

**From:** Phil Chambers at Strategic Safety Systems Ltd. [phil@strategicsafety.co.uk]  
**Sent:** 29 November 2012 10:00  
**To:** phil@strategicsafety.co.uk  
**Subject:** News and Legal Updates from Strategic Safety Systems Ltd.!

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November 2012

Strategic Safety Systems Ltd. Newsletter

Dear Philip,

Welcome to the November edition of our newsletter. What we aim to do is to provide information which is of use to you and to let you know the activities in which we have been involved. We also aim to let you know of any incidents that have occurred in, and legislation that is related to, the areas in which we work. We realise that, with the broad spectrum of our activities, some may not be relevant to you but we hope you find the rest useful. Whilst the intention of this newsletter is to be useful, we realise that most people are plagued by spam and should you wish to prevent future issues being sent to you, unsubscribe using the link at the bottom of the page.

Regards,

Philip Chambers  
Strategic Safety Systems Ltd.

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Plan ahead for refrigerant change

We have said this before, but you need to plan ahead for the change away from HCFC refrigerants in air conditioning and chiller systems. You have 2 years before their use becomes prohibited and if you leave it until late 2014, then you will probably find that people to do this are already committed and costs will escalate. I suspect that the Environment Agency will issue a prohibition notice if they find HCFCs in use after 1st January 2015, so that would mean key equipment, eg a press being out of action because you cannot run the chillers.

What you need to do now is:

1. Determine if you are using HCFCs **NOW**. On the SSS website, there is [guidance](#) on what are and what are not HCFCs. Look at the plate on the equipment, read the gas type, eg R22 and look it up in this guidance.
2. Ask your air conditioning/chiller company for their recommendations. It may be a simple change of gas, but some may recommend complete equipment replacement. In some cases, the replacement gas, although compatible with seals in the equipment, is not as effective as a refrigerant.
3. Plan and budget for when you will make the change

Business continuity function added to INTACT

We've added a [business continuity module](#) to the INTACT integrated action management system. This provides an output report showing the events/impact analysis in descending order of risk, with controls should the event occur, contact details, actions to ensure that the plan works and the status of the plan, eg Has it been tested?

In addition to this being essential to plan for events such as key suppliers being flooded out or key people being ill, clients are increasingly expecting a business continuity plan as part of the tendering process.

This now brings the available modules in INTACT to:

- Quality assurance
- Health and Safety
- Environment
- Training
- Information Security
- Planned maintenance and calibration
- Business continuity

And don't forget, [business continuity support](#) is one of the services provided by SSS.

FSC good news and FSC bad news

**Good news:**

The FSC have revised their directive FSC-DIR-40-004. This now clarifies situations where companies have experience different auditors have different opinions. For example, this directive now makes it clear that inserts in magazines are not a necessary part of the magazine, whereas the cover and text pages are. Therefore the need for inserts to be FSC certified in an FSC certified magazine is discretionary.

**Bad news:**

FSC are proposing an On-Line Claims Platform. My reading of the [information on this](#) gives me the feeling that this will be quite cumbersome. It promises lots of benefits but, call me a pessimist, so have a lot of other ambitious IT systems.

## *Legal compliance audits - now an increasing requirement*

For many years, SSS have provided legal compliance audits to support companies whom we have helped with certification to ISO 14001 or OHSAS 18001. However, we are being increasingly asked to do this as a stand-alone requirement, both with companies going for certification and with companies who are not.

In addition to 14001/18001 a robust legal compliance audit, which is not as onerous as it sounds, is far better than healthchecks which have limitations and can generate a false belief in compliance.

See [more about the legal compliance service](#).

I hope you have found this information of interest. If you have any suggestions of other information you would like to see, please [contact me](#).

Regards,

Philip Chambers  
Strategic Safety Systems Ltd.

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