

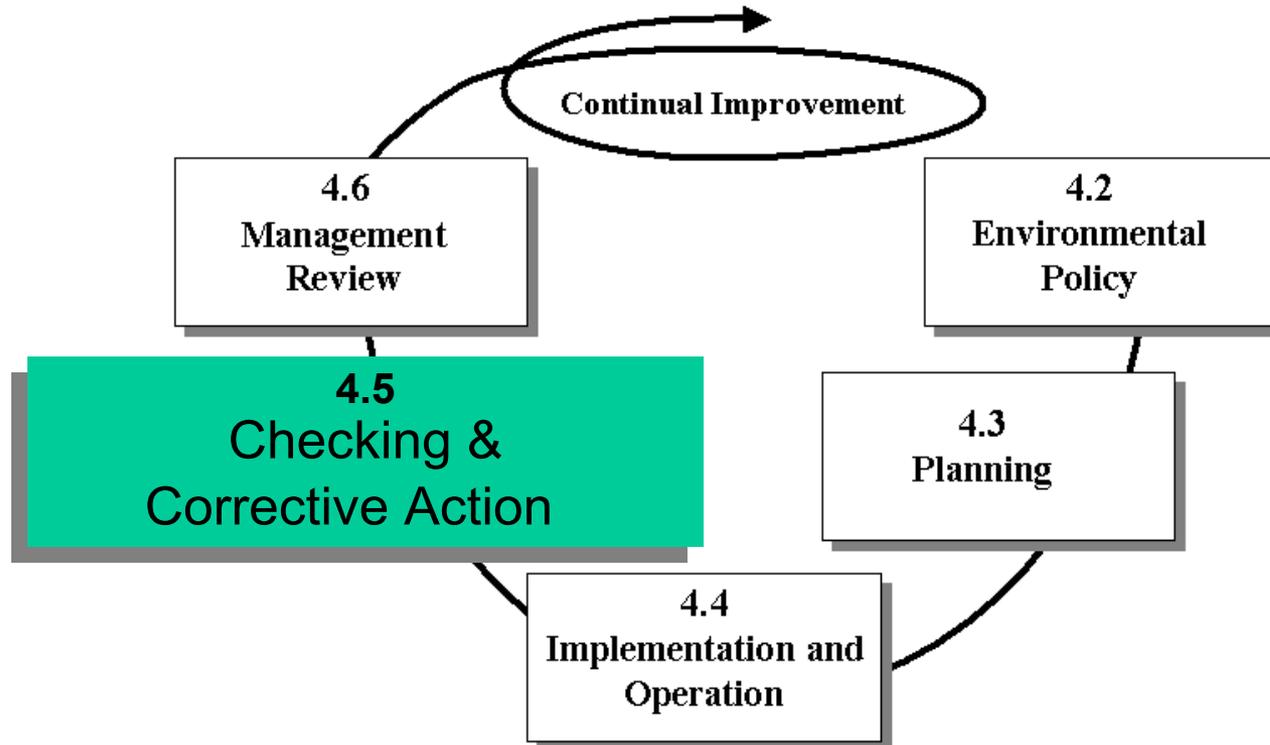


Module 9: Checking & Corrective Action

- What is required by ISO 14001?
- Why is it important?
- What are key issues for Army?



Checking & Corrective Action





Overview

4.5 Check & Corrective Action:

4.5.1 Monitoring & measurement

4.5.2 Nonconformance & corrective & preventive action

4.5.3 Records

4.5.4 Environmental management system audit



Requirements

Monitoring & measurement:

- “The organization shall establish and maintain documented **procedures** to monitor and measure, on a regular basis, the key characteristics of its operations and activities that can have a **significant impact** on the environment. This shall include the recording of information to track performance, relevant operational controls and conformance with the organization's environmental objectives and targets

Monitoring equipment shall be calibrated and maintained and records of this process shall be retained according to the organization's procedures.

The organization shall establish and maintain a documented procedure for **periodically evaluating compliance** with relevant environmental legislation and regulations.”

(ISO14001Sec. 4.5.1)



Key Concepts

■ Focus is on procedures:

- for tracking objectives & targets, & performance & controls
- for evaluating regulatory compliance
- for calibrating equipment & record keeping

■ Calibrating monitoring equipment

■ Fully leverage existing Environmental Compliance Assessment System (ECAS) program



Requirements

Nonconformance and corrective and preventive action:

- “The organization shall establish and maintain **procedures** for defining **responsibility and authority** for handling and investigating nonconformance, **taking action** to mitigate any impacts caused and for initiating and **completing** corrective and preventive action.

Any corrective or preventive action taken to eliminate the **causes** of actual or potential nonconformance shall be **appropriate** to the magnitude of problems and commensurate with the environmental impact encountered.

The organization shall implement and record any changes in the documented **procedures** resulting from corrective and preventive action.”(ISO14001Sec. 4.5.2)



Key Concepts

- **Focus is on conformance of the system**
- **Procedures for determining cause of nonconformance, mitigating damage, & eliminating the cause**
- **Actions should be appropriate to magnitude of impact(s)**
- **Resulting changes to existing procedures need to be recorded**



Requirements

Records:

- “The organization shall establish and maintain **procedures** for the identification, maintenance, and disposition of environmental records. These records shall include **training** records and the results of **audits and reviews**.

Environmental records shall be **legible, identifiable and traceable to the activity**, product or service involved.

Environmental records shall be stored and maintained in such a way that they are readily **retrievable and protected** against damage, deterioration or loss. The retention times shall be established and recorded.

Records shall be maintained, as appropriate to the system and to the organization, to **demonstrate conformance** to the requirements of this International Standard.” (ISO14001Sec. 4.5.3)



Key Concepts

- **Focus is on procedures for records management**
- **Needed to demonstrate conformance of system**
- **Must be traceable, retrievable, & protected**
- **Common US issue is incompatible computer programs and/or databases**



Requirements

Environmental management system audit:

- “The organization shall establish and maintain (a) **programme(s) and procedures** for periodic environmental management system audits to be carried out, in order to:
 - a) determine whether or not the environmental management system
 - 1) **conforms** to planned arrangements for environmental management, including the requirements of this International Standard; and
 - 2) has been properly implemented and maintained; and
 - b) provide information on the **results of audits to management.**

The organization’s audit programme, including any schedule, shall be based on the **environmental importance of the activity concerned** and the results of **previous audits**. In order to be **comprehensive**, the audit procedures shall cover the audit scope, frequency, and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results.” (ISO14001Sec. 4.5.4)



Key Concepts

- **Procedures focus on audit of system conformance**
- **Should reflect importance of activity**
- **Should be comprehensive**
- **Audit report provided to management**
- **Army ECAS includes EMS elements**



Summary

- Focus is on procedures
- Includes regulatory compliance & system conformance
- Mitigate & eliminate cause(s) of problems
- Action appropriate to magnitude of problem & environmental impact
- Key information source for mang't review
- Army has strong existing programs



Congratulations
You have completed Module 9.

