PA management within his competence
- verifies the implementation of the CA and PA
- gives support to the Lead Auditor to manage NC, CA and PA

Lead Auditor

- plans, coordinates the audit, defines audit conclusions and prepares the audit report
- issues Action Plans in case any non-conformances and/or recommendations are identified during the audit
- assesses the effectiveness of the CA, in collaboration with ER and section responsible person
- updates the NC register and follows up the implementation of CA and PA arising from internal audits carried out
- includes NCs and recommendations arising from inspections carried out by other EMC sections such as Health and Safety section and Fire Section.
- updates the NC register, following communication from other EMC sections such as Health and Safety section and Fire Section.

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- issues **FRM 1.1 - Quarterly HSE Inspections Progress Report** and **FRM 1.2 - Quarterly Fire Section Inspections Progress Report** to other EMC sections conducting inspections with all their NCs/recommendations raised and status.

EMC Fire Section and EMC H&S Section

- informs EC of any inspection carried out which includes any environmental related NCs/recommendations.
- informs EC of any update or closure of NCs/recommendations reported
- fill in the **FRM 1.1 - Quarterly HSE Inspections Progress Report** or **FRM 1.2 - Quarterly Fire Section Inspections Progress Report** and revert back to the EC with the update/closure of the reported NCs/recommendations

5 Detailed procedural rules

5.1 Identification of NC

NC or other undesirable situations may be identified as follows:


- by internal or external auditors,
- by inspections carried out by other EMC sections
- by any EMC staff;
- following internal/external communications.

In the case of (i), when audits are carried out internally by the Lead Auditor, the latter issues an audit report to the auditees and personnel concerned, including any recommendations or nonconformities detected.

In the case of (ii), the communication flowcharts **DOC 15 - Communication flow between Fire and RAO** and **DOC 16 - Communication flow between H & S and RAO** are to be followed.

In the case of (iii), when EMC staff identifies an undesirable situation, the person who has identified the situation shall describe to the competent ER or EC what has happened. The ER shall inform the EC accordingly.

The communication may occur either by phone, e-mail or in writing using the **Internal Environmental Communication Form (Annex 1)** or by any other means of communication. It is not mandatory to use the **Internal Environmental Communication Form**; however it is effective in communicating complete and pertinent information.

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A communication regarding potential non conformities can also be sent.

The EC or competent ER, whoever receives the communication, shall evaluate the situation. He can ask for more information to the person who sent the communication or to any interested parties.

5.2 Planning CA

Once the auditees approve the audit report, the NCs and Recommendations will be entered in the NC register. The EC will verify against the internal audit reports that all nonconformities and recommendations issued have been registered in the NC register. The Lead Auditor will also monitor the NC and recommendation status.

In the case of EMS related internal and external audits, the Lead Auditor shall issue an **Action Plan Form (Annex 2)** in the event of any NC or Recommendation. The action plans shall be addressed to the concerned ER, responsible person and his direct superior.

The ER shall:

- propose to the EC, Lead Auditor and to the responsible engineer(s) involved in the situation the immediate course of action to be taken in order to eliminate or minimise consequences;
- together with the Lead Auditor and with the responsible engineer(s) involved in the situation, analyse and identify the cause/s for the NC/undesirable situation;
- decide if a CA is needed to rectify the problem;
- in the case of a potential NC, decide on the PA required;
- propose the CA or PA and the responsible for the CA/PA.

The responsible person(s) will allocate the necessary resources to implement the CA/PA.

The responsible person(s) of each item in the action plan shall carry out the planned activities using the available resources and shall inform the Responsible Engineer, the ER and the Lead Auditor of any problem that might occur.

The Lead Auditor shall monitor the status of the action plan, verify its completeness and shall update the NC Register accordingly.

The EC shall be informed by the Lead Auditor of all pending action plans and shall assess the effectiveness of the actions and check the coherence between all EMC corrective and preventive actions.

5.3 Checking and closure of action plans

Whilst in the planning stage, the ERs and responsible person(s) shall define the effective benefit of the action plan (elimination of the cause/s for potential or identified NCs) and will plan on carrying out a check on the effectiveness of the actions. The verification shall be carried out by the Lead Auditor after the completion of the action plan. Internal audits can also be planned to check the effectiveness of the CA/PA. The process flow for the NC and CA process flow is shown in Figure 1.

