

IGD 1014: ESOHMS INCIDENT, NONCONFORMITY, & CORRECTIVE ACTION

A. PURPOSE

The Interpretive Guidance Document (IGD) provides general guidance for the DLA-SM Environmental, Safety, and Occupational Health Management System (ESOHMS) per the integrated requirements of ISO 14001:2015 & ISO 45001:2018. This IGD establishes DLA Strategic Materials ESOHMS responsibility and authority for identifying, handling, and investigating non-conformances and potential non-conformances; mitigating resulting impacts; and initiating and completing corrective and preventive action, including results and effectiveness of corrective action. The DLA-SM ESOHMS applies to all DLA-SM facilities, their employees, and all personnel working on behalf of DLA-SM.

B. PROCESS

1. DLA-SM will determine opportunities for improvement of the ESOHMS, as determined through internal audits and results of management reviews, and implement necessary actions to achieve the intended ESOHMS outcomes.
2. Incident, nonconformity, and corrective action
DLA-SM will establish, implement, and maintain processes, including reporting, investigating, and taking action, to determine and manage incidents and nonconformities.

When an incident or nonconformity occurs, DLA-SM will:

- a. React in a timely manner to the incident or nonconformity, and as applicable, take action to control or correct it, and deal with the consequences, including mitigating adverse environmental impacts.
- b. Evaluate, with the participation of workers, and the involvement of other relevant interested parties, the need for corrective action to eliminate the root cause(s) of the incident or nonconformity, in order that it does not recur or occur elsewhere. This evaluation is to be performed by:
 - i. Investigating the incident or reviewing the nonconformity.
 - ii. Determining the cause(s) of the incident or nonconformity.
 - iii. Determining if similar incidents have occurred, if nonconformities exist, or if they could potentially occur.
- c. Review existing assessments of ESOH risks and aspects and other risks, as appropriately determined by ESOHMS.
- d. Determine and implement any action needed, including corrective action, in accordance with the hierarchy of ESOH controls and management of change.

- e. Assess ESOH risks and aspects that relate to new or changed hazards/impacts, prior to taking action.
 - f. Review the effectiveness of any action taken, including corrective action.
 - g. Make changes to the ESOHMS, if necessary.
- 3. Corrective actions will be appropriate to the effects, significance of the effects, or potential effects of the incidents or nonconformities encountered, including environmental impacts.
- 4. DLA-SM will retain documented information as evidence of the nature of the incidents or nonconformities and subsequent actions taken, and the results of any action and corrective action, including their effectiveness.
- 5. DLA-SM will communicate this documented information to relevant workers, and, where they exist, workers' representatives, and other relevant interested parties.
- 6. Continual improvement
DLA-SM will continually improve the suitability, adequacy, and effectiveness of the ESOHMS to:
 - a. Enhance ESOHMS performance.
 - b. Promote a culture that supports an ESOHMS.
 - c. Promote the participation of workers in implementing actions for the continual improvement of the ESOHMS.
 - d. Communicate the relevant results of continual improvement to workers, and, where they exist, workers' representatives.
 - e. Maintain and retain documented information as evidence of continual improvement.

C. SUPPORTING ESOHMS DOCUMENTS

- 1. DLA-SM ESOHMS Policy Statement
- 2. DLA-SM ESOH Management Plan

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