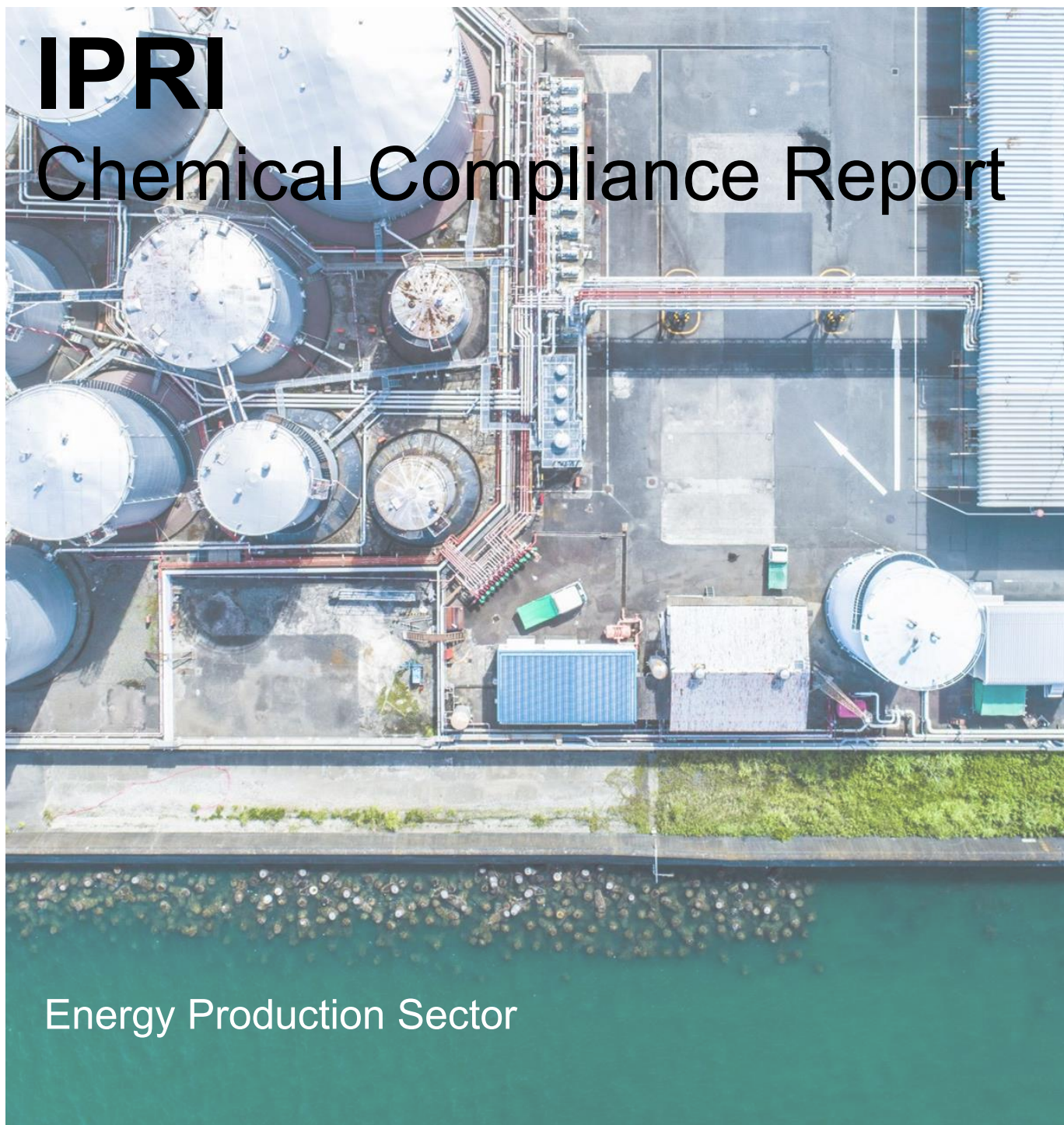




Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Northern Ireland Environment Agency

IPRI Chemical Compliance Report



Energy Production Sector



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. Energy Industry – Part A sites¹

The Chemical Compliance Team, part of the Industrial Pollution and Radiochemical Inspectorate (IPRI) 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](#)²;
- 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 June 2025 and February 2026, chemicals inspections were undertaken on Part A installations¹ within the energy industry, with 9 installations being examined. 2 sites belonging to the same company were combined into one assessment. 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

¹ 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.

² 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

8 chemical inventories were received in varying templates, with a range of 1 to 1148 chemicals reported across the sites.

Three operators, across four sites, reported storing Perfluorooctanoic acid (PFOA), a Persistent Organic Pollutant present in Class B firefighting foam.

