



Northern
Ireland
Office

Consultation Response

**Amendments to the Control of Explosives
Precursors etc. Regulations (Northern Ireland) 2014**

10 NOVEMBER 2025

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INTRODUCTION

1. On 27 May 2025, the Northern Ireland Office (NIO) launched a public consultation seeking views on proposed amendments to the Control of Explosives Precursors etc. Regulations (Northern Ireland) 2014. These proposals seek to strengthen the control of explosives precursors in Northern Ireland and bring in similar measures to those found in Great Britain.
2. As well as publishing on GOV.UK, links to the consultation were sent directly to a selection of relevant stakeholders including explosives precursors licence holders, industry bodies, and Northern Ireland political parties in order to encourage responses. The Police Service of Northern Ireland and the Health and Safety Executive Northern Ireland were also consulted. A link to the consultation was also shared on the Northern Ireland Office's X account
3. The consultation closed on 19 August 2025. This document provides an analysis of the responses received and the subsequent decision the Secretary of State for Northern Ireland has made to introduce legislation to implement these proposals.

Consultation Principles

4. This consultation process was conducted in line with the [Cabinet Office consultation principles](#) published in March 2018.

Equality

5. It is also being conducted in line with the [NIO Equality Scheme](#).
6. In accordance with section 75 of the Northern Ireland Act 1998, the NIO undertook an Equality Screening exercise¹ prior to the launch of this consultation to indicate whether there are equality of opportunity and/or good relations impacts associated with the proposed amendments to the Control of Explosives Precursors etc. Regulations (Northern Ireland) 2014.
7. The outcome of the screening exercise is that the likely impact of these proposals is "none" in respect of all of the section 75 categories. This is because the policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.
8. Following the conclusion of the consultation, the Northern Ireland Office reviewed the screening exercise in light of the consultation responses and assessed that its initial assessment of the likely impact of the proposals remained accurate.

¹ Read about the [Equality Commission's Section 75 guidance](#)

9. An Equality Screening of the impact of the proposals in this consultation is available online.²

Accessibility

10. This document is publicly available at the [Northern Ireland Office \(NIO\) website](#). You may make additional copies of this document without seeking permission. It can also be made available, on request, in different formats for individuals with particular needs.
11. If you require any additional copies or have any concerns or questions about this consultation process, you can contact:
- **By email:** explosivesprecursorsconsultation@nio.gov.uk
 - **In writing:**
Explosives Precursors Consultation
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² Read the [s75 Equality Screening for the explosives precursors consultation](#).

BACKGROUND

Introduction

12. The consultation sought views on proposed amendments to the Control of Explosives Precursors etc. Regulations (Northern Ireland) 2014 (the 2014 NI Regulations). The consultation was aimed at businesses who supply explosives precursors, professional users of explosives precursors, and members of the public who use explosives precursors in Northern Ireland.
13. Explosives precursors are chemical substances that can be used for legitimate purposes, for example in agriculture, horticulture, mining, quarrying, food production, science and education. However, at certain concentrations, they can be misused to manufacture homemade explosives.
14. Since the 1970s, legislation in Northern Ireland has prohibited the supply of certain substances to any person (whether a business or a member of the public) unless that person has a licence. These restrictions were specific to Northern Ireland and were put in place, and have been maintained, in order to limit the availability of chemicals that can be used in the illicit manufacture of explosives.
15. The 2014 NI Regulations were introduced so that Northern Ireland implemented Regulation (EU) 98/2013³ (the 2013 Regulation), while maintaining other specific restrictions in Northern Ireland. Since the 2014 NI Regulations were made, the 2013 Regulation has been repealed and replaced by Regulation (EU) 2019/1148⁴ on explosives precursors, and the Control of Explosives Precursors and Poisons Regulations 2023⁵, applying in Great Britain, were made.

Regulation (EU) 2019/1148 (the 2019 Regulation)

16. In order to facilitate dual access to both the UK Internal Market and the EU Single Market, Northern Ireland continues to apply the 2019 Regulation on the marketing and use of explosives precursors under the terms of the Windsor Framework. The purpose of the 2019 Regulation is to keep the public safe and secure from threats posed by terrorism and other criminal activities.
17. The 2019 Regulation, and the duties imposed on individuals and businesses, have applied in Northern Ireland since 1 February 2021, but consequential changes to the 2014 NI Regulations, such as replacing references to the 2013

³ [Read Regulation \(EU\) 98/2013](#)

⁴ [Read Regulation \(EU\) 2019/1148](#)

⁵ [Read the Control of Explosives Precursors and Poisons Regulations 2023](#)

Regulation with references to the 2019 Regulation, are required to ensure the 2019 Regulation is fully implemented.

The Control of Explosives Precursors and Poisons Regulations 2023

18. Following the Manchester Arena and Parsons Green explosives attacks in 2017 the Home Office carried out a detailed review of the legislation relating to controls of explosives precursors and poisons. The subsequent amendments to the law in Great Britain (by the Control of Explosives Precursors and Poisons Regulations 2023) strengthened the safeguards that were in place to prevent the illicit use of explosives precursors.
19. In respect of phosphoric acid, hydrochloric acid, hexamine and sulfur the controls in GB go further than equivalent controls under the 2019 Regulation and the 2014 NI Regulations.
20. The consultation therefore proposed to introduce similar restrictions in Northern Ireland to those in Great Britain, to ensure there is a consistent level of protection against the misuse of these substances across the UK.