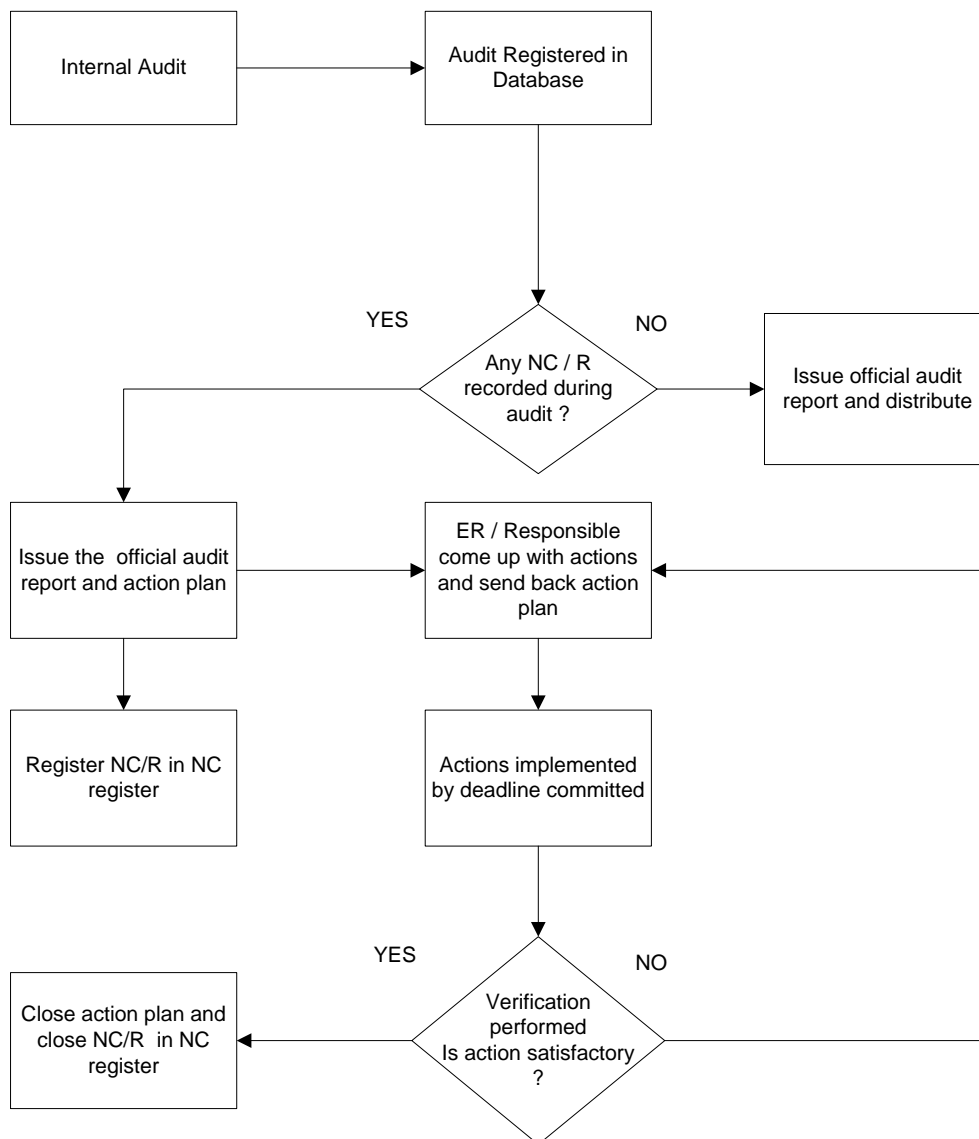



Figure 1 A flow chart representing the NC and CA process flow

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5.4 Records

The Lead Auditor shall keep all the action plans and internal environmental communication forms and is to inform the Document Controller about any modifications to EMS documents that are necessary as a result of the implementation of the CA or PA.

6 Reference documents


Non Conformance Register (NC Register)

FRM 1.1 - Quarterly HSE Inspections Progress Report

FRM 1.2 - Quarterly Fire Section Inspections Progress Report

DOC 15 - Communication flow between Fire and RAO

DOC 16 - Communication flow between H&S and RAO

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Annex 1

Internal Environmental Communication Form



Internal Environmental Communication Form

Name:


Date:

Please write your question/remark or describe what happened
(Short and clear description)

Where it happened?

When?

Other people involved

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Annex 2

Action Plan Form



Action Plan Form

(To be filled in by ER, EC or MR as applicable)

ER, EC or MR:

Sig.:

Action plan no. _____

Action plan issued on the basis of:

Date of issue _____

- ☐ Internal non conformity, recommendation
☐ Non conformity, recommendation issued by third party
☐ Objective, target
☐ Legal requirement
☐ Other, specify: _____

Reference to non conformity / recommendation / objective and target / legal requirement / other:

Informed people (Environmental Representative involved):

Person responsible for the action:

Item	NC/ R	Single action, task	Resp.	Means, resources	Deadline	Date of final check



Describe how to assess the effectiveness of the action:

Signature

Date

Comments / effectiveness of the action (*by EC*)

Signature

Date: