

FIAS Standard Review: summary of changes proposed to FIAS 2021

Section/clause in FIAS 2021	Detail	Reason
Whole Standard	Change “shall” to “must”	Better terminology
	Check and update links to legislation, document references and external information	Ensure correct information and ease of use for Participants
	Renumbering of clauses as appropriate	
General		
G1.3	Repeat the [R] and [T] information for records and templates	Relevant position in document for Participants reading clause (currently after contents list)
G3.1	Reworded Management review requirement and changed “annual” to every 12 months	Clarification for Participants – clause has had high level of NCs
G4.1	Wording amended to improve flow	Avoid repetition of “must”
G6.1	Added template [T]. Electronic record acceptance added to guidance	Clarification – common NC cause
G6.2 NEW	Expansion of competence to review and record annually, identify training needs, check understanding of FIAS purpose and relevant in-house procedures. Added [R] Guidance gives examples	To clarify competence from G6.1 and expand to guide Participants on compliance. Ensure that training is current.
G6.3	Current i-learning or equivalent package specified	
G7.1	Added record [R]	
G10.1	Guidance text removed “Ideally the assessment leader should have attended a recognised training course.”	Repeated guidance above – not felt to add useful information as courses not detailed
G11.1	“Annual” clarified to “every 12 months”	Clarification and consistency with previous clauses
G14.1	“or format“ removed	Agreed that packaging format was already covered within clause
G16	Added “only” to definition of contractor in this section	Clarification
G17.1	Guidance wording amended [R] added	Clarification
G18.1	Internal audits - wording amended	Clarification – common non-compliance area
G18.2	Internal audits - wording amended	Clarification – common non-compliance area
G19.3	Addition to guidance re protecting electronic records	
G21	Product recall clause and guidance revised and contracted from 6 subclauses to 3	Repetition removed and text streamlined
G22.1	Complaints clause reworded	Wording improved
G22.2	Clause changed to guidance	
G23.1	Updated references and links in guidance	
G24.1	Guidance re INCO terms removed	Deemed unnecessary
G25.1	Changed “audit trail” to “traceability”	Clarification

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	Addition to guidance re where DRT is held. Guidance links to legislation information and definition in Appdx 3 expanded and updated.	
MP5.2	Wording amended to “display” logo	Infers visibility, NaCTSO recommendation
S1	Clause removed. Wording retained as description of “storage”. Reference to Fluid Fertiliser Guidance added. Subsequent clauses renumbered Links updated	Clause was descriptive and not auditable – sets scene for clauses below
S2.1 NEW (2021-S3)	Clause added to require a Fire Risk Assessment to be in place and record. Guidance links added	Added to clarify section on fire precautions
S2.3 (2021-S3.3)	Fire detection clause reworded and guidance added re frequency of maintenance and service	Clarification of wording
S3.6 (2021-S4.6)	Addition of liquid material storage and N level on bulk materials	Clarification and inclusion of liquid fertilisers
S5.4 NEW (2021-S6.3)	Requirement for DGSA current annual report moved into separate clause	Common non-compliance – clarification that both cert and report are required
S5.5 (2021-S6.4)	“legible” added to printed name requirement	Common non-compliance; important for security traceability; consistent with transport clauses
S6.3 (2021-S7.3)	“legible” added to printed name requirement	
S6.5 (2021-S7.5)	Wording revised	Clarity
M1.1	Reference to CEPPR added to guidance	Legislation information- agreed not necessary to repeat requirements in clauses. Additional Appendix specific to CEPPR
M1.8 NEW	Additional requirement re supply chain information + guidance to Appendix 7. Updated post-consultation and additional link to Gov.UK guidance	Main area of non-compliance for FIAS in relation to CEPPR. Regulated & reportable are defined in Appendix.
M3	Update to BASIS details in guidance and link to new definition in Appendix 3 re FACTS	Additional information on FACTS and contact details
M4.3 NEW	Addition of requirement for DGSA for consignors and therefore certificate. Post consultation – added “consignor” ADR definition to Appendix 3 + link	Wording consistent with Storage and Transport sections. To further clarify when DGSA appointment is required.
M4.4 NEW	Addition of requirement for DGSA current annual report Subsequent sub clauses renumbered	
T6.3 NEW	Requirement for DGSA current annual report moved into separate clause	Common non-compliance – clarification that both cert and report are required

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T7.1	Guidance reworded to list safety equipment as current FIAS audit checklist	More relevant guidance
T7.2	Amended wording	Clarification
T7.3	Amended wording	Clarification
T8.1	Guidance to include link to definition of “in transit” added to Storage in Appendix 3	Clarification
T9.3	“legible” added to printed name requirement	Common non-compliance; important for security traceability; consistent with storage clauses
Appendices		
1 Legislation	Disclaimers updated Link and titles checked and updated	Items removed if no longer available
2 Guidance	Disclaimers updated. Link and titles checked and updated	Items removed if no longer available
3 Definitions	<i>Agent</i> - definition updated <i>Bulk</i> – definition added <i>DRT</i> – definition expanded <i>Explosives Precursors</i> definition to be added based on gov.uk guidance pages <i>FACTS</i> – definition added <i>Manufacturer</i> – “shall be” to “is” <i>Off-spec</i> – date change to 2015 – wording updated <i>Placing on the market</i> – wording shortened <i>Product</i> – extended to include “solid or liquid” <i>Relevant Ammonium Nitrate</i> – regulations and wording quoted confirmed <i>Storage</i> – addition of in-transit to definition Post consultation: <i>Consignor</i> – as per ADR in relation to requirement for DGSA	Simply and clarify; ensure correct and current
4 Record List	Records – updated following review and clause numbers confirmed	
5 Contact details	Updated details and weblinks	Added: NCSC, Port Skills and Safety, Protect UK, Homeland Security/Chemical Reporting Team
6 Product development	Removed	Not relevant or used
7 NAMOS Guidance	No change except to Appendix number	Appendix 6
8 CEPPR Guidance	Include in main document with updated Appendix number	Appendix 7