



Verification	Originator	Approved	Issued
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Title: COFL-FF-EP-4.5.3-1 Nonconformity, Corrective Action and Preventive Action Procedure

Person responsible: Program Manager

Area of application: Fleet Fenceline

Document location: www.fortlauderdale.gov/ESMS

Revisions

Rev. No.	Date	Description
001	8/8/16	Minor text update
002		

Recurring action items

Activity	Responsibility	Frequency
1. Identify Corrective Action Requests (CARs) and Preventive Action Request (PAPs) based upon findings of audit it conducts, or audits of second or third party.	Area Supervisors/Program Manager	As necessary
2. Implement corrective action schedules, and ensure nonconformance is resolved (closed)	Area Supervisors/Program Manager	As necessary
3. Correct nonconformance identified in his/her department or area	Area Supervisors/Program Manager	As necessary

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1.0 Purpose

- 1.1 This procedure establishes practices related to the identification, implementation and tracking of corrective and preventive action related to environmental audits, environmental compliance evaluations, and environmental inspections of the City of Fort Lauderdale.
- 1.2 This procedure describes the process to investigate environmental nonconformities, to determine their cause, to mitigate the environmental impact of nonconformities, to avoid their reoccurrence and to record the results achieved.

2.0 Scope

- 2.1 This procedure conforms to element 4.5.3 *Nonconformity, Corrective Action and Preventive Action* of the ISO 14001:2004 standard, and covers operations of the City of Fort Lauderdale.
- 2.2 This procedure includes preventive action to prevent potential nonconformities.

3.0 Responsibility

- 3.1 The **Management Representative** will:
 - 3.1.1 Remain informed of audit findings, particularly any nonconformance, and follow up on the necessary corrective actions.
- 3.2 The **Internal Self-Audit Team** will identify the Corrective Action Requests (CARs) and Preventive Action Proposals (PAPs) based upon its audit findings, and the findings of a second or third party auditor.

The team will also:

 - 3.2.1 Record on the appropriate CAR and PAP forms any nonconformance observed during an audit;
 - 3.2.2 Verify the completeness and effectiveness of the CARs or PAPs with the **Program Manager**.
- 3.3 The **Internal Self-Audit Team** will perform the above described tasks for the audits it conducts.
- 3.4 The **Program Manager and ESMS Coordinator** will coordinate a Corrective and Preventive Action Program by:
 - 3.4.1 Maintaining documentation of CARs, PAPs, and other related documents obtained during ESMS Internal Audits, Environmental Compliance Evaluations, second- or third-party audits, or inspections by regulatory agencies or other authorities;
 - 3.4.2 Reviewing and signing CARs and PAPs;
 - 3.4.3 Implementing corrective action schedules;
 - 3.4.4 Ensuring nonconformance is resolved (closed);



3.4.5 Recommending to the **Management Representative** any changes to procedures or documents resulting from the CARs or PAPs.

3.5 The appropriate **Area Supervisor** will:

3.5.1 Correct the nonconformance identified in his/her department or area;

3.5.2 Document the implemented corrective action and preventive action on the proper forms and deliver completed forms to the **Program Manager**.

4.0 Definitions

4.1 Refer to **COFL-FF-EP-4.4.4-2 Related Definitions Procedure**

4.1.1 **Internal ESMS Audit** – refer to ESMS document **COFL-FF-EP 4.5.5-1 Internal ESMS Auditing** procedure;

4.1.2 **Compliance Evaluation** – refer to ESMS document **COFL-FF-EP 4.5.2-1 Evaluation of Compliance** procedure.

5.0 Process

5.1 The **FF Team** will record any nonconformance identified during an audit on COFL-FF-ED 4.5.3-2 Corrective Action Request (CAR). The element within the ISO 14001 Standard associated with the nonconformance finding should also be recorded, if applicable.

5.2 The **FF Team** will keep a listing of Corrective Action Requests (CARs) issued during the audit and record them on **COFL-FF-ED 4.5.3-1 Corrective Action Request Log/Report**.

