

WORKING MATERIAL 3.10 · CHAPTER 3 — THE INTERNAL AUDITOR'S LENS

Nonconformity Grading: What a Grade Is Actually a Statement About

Source: Francesco Dore, *The Helm and the Lens*, Volume 1b — ISO 14001:2026, subchapter 3.10

GUIDING QUESTION

You graded it major because the substance was hazardous. Was the system broken, or did it slip once?

1 · Verification Pact

Copied from the book. The third column is for your property: what holds here, and how you know.

Market claim	What actually holds	In our property
"ISO 14001 defines major and minor nonconformities."	It does not. It defines nonconformity as non-fulfilment of a requirement and grades nothing.	
"Internal audits must classify findings as major, minor or observation."	No classification is required; the scheme, if any, is the organisation's own.	
"A minor nonconformity does not require root cause analysis."	The requirement to evaluate the need for action to eliminate causes attaches to nonconformities without regard to any grade the organisation has assigned.	
"Observations do not need to be recorded."	The standard has no observation category at all; whatever a property calls it, if it is a non-fulfilment of a requirement it is a nonconformity.	
"Grading reflects the environmental risk of the activity concerned."	The standard ties corrective action to the significance of the effects; it does not make hazard the basis of any classification, because it establishes no classification.	

2 · Common mistakes — a self-check

Tick each mistake you recognise in your own property. The consequence is the book's.

- ☐ **Grading by the hazard of the material involved** — Working controls escalated; absent processes tolerated.
- ☐ **Grading by whether harm actually occurred** — The system is judged by its luck rather than by its state.
- ☐ **Using observation for findings that would be awkward as nonconformities** — The category becomes the place where inconvenient findings are stored.
- ☐ **Treating each recurrence as a fresh minor** — A control that has never worked is recorded as a series of small lapses.
- ☐ **Assuming a minor grade removes the obligation to look for causes** — The requirement attaches to the nonconformity, not to the grade.

- ☐ **Operating a grading scheme that exists only in the auditors' heads** — Different criteria per auditor and per year, and no comparability across cycles.
- ☐ **Importing certification-body grading language without adopting its definitions** — Words used with authority that nobody in the property can define.

3 · What an auditor would ask to see

Questions drawn from the subchapter's reading of the standard and its practical application. They are questions to test your own evidence, not additional requirements.

Question	Where the evidence lives	Seen?
If the property grades findings, where are its grading criteria written down?	Audit procedure or programme	
For each nonconformity, including those graded minor, is there evidence that the need for action on causes was evaluated?	Corrective action records	
Was it determined whether similar nonconformities exist or could occur elsewhere?	Corrective action records	
Are findings that recur across years identified, and is recurrence taken into account?	Finding log over several years	
Does the evidence show reaction, correction and review of effectiveness for each nonconformity?	Corrective action records	

4 · From the Operative Synthesis to action

Concrete actions taken from the subchapter's Operative Synthesis. Fill in the owner and the date in your property.

Action	Owner	Due date
1. Grade each open finding by two questions: does the required process exist and operate, and has this happened before?		
2. Carry hazard and consequence into the response — urgency, proportionality, what the correction must achieve — not into the grade.		
3. Review past grades for functioning controls treated as emergencies and missing processes treated as ideas.		

What this sheet is not: ISO 14001 does not prescribe this form. It is a working aid drawn from the book; the standard and, in Chapter 4, the certification body's own rules and contract govern the real case.