

WORKING MATERIAL 4.10 · CHAPTER 4 — THE CERTIFIER'S LENS

When a Nonconformity Threatens the Certificate

Source: Francesco Dore, *The Helm and the Lens*, Volume 1b — ISO 14001:2026, subchapter 4.10

GUIDING QUESTION

You have a major nonconformity and a short deadline. The fastest response available to you is also the only one that cannot close it. Why?

1 · Verification Pact

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

What is claimed	What actually holds	In our property
"A major is a big minor."	A major describes a failure of the system's capability to achieve an intended outcome, not a larger quantity of error. A single instance can be major; a long-running gap the system itself detected may not be.	
"ISO 14001 defines major and minor nonconformities."	It defines nonconformity as non-fulfilment of a requirement and grades nothing. Major, minor and observation belong to the certification framework, not to the standard.	
"We fixed it, so it is closed."	That is the correction. The requirement is to evaluate the need to eliminate the causes so it does not recur or occur elsewhere, implement action, review its effectiveness, and change the system if necessary.	
"We should challenge the grading."	The team recommends and the body decides, and the clock runs meanwhile. Factual errors in the finding should be raised at once with evidence; disagreement with a correctly stated finding costs time that only the response can use.	
"The obligation is in our register, so we are managing it."	Determining obligations and evaluating compliance are two separate requirements. The second has its own frequency, its own action when compliance is not met, and its own documented evidence of results.	
"We can produce the evidence of effectiveness inside the deadline."	Usually you cannot, and you are not required to. What has to exist by the deadline is the action and a defined means of verifying it; the body decides whether that is confirmed by a further audit or at a future surveillance.	
"Suspension is a matter between us and the certification body."	Commercial agreements frequently require notification if certification is suspended, withdrawn or reduced in scope. The consequences of a major live in contracts the hotel signed, not only in the audit file.	

2 · Common mistakes — a self-check

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

- ☐ **Sending the correction and calling it closure** — It is the commonest single error in the whole certification relationship and it costs the fortnight it was meant to save.
- ☐ **Spending the first days arguing the grade** — The grade is not the variable; the response is.
- ☐ **Treating a compliance finding as a records problem** — If the compliance evaluation declared conformity without evidence, the records are the symptom.
- ☐ **Trying to demonstrate effectiveness inside the deadline** — Effectiveness cannot be shown in a fortnight; how and when it will be demonstrated is left undefined.
- ☐ **Choosing an action that fits the deadline rather than the cause** — The window selects the weak rungs and a major requires the strong ones.
- ☐ **Inventing a systemic cause where the cause is an individual** — The resulting process is then maintained forever.
- ☐ **Discovering only under pressure which commercial contracts depend on the certificate** — The contracts that have to be told are unknown on the day they matter.

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?
For each major nonconformity, are correction, cause, action and verification each recorded?	Corrective action records	
On which rung does the action sit, and does it reach the level at which the cause sits?	Corrective action records	
How and when will effectiveness be verified?	Corrective action plan; correspondence with the certification body	
Why did the compliance evaluation not detect the condition — did it check evidence or only the register?	Compliance evaluation records	
Which other obligations depend on contracts in the same way?	Obligations register; contracts	
Which client contracts require notification if certification is suspended, withdrawn or reduced?	List of contracts	

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. Know the four parts of the response — correction, cause, action, verification — before a major is ever raised.		
2. Choose an action on the rung where the cause sits, not the rung the calendar makes comfortable.		
3. Ask the detection question as well as the occurrence question.		

Action	Owner	Due date
4. Define how and when effectiveness will be shown rather than trying to show it within the deadline.		
5. On an ordinary day, list which of the hotel's contracts would have to be told.		

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.