5.3 At the completion of an ESMS internal audit, the Internal Self-Audit Team will describe the nature of the nonconformance on a CAR form(s) and deliver the form(s) to the **FF Team** responsible for the department or area being audited. The **FF Team** will also forward a copy of the CAR forms to the **Management Representative**, along with the CAR Log and other relevant documentation.

5.4 The **Area Supervisors** responsible for the department or area being audited will complete sections C-E of the CAR forms by identifying the root cause of each issue, develop short- and long-term corrective and preventive actions, and propose target dates. The **Area Supervisors** will complete, sign and return the forms to the **Program Manager** within ten (10) business days.

5.5 Steps to be taken in the corrective action are to be documented on the CARs; supporting documentation can be attached.

5.6 Upon receipt of a response to a CAR, the **FF Team** will review the proposed corrective action and target dates for appropriateness. Verification will be documented and a copy of the form will be returned to the **Area Supervisors**. The original form will be maintained by the **ESMS Coordinator**.

5.7 The **COFL-FF-4.5.3-3 Preventive Action Proposal (PAP)** will be used to document observations, employee concerns, or employee suggestions to prevent future nonconformance from occurring. As with a CAR form, a PAP form will be issued to, and completed by, the **Area Supervisors** of the department or area where the preventive



- action is needed. The **Area Supervisors** will forward the PAP response to the **Program Manager**.
- 5.8 A completed PAP form will be reviewed by the **FF Team** to determine if the proposed preventive action and target dates are appropriate. Verification will be documented and a copy of the form will be returned to the **Area Supervisors**. The original form will be maintained by the **ESMS Coordinator**.
 - 5.9 The **FF Team** will ensure that nonconformances has been resolved (closed) and verification will be documented on the original CAR and PAP forms. The **ESMS Coordinator** will maintain documentation.
 - 5.10 In addition to Internal Self-Audits, the following will also be incorporated into the City of Fort Lauderdale ESMS Corrective and Preventive Action Program, as appropriate: Compliance Evaluations, second- and third-party (outside) audits, inspections by regulatory agencies and other authorities, and certain internal observations.
 - 5.11 Nonconformance findings and CARs from Internal Self-Audits, Compliance Evaluations, other audits, inspections, accidents, and other observations must receive timely corrective action. CARs requiring more than 60 days to complete must receive the approval of the **Senior Manager**.
 - 5.12 The **FF Team** is responsible for recording and distributing any changes to documented procedures resulting from corrective and preventive action. This will be done in accordance with **COFL-FF-EP 4.4.2-1 Competence, Training and Awareness Procedure** if additional training is needed.
 - 5.13 The **Program Manager** will regularly brief the **Management Representative** on progress toward resolution (closure) of corrective and preventive action. Refer to **COFL-FF-EP 4.5.5-1 Internal Audit Procedure** and **COFL-FF-EP 4.6-1 Management Review Procedure**.
 - 5.12 The **ESMS Coordinator** is responsible for recording and distributing any changes to documented procedures resulting from corrective and preventive action. This will be done in accordance with **COFL-FF-EP 4.4.2-1 Competence, Training and Awareness Procedure** if additional training is needed.

6.0 References / Related Documents

- 6.1 COFL-FF-EP 4.5.5-1 Internal Audit Procedure
- 6.2 COFL-FF-ED 4.5.3-2 Corrective Action Request (CAR)
- 6.3 COFL-FF-ED 4.5.3-4 Corrective Action Request Log/Report
- 6.4 COFL-FF-ED 4.5.3-3 Preventive Action Proposal (PAP)
- 6.5 COFL-FF-EP 4.4.2-1 Competence, Training and Awareness Procedure
- 6.6 COFL-FF-EP 4.6-1 Management Review Procedure
- 6.7 COFL-FF-EP 4.5.2-1 Evaluation of Compliance Procedure
- 6.8 COFL-FF-ED-4.5.3-5 Nonconformity, Corrective Action and Prevention Action Annual Review Maintenance

