



Northern Ireland Environment Agency  
Gníomhaireacht Comhshaoil Thuaisceart Éireann  
Northern Ireland Environment Agency

# IPRI Chemical Compliance Report



Timber treatment Industry – Chemicals Inspections



An Agency within the Department of  
**Agriculture, Environment  
and Rural Affairs**  
www.daera-ni.gov.uk

Gníomhaireacht de chuid na Roinne  
**Talmhaíochta, Comhshaoil  
agus Gnóthaí Tuaithe**

An Agency w'in the Department o  
**Fairmin, Environment  
an' Kintra Matters**

## Chemical Compliance Report

### 1. Timber Treatment Industry – Part A sites<sup>1</sup>

The Chemical Compliance Team, part of the Industrial Pollution and Radiochemical Inspectorate within the Northern Ireland Environment Agency (an Executive Agency of DAERA), has responsibility for enforcing the following regulatory regimes, which are subject to the Windsor Framework:

- REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals), where the [EU REACH](#) Regulation EC1907/2006 is enforced in NI through The [REACH Enforcement Regulations 2008](#)<sup>2</sup>;
- POPs (persistent organic pollutants) - the UK is party to the UN [Stockholm Convention on Persistent Organic Pollutants \(POPs\)](#). The UK's National Implementation Plan sets out how all 4 regions of the UK plan to meet our obligations under the Convention. The [EU Regulation on Persistent Organic Pollutants](#) EU 2019/1021 is enforced in NI through [The Persistent Organic Pollutants Regulations 2007](#).;
- Mercury - the UK is party to the UN [Minamata Convention on Mercury](#), and the [EU Mercury Regulation 2017/852](#) and [EU Mercury Regulation 2024/1849](#) are both enforced in NI through [The Control of Mercury \(Enforcement\) Regulations 2017](#).

Between February and July 2025, chemicals inspections were undertaken on Part A installations<sup>1</sup> within the timber treatment industry, with 8 installations being examined. 4 sites were visited and inspected in partnership with the PPC inspector.

### 2. Summary of the inspections

- Inventories received
- Type of issues encountered with sites
- Lessons learned

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<sup>1</sup> Part A installations are those installations for which a part A permit is required under The Pollution Prevention and Control (Industrial Emissions) Regulations (NI) 2013 (the PPC IE Regulations) for the carrying out of activities listed in Schedule 1 to the PPC IE Regulations.

<sup>2</sup> The REACH Regulations are enforced jointly by the Health and Safety Executive for Northern Ireland (HSENI), NIEA (an Executive Agency of DAERA, and the local councils. The functions of the enforcing authorities are laid out in Schedule 2 to the REACH Enforcement Regulations 2008. The functions of DAERA (undertaken by NIEA) are to (a) prevent, minimise, remedy or mitigate the effects of pollution on the environment and (b) to ensure the safety of the environment.

## 3. Inventories received

Eight chemical inventories were received in various formats, with a range of 3 to 106 chemicals reported across each of the sites.

None of the sites inspected reported the use or storage of any Persistent Organic Pollutants or mercury-containing chemicals.

*Table 1 Overview of the number of REACH authorisations, restrictions or candidate substances within timber sector*

REACH Authorisation	REACH Restriction	REACH Candidate List
0	9	1

*Table 2 Overview of the type of REACH restrictions within timber sector*

Chemical	Entry number on Annex XVII to REACH	Condition checked
Isocyanates	56	Packaging labelling requirements for allergies and ventilation
	74	Requirement for training and records
Caustic soda	3	Areas of non-usage
	75	Restriction on use – do not use in tattooing applications
DEGME (2-(2-butoxyethoxy)ethanol)	55	Restriction on use – do not use in paint spraying equipment

## 4. What we found

- There were no breaches of the regulations that required enforcement action to be taken under the DAERA Enforcement and Prosecution Policy.
- Across all the inspections undertaken, the most frequently observed non-conformance related to Safety Data Sheets (SDSs), with a high proportion found to be non-compliant with EU REACH regulatory requirements. In total, eight minor non-conformances were raised. Five sites were noted to be using UK REACH safety data sheets.

- One safety data sheet supplied was missing sections due to formatting, that had not been picked up by the operator.
- There was a discrepancy noted where a supplier had provided the same version of an SDS to two different companies, but with different revision dates. This matter was referred to HSENI, as lead authority for this function in NI.
- At two sites, operators misunderstood the requirement to submit information for the entire chemical inventory. They only provided details for those substances covered under the PPC Permit, however, the chemicals legislation referred to Section 1 applies to all aspects of the business.

### 5. What we did:

In order to secure compliance with the regulations, the following actions were carried out-

- Operators were advised of their EU regulatory obligations and advised to contact their suppliers to ensure compliant Safety Data Sheets were obtained.
- Spillage kits to be restocked and photographic evidence to be supplied.
- Recommendation of disposal of expired and unused restricted material under legal waste management options.

### 6. How did we improve our service delivery?

We improved our service delivery by-

- We rephrased the letter issued to the installations to reflect the entire site, to provide clarity.
- We developed a standardised template spreadsheet which will be issued to operators in future to promote uniformity and provide clear guidance on the information that must be submitted.

### 7. What we will do next

The next phase of regulating the timber treatment sector will be to examine sites that are not undertaking an activity prescribed under the PPC IE Regulations.

Follow up inspections will be undertaken to those sites inspected in due course.

The programme of inspections will continue for Part A Installations, on a sector-by-sector basis. These have already commenced, focusing on Part A sites in the energy industry and Part A industries using dyes and inks.



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