

CASE STUDY

CHEMICAL MANAGEMENT AND COMPLIANCE

CLIENT: CONFIDENTIAL

LOCATION: UK

HIGHLIGHTS

- Chemical sweep and inventory of chemicals stored onsite
- Development of a compliant Chemical Register
- Oversight of COSHH regulated substances to ensure effective controls and regulatory compliance

THE CHALLENGE

Following an on-site Environmental Legal Compliance Audit at the client's site, several non-conformances were identified with regards to Chemical Management and COSHH (Control of Substances Hazardous to Health). Although the site held ISO 14001 certification, the compliance audit highlighted significant gaps in the control, documentation, and oversight of hazardous substances.

The findings pertained to unlabelled containers, incorrect storage, and missing and disorganised documentation (Safety Data Sheets (SDS) and COSHH Risk Assessments). The client required implementation of a system that would aid oversight of chemicals from across the site including laboratory chemicals and those in engineers' stores, allowing for them to be appropriately catalogued, with a compliant Safety Data Sheet (providing information on the specific product from the brand), and COSHH Risk Assessment (identifying the hazardous substance, and setting out the controls required based on the specific use of the product).



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THE SOLUTION

Arthian completed a review of chemical management documentation including the sites current chemical register, SDSs and COSHH Risk Assessments. Next, Arthian's environmental compliance consultant collaborated on-site with site staff to identify areas of chemical use and storage, and to plan and communicate the Chemical Sweep audit phase. The chemical sweep was carried out, developing an inventory of site chemicals in COSHH cupboards, chemical stores, cleaning cupboards and the site laboratory.

The site did not previously have a digital chemical register, so the products captured during the inventory were listed in an Excel spreadsheet, and key information was added for each. Arthian was given access to SDS information for a number of the chemicals and began to develop the Chemical Register with all available information for products captured during the inventory.

A bespoke Chemical Register was developed for the client, using clear reference numbers which aligned with SDS and COSHH Risk Assessment for document control, area of use, CAS numbers (unique numbering for chemical products) for performing key search functionalities like Persistent Organic Pollutant (POP) and REACH reviews.

The chemical sweep provided a site inventory list of chemicals which was developed by Arthian into a bespoke site Chemical Register which allowed the client to identify the substances regulated by COSHH onsite and therefore enable relevant documentation to be in place (such as SDS and COSHH Risk Assessments) in line with statutory requirements.

The Chemical Register is a vital tool in the site's environmental management system for compliance with COSHH Regulations. Being set up in Microsoft Excel allows the client to continue to utilise the register for the addition of new chemicals to site, in line with Management of Change EMS Procedures.



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ARTHIAN INSIGHTS:

CHEMICAL MANAGEMENT

Management of Change is emphasised in the new ISO 14001:2026 environmental management systems standard expected for publication from March 2026. Chemical Management is a live issue at sites, requiring controls to be in place for new, current, out of date and 'no longer used' chemicals in place. Staying on top of changes is key, as additional risks can quickly creep in.

Arthian recommend using Chemical Management techniques to identify, manage, communicate, raise awareness and train; use Chemical Management Audits to check the systems are effective, and to capture non-conformances and opportunities for improvement to implement.

Chemical management forms one of 13 technical area sections in the Arthian Environmental Legal Compliance Audits completed annually; for a deeper dive audit we also offer Chemical Management internal audits as a specific technical audit scope.



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