

## 1 PURPOSE AND SCOPE

- 1.1 Provides guidance on ASI's management of nonconformities (NCs) issued to CABs, including the raising of observations (OBs) and verification of CAB's corrective action plan and implemented corrective actions to demonstrate that the nonconformities have been successfully addressed.

## 2 TERMS AND DEFINITIONS

- 2.1 All terms and definitions are provided in the ASI Vocabulary.

## 3 ASSOCIATED DOCUMENTATION

3.1	Standards and Policies	ISO 17011:2004 ISO 19011:2002
3.2	Procedures, Guidelines	ASI-PRO-20-101-Accreditation v2.0 ASI-GUI-20-104-Surveillance v2.0
3.3	Checklists, Templates, etc.	ASI CAR Template

## 4 GENERAL GUIDANCE

- 4.1 During all ASI assessments, objective evidence shall be evaluated against the assessment criteria to generate the assessment findings, which may indicate either conformity or nonconformity with the assessment criteria.
- 4.2 NCs and their supporting assessment evidence shall be recorded and graded as minor or major. They shall be presented to the CAB under assessment during the assessment's closing meeting to obtain acknowledgement that the assessment evidence is accurate, and that the NCs are understood. Every attempt should be made to resolve any diverging opinions concerning the assessment evidence and/or findings, and unresolved points shall be recorded.

## 5 DETECTION OF NCS

- 5.1 A NC may be identified by ASI at any time through assessments, review of documentation, or through documented evidence obtained through stakeholder's notification, or complaint. Any evidence received by ASI shall be evaluated by an ASI APM or lead assessor before it can be classified as a nonconformity.
- 5.2 A NC may be caused by the non-fulfilment of specified accreditation requirements, the absence or total breakdown of a quality system element, or lapse in the content or implementation of CAB procedures or records.

## 6 RECORDING AND GRADING OF NCS

- 6.1 NCs (with either a CAB's own procedure or with an accreditation requirement) detected and raised by ASI lead assessors shall be based on documented evidence.
- 6.2 For each NC identified, the following information shall be recorded:
  - 6.1.1 A clear description of the NC;
  - 6.1.2 The objective evidence that lead to its identification;
  - 6.1.3 The section and clause of the standard or procedure that the NC is being raised against;
  - 6.1.4 The grading of the NC;
  - 6.1.5 The timelines for the CAB to implement corrective action and demonstrate conformity.
- 6.3 The NC or any associated corrective action request should not include any instructive or consultative elements.

**Note:** Any NC identified shall be recorded in ASI assessment report even if a CAB is correcting the nonconformity before the end of an assessment.

- 6.4 According to its severity, all identified NCs shall be graded as major or minor in line with the definitions in the ASI Vocabulary, reproduced below:

### **Major NC (Category 1)**

A systematic failure or significant deficiency - either as a single incident or a combination of a number of similar incidents - in part of the quality system, or the lack of implementation of such a part, governed by applicable standards. A number of NCs identified against one requirement of the relevant standards can represent a total breakdown of the system and thus be considered a major NC.

### **Minor NC (Category 2)**

An isolated or sporadic lapse in the content or implementation of procedures or records which could reasonably lead to a systematic failure or significant deficiency of the system if not corrected. If a pattern of minor NCs occurs over successive assessments, it may represent a systematic failure or significant deficiency of the system and a major NC shall be issued.

- 6.5 NCs and related timelines to demonstrate conformity become effective when the relevant ASI assessment report has been finalized.

- 6.6 In situations where a problem might occur if action is not taken but the finding cannot be classified as a NC, then it may be recorded as an observation. Observations should be presented in the assessment report so that the CAB may undertake preventive action.

**Observation (Category 3)**

An area of concern, a process, document or activity that is currently conforming but may, if not improved, result in a nonconforming system, product or service.

- 6.7 The observation should describe the situation that requires attention by the CAB. Any associated recommendation should not include any instructive or consultative elements.
- 6.8 If a total breakdown of the system is detected that constitutes a risk for the credibility of ASI and/ or the certification scheme as defined in the Accreditation Agreement, ASI reserves the right to launch immediate disciplinary measure following the terms of the Accreditation Agreement and without first raising a major NC.
- 6.9 If at least 5 major NCs are detected within one assessment, the ASI lead assessor shall recommend immediate suspension of accreditation in the Assessment Report.

