

## l'Anson Brothers Ltd Environmental Management System

# EMS SP08 Non-conformance, Corrective and Preventative Action

Version No: 1	Issued By: Operations Manager
Issue Date: 20th February 2022	

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## INTRODUCTION

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This procedure describes the steps that l'Anson Brothers Ltd takes to identify and correct actual non-conformities, as well as potential causes of non-conformity.

All procedures, documentation etc. referred to within this procedure are held on the Environmental Management System Folder on the computer system.

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## DEFINITIONS

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### Non-Conformity

A situation which does not comply with the requirements of one or more of the following:

- The Environmental Policy
- An EMS Procedure
- Relevant legislation (including the requirement of the Site PPC permit)

### Incident

An event which does not conform to normal operational circumstances or conditions.

### Complaint

Any expression of dissatisfaction by a customer, member of the public, or other third party whether justified or not.

### Corrective Action

Action taken in the short term to eliminate the cause of a non-conformity and prevent reoccurrence.

### Preventative Action

Action taken in the medium to long term to eliminate the cause of a non-conformity and prevent reoccurrence.

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## REFERENCES

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- Non-Conformance and Incident Report (NCIR)
- Environmental Communication (EMS SP05)
- Internal Audit Procedure (EMS SP09)
- Site Emergency Action Plan – held at each Site

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## RESPONSIBILITIES

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All staff are responsible for reporting non-conformities and incidents whether they arise through internal audits, internal or external communication or day to day activities.

The EMS team are responsible for reviewing the non-conformance information, implementing any changes to the Environmental Management System and checking the corrective action has been completed.

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## PROCEDURE

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Non-conformities and incidents may be identified and reported by any company employee, internal audit, contractor, regulatory authority or member of the public.

The appropriate information will be entered on the Non-Conformance and Incident Report Form and submitted to the Production Manager who will update and copy to the Operations Manager.

Where notification of abnormal emissions to the Environment Agency is required as per Section 5 of the Site PPC permit, the notification must be made by the Production Manager, or nominated deputy, using Schedule 1 of the Site Permit.

All incidences are reviewed at the EMS meetings and any changes required to the EMS system to prevent or limit recurrence are recorded.

The EMS Team also reviews incidence reports at the Management Review Meetings to identify:

- Areas where incidents/non-conformities occur most frequently.
- Any changes to the Environmental Management System which may be required to prevent or limit recurrence.

Preventative Action is based on the premise that the Environmental Management System is preventative in nature, by causing us to:

- Carry out significant environmental aspects evaluation.
- Carry out an evaluation of compliance with legal and other requirements.
- Carry out internal environmental audits.
- Appropriately maintain and calibrate monitoring & measuring equipment.
- Ensure that staff are adequately trained.

These steps help to prevent problems from occurring. However, the pro-active identification of potential non-conformities and implementation of preventative actions is part of the Management Review process.