

FIAS Standard Review: summary of changes from FIAS 2021 to FIAS 2026

Section/clause in FIAS 2026	Detail of change	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	
Clause		
G1.3	Repeat the [R] and [T] information for records and templates – additional position in document	Relevant position in document for Participants reading clauses (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] for record. Guidance gives examples	To clarify competence from G6.1 and expand to guide Participants on compliance. Ensure that training is current.
G6.3	“Most up to date” added to i-learning or equivalent training package	Clarification to ensure training is always the most recent information
G7.1	Added record [R]	Documentary evidence required for compliance
G10.1	Guidance text removed “Ideally the assessment leader should have attended a recognised training course.”	Removes repetition and course details not given – for Participant to decide additional training
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 and guidance added on using an audit schedule	Clarification – common non-compliance area
G19.3	Addition to guidance re protecting electronic records	Reflects use of digital records and data
G21	Product recall clause and guidance revised and reduced from 6 subclauses to 3	Repetition removed and text streamlined
G22	Complaints clause reworded and reduced to 2 subclauses from 3. Clause G22.2-2021 moved to guidance	Wording improved and streamlined
G23.1	Updated references and links in guidance	
G24.1	Guidance re INCO terms updated	Additional weblink added
G25.1	Changed “audit trail” to “traceability” Addition to guidance re where DRT is held.	Clarification in relation to current legislation

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	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 from “The Company must have a process which ensures...” to “ The Company must ensure”	Less wordy
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. Further link to Gov.UK guidance added	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 the DGSA certificate. “consignor” ADR definition added to Appendix 3 and web link	Wording consistent with Storage and Transport sections. Reflects current legislation. Further clarification of 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 in last paragraph to make actions required clearer	Clarification
T7.3	Amended wording “Dangerous Goods” added to clarify where additional actions may be required	Clarification
T8.1	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>Off-spec</i> – date change to 2015 – wording updated <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 flowchart	Not relevant or used
7 NAMOS Guidance	No change except to Appendix number	Appendix 6
8 CEPFR Guidance	Include in main document with updated Appendix number	Appendix 7