**7 TIMELINES FOR IMPLEMENTATION OF CORRECTIVE ACTION(S) BY CAB**

- 7.1 Timelines for CABs to implement appropriate corrective action(s) and demonstrate conformity are:
- 7.1.1 Minor NCs shall be addressed in full and conformity demonstrated within 12 months of the finalization of the ASI Assessment Report.
  - 7.1.2 Major NCs identified in an initial assessment, or during an evaluation process for extension of accreditation scope, preclude accreditation being recommended or the scope from being extended.
  - 7.1.3 Major NCs identified during surveillance or re-accreditation assessments shall be addressed in full and conformity demonstrated within 3 months of the finalization of the ASI Assessment Report. In cases where the ASI lead assessor believes that the NC identified creates a risk to the integrity of the accreditation, the lead assessor may propose a shorter time period for the CAB to implement corrective action(s) and demonstrate conformity.
  - 7.1.4 The ASI lead assessor may require the CAB to immediately address the identified nonconforming products or services when major NCs are identified during surveillance or re-accreditation assessments.
  - 7.1.5 Extensions of timelines beyond 12 months for minor NCs and 3 months for major NCs can only be granted by the ASI Director.

- 7.2 A CAB may only appeal an NC raised by ASI within the first 30 days of its effective date, when the relevant ASI assessment report has been finalized.

## **8 VERIFICATION OF EFFECTIVE CORRECTIVE ACTION AND CLOSING NCS**

- 8.1 The dates by which NCs must be fully addressed shall be recorded by the relevant APM or lead assessor.
- 8.2 The CAB is required to implement corrective action (including determining the root cause of the NC, and identifying and addressing any other resultant NC) within the specified timeline. The CAB is also required to verify the effectiveness of that corrective action prior to providing ASI with evidence to demonstrate conformity.
- 8.3 ASI shall verify that the corrective action was adequate to address the NC identified and to demonstrate conformity. The appropriate verification method by the ASI lead assessor or APM depends on the severity and the nature of the NC and may range from a desktop review of documentation to an on site assessment.
- 8.4 NCs can only be closed out if the CAB can demonstrate conformity with the accreditation requirement through the implementation of appropriate corrective actions. Partial implementation of corrective actions resulting in partial conformity shall not be acceptable evidence for closing a NC.
- 8.5 Upon closure of a NC, the relevant ASI Assessment Report(s) and Nonconformity Form(s) shall be updated to indicate the new status.

## **9 CONSEQUENCES OF CONTINUING NONCONFORMITY BY A CAB**

- 9.1 If an accredited CAB does not implement satisfactory corrective action to correct a major NC and demonstrate conformity within the required time, the ASI Director, in consultation with the ASI lead assessor, may start suspension procedures.
- 9.2 If an applicant CAB does not undertake corrective action to address a major NC so that it can demonstrate conformity, then the ASI assessment report shall not be forwarded to the Accreditation Committee for decision on accreditation until conformity has been demonstrated.
- 9.3 If an accredited CAB does not perform satisfactory corrective action for a minor NC within the required time, the NC will be upgraded to a major NC. Extensions of timelines can only be granted by the ASI Director.
- 9.4 Observations are related to an area of concern, a process, document, or activity that is currently conforming but may, if not improved, result in a nonconforming system, product or service. Thus, observations which are not addressed by the CAB may lead to a NC being identified in the future.

## **10 CODING OF NCS AND OBSERVATIONS**

- 10.1 NCs and observations shall be uniquely coded to provide for identification and future reference. The identification code of NCs may be comprised of 6 or 7 fields, each separated by period (".") as shown in Table 1.

**Table 1: Coding of NCs**

Field 1	Field 2	Field 3	Field 4	Field 5	Field 6	Field 7
NC	CB	FSC	COC	GER	2009	01
Qualifier for type of nonconformity. "NC" for major or minor nonconformity; "OBS" for observations.	Registered abbreviation of the certification body	Certification scheme.	Type of assessment (see table 2 below)	3 letter country code if needed	The year of the assessment in which the nonconformity was detected	Consecutive number of CAR; numbering starts from 1 for each audit type at the beginning of a calendar year

**Table 2: Coding of assessment types**

Code	Covers
OFF	CAB's office assessment
FM / FI	Witness of CAB's assessment of forest or fisheries management client
COC	Witness of CAB's assessment of chain of custody client
DOC	Document review

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