

I. PURPOSE:

To provide procedures for addressing corrective and preventive action as required by ISO 14001, paragraph 4.5.2 and OH&S 18001 section 4.5.2.

II. SCOPE:

The following describes the procedures for corrective and preventive action associated with the manufacturing operation.

1. The Corrective and Preventive Action procedure is to evaluate and respond to non-conformances which occur within the Environmental Management System (EMS) and Safety Management System (SMS).
2. Nonconformance: The following are examples of sources of non-conformances:
 - a. Emergency Preparedness and Response Report
 - b. Internal EMS auditing findings
 - c. Registrar EMS audit findings
 - d. Preventive Action Review
 - e. Monitoring and Measurement Records
 - f. Input from employees
 - g. Procedure Non-Conformance
 - h. Near Misses
 - i. Regulatory Non-Conformances

V. PROCEDURE:

1. Initiate serialized CPAR and investigates the nonconformance to determine immediate action to be taken to mitigate any impacts.
2. Initiate any records and reporting required by regulatory agencies.
3. Issue CPAR to manager responsible for the area in which the nonconformance was identified. May recommend corrective actions.
4. Determine root cause and lists the corrective action and note it on the CPAR.

NOTE: If corrective action is the same as the recommendation of EH&S corrective action need only be circled. If the department chooses another course of action, the corrective action must be noted.

5. Approve recommendation or works with manager to develop acceptable corrective action.

6. Implement Corrective Action.
7. Review CPAR for effectiveness and signs off and closes out CPAR when it is determined that the CPAR has been effective.

NOTE: In the event of a safety incident or near miss, the Risk Assessment for that area, operation, equipment, etc. should have an effectiveness review performed as part of the corrective action.

V. PROCEDURE: (Continued)

B. PREVENTIVE ACTION

NOTE: Preventive action takes three forms: 1) The preventive action review which is defined below; 2) the preventive action considerations that are inherently part of the ECA system, 3) preventive maintenance of equipment that may impact on the environmental or safety reference.

- Compliance Department
1. Semiannually, review the following records to identify trends and potential non-conformances:
 - a. CFI's data base
 - b. Monitoring and Measurement Records
 - c. Management System Audit Reports
 - d. Near Misses
 - e. Accidents & Incidents

NOTE: Should a nonconformance or potential nonconformance be identified as a result of the above review, a CPAR will be initiated and the procedures defined in Section A of the document will be carried out.