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

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

REACH Authorisation	REACH Restriction	REACH Candidate List
3	12	3

Table 2 Overview of the type of REACH authorisations within energy sector

Chemical	Authorisation number under Annex XIV to REACH	Condition checked
Potassium dichromate (in water analysis chemical kits)	Authorisation 19	Article 57(a), (b) and (c) Carcinogenic, Mutagenic and Toxic for reproduction. Under Article 3(23) of REACH, scientific research and development means any scientific experimentation, analysis or chemical research carried out under controlled conditions in a volume less than one tonne per year. Thus, the use of an Annex XIV substance in analysis is exempted from authorisation under Article 56(3) if the substance is used, on its own or in a

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		<p>mixture, in analytical activities such as monitoring and quality control where these activities are carried out under controlled conditions and in a volume not exceeding one tonne per year and per legal entity.</p>
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Table 3 Overview of the type of REACH restrictions within the energy sector

Chemical	Entry number on Annex XVII to REACH	Condition checked
<p>Respondol ATF Caustic soda PR148 adhesion promoter</p>	3	<p>Not to be used in ornamental lamps or ashtrays, tricks or jokes, or games.</p>
<p>Mercury sulphate (in water analysis chemical kits)</p>	18	<p>Not to be used for (a) prevention of fouling by micro-organisms, plants or animals of the hulls of boats or aquaculture equipment (b) in wood preservation (c) in textile or yarn manufacture (d) in the treatment of industrial waters.</p>
<p>Organostannic compounds</p>	20	<p>Not to be used as a biocide in paints or coatings.</p>
<p>Potassium dichromate (in water analysis chemical kits)</p>	28	<p>Not be placed on the market, or used, as substances or as constituents of other</p>

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		substances or in mixtures, for supply to the general public above certain concentrations.
Potassium dichromate (in water analysis chemical kits)	29	Not be placed on the market, or used, as substances or as constituents of other substances or in mixtures, for supply to the general public above certain concentrations.
Potassium dichromate (in water analysis chemical kits)	30	Not be placed on the market, or used, as substances or as constituents of other substances or in mixtures, for supply to the general public above certain concentrations.
(D4) (D5) (D6)	40	Not to be used in aerosol dispensers for decorative purposes in the general public.
Potassium dichromate (in water analysis chemical kits)	47	Not to be used in cement mixtures at greater than 0.0002%
Toluene	48	Not to be used in spray paints or adhesives greater than 0.1% by weight
2-(2-butoxyethoxy)ethanol (DEGBE)	55	Not to be used in neoprene-based adhesives

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		greater than 0.1% by weight
Cyclohexane	57	Not to be used in spray paints or cleaners greater than 3% by weight
Methanol	69	Not to be used in windscreen washing or defrosting fluids, in a concentration equal to or greater than 0.6% by weight
Octamethylcyclotetrasiloxane (D4) Decamethylcyclopentasiloxane (D5) Dodecamethylcyclohexasiloxane (D6)	70	Not be placed on the market as a substance, a constituent of other substances; or in mixtures; in a concentration equal to or greater than 0.1 % by weight. Not to be used for dry cleaning purposes.
Potassium dichromate (in water analysis chemical kits)	72	Not to be used for clothing, textiles, footwear or upholstery.
Potassium dichromate and mercury sulphate (in water analysis chemical kits) Kluberpaste HEL Sulphuric acid Caustic soda	75	Not to be used in tattoo inks or permanent make-up

Table 4 Overview of the type of REACH candidate lists within the energy sector

Chemical	Candidate for inclusion under Annex XVII to REACH	Reason for addition
O,O,O-triphenyl phosphorothioate	PBT	Persistent, Bioaccumulative and Toxic (Article 57(d))
Nonylphenol, branched, ethoxylated	SVHC	Endocrine disrupting properties (Article 57(f))
Octamethylcyclotetrasiloxane (D4) Decamethylcyclopentasiloxane (D5) Dodecamethylcyclohexasiloxane (D6)	PBT, vPvB	Persistent, Bioaccumulative and Toxic (Article 57(d)) Very persistent and very bioaccumulative (Article 57(e))

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.
- The use and storage of PFOA-containing firefighting foams adhered to the EU Regulation on Persistent Organic Pollutants (EU) 2019/1021. All PFOA foam was brought out of use prior to the 3rd December 2025 deadline.
- 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, 20 minor non-conformances were raised. 6 sites were noted to be using UK REACH safety data sheets.

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 requirements and advised to contact their suppliers to ensure compliant Safety Data Sheets were obtained.
- Recommended placement of spill kits.
- Recommended disposal of legacy chemicals.

- Provided technical guidance to PFOA stockpile holders on the disposal of their firefighting foam.
- Worked collaboratively with colleagues in waste to ensure PFOA-containing firefighting foam was tracked through an appropriate disposal method.

6. How did we improve our service delivery?

We improved our service delivery by-

- Engaging directly with operators to ensure they were aware of relevant EU legislative updates, including the extension of compliance deadlines from July to December 2025

7. What we will do next

The next phase of regulating the energy industry will be 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 animal, vegetable and food processing industries.



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