Control of Explosives Precursors etc. Regulations (Northern Ireland) 2014 (the 2014 NI Regulations)

21. Under the 2014 NI Regulations, explosives precursors licensing in Northern Ireland is split into two tiers.
 - i. Tier 1 licences cover a specific set of explosives precursors, limiting access to both professional users and members of the general public. Controls of this nature have been in place in Northern Ireland since the 1970s. The list of Tier 1 substances can be found in Schedule 1 to the 2014 NI Regulations⁶. We are not proposing to make changes to the substances included within Tier 1.
 - ii. Tier 2 licences covered those substances which were in Annex I to the 2013 Regulation (but not where it is a Tier 1 substance). The requirement to have a Tier 2 licence applies only to members of the general public, and not to businesses. The proposal is to amend the definition of a Tier 2 substance to refer to the substances in Annex I of the 2019 Regulation, and as set out in more detail below to also include hydrochloric acid (above 10% w/w), phosphoric acid (above 30% w/w), and hexamine (at any concentration).

⁶ [Read Schedule 1 of the Control of Explosives Precursors etc. Regulations \(Northern Ireland\) 2014](#)

Key Proposed Amendments

Classification of Hydrochloric Acid, Phosphoric Acid, and Hexamine in Tier 2 substances in Northern Ireland:

22. The consultation asked for views on requiring members of the general public to hold a Tier 2 licence to supply, acquire, possess, import, and use hydrochloric acid (above 10% w/w), phosphoric acid (above 30% w/w) and hexamine (at any concentration). These restrictions would mirror the position in Great Britain and go beyond existing controls under the 2019 Regulation.
23. As a result of being included in Tier 2, the following obligations would also apply to those substances above the concentrations specified above, unless stated otherwise.
 - A duty on economic operators to inform other economic operators to whom they provide hydrochloric acid, phosphoric acid or hexamine that the explosives precursor is subject to restrictions, and (at any concentration) reporting obligations (*applying Article 7(1) of the 2019 Regulation*). This duty already extends to hexamine in respect of notification about reporting obligations, by virtue of its inclusion in Annex II of the 2019 Regulation.
 - A duty on economic operators when providing hydrochloric acid, phosphoric acid (at any concentration) to professional users or members of the general public, to ensure that its personnel are aware of which products contain the explosives precursor and are instructed on their obligations. Online marketplaces must ensure those making these explosives precursors available are informed of their obligations (*applying Article 7 (2) and (3) of the 2019 Regulation*). This duty already extends to hexamine, by virtue of its inclusion in Annex II of the 2019 Regulation;
 - A duty on economic operators to request, each time they supply hydrochloric acid, phosphoric acid or hexamine to a member of the public, proof of the individual's identity and licence. Economic operators must also request, each time they supply hydrochloric acid, phosphoric acid or hexamine to a professional user or another economic operator, information on the prospective customer and the intended use of the precursor. This information must be retained for 18 months. Online marketplaces must help ensure its users who make available these explosives precursors comply with these obligations (*applying Article 8 of the 2019 Regulation*);

- A duty on economic operators and online marketplaces to have procedures in place to detect, and to report, suspicious transactions of hydrochloric acid and phosphoric acid (*applying Article 9 of the 2019 Regulation*). This duty already extends to hexamine by virtue of its inclusion in Annex II of the 2019 Regulation;
 - A duty on economic operators and professional users to report significant disappearances and thefts of hydrochloric acid or phosphoric acid (at any concentration) within 24 hours to the police (*applying Article 9 of the 2019 Regulation*). This duty already extends to hexamine by virtue of its inclusion in Annex II of the 2019 Regulation;
 - A duty on members of the general public who hold a Tier 2 licence for hexamine, hydrochloric acid or phosphoric acid to report significant disappearances and thefts of that substance within 24 hours to the police (*applying Article 9 (6) of the 2019 Regulation*).
24. These obligations already apply in Northern Ireland in respect of the other explosives precursors found in Annex I of the 2019 Regulation, and are similar to obligations in relation to phosphoric acid, hydrochloric acid, and hexamine in Great Britain.

Addition of Sulfur to the List of Reportable Substances

25. The consultation sought views on making sulfur a reportable substance, mirroring the position in Great Britain. As a result, the following obligations would apply in respect of sulfur at any concentration:
- A duty on economic operators to inform other economic operators to whom they provide sulfur that the explosives precursor is subject to reporting obligations (*applying Article 7 (1) (second sentence) of the 2019 Regulation*);
 - A duty on economic operators when providing sulfur to professional users or members of the general public, to ensure that its personnel are aware of which products contain sulfur, and are instructed on their legal obligations. Online marketplaces must also ensure those making sulfur available are informed of their obligations (*applying Article 7 (2) and (3) of the 2019 Regulation*);
 - A duty on economic operators and professional users to report significant disappearances and thefts of sulfur within 24 hours to the police (*applying Article 9 (1) to (5) of the 2019 Regulation*).

26. These obligations already apply in Northern Ireland in respect of the explosives precursors found in Annexes I and II of the 2019 Regulation, and are similar to the obligations in relation to sulfur in Great Britain.

Supplying and Reporting Obligations

27. The consultation asked for views on requiring suppliers of both Tier 1 and Tier 2 substances to instruct their employees on their legal obligations under the 2014 NI Regulations. This would supplement Article 7(2) of the 2019 Regulation, which already applies in Northern Ireland, and places an obligation on suppliers of substances found in Annex I or Annex II of the 2019 Regulation to instruct their personnel of their obligations under the 2019 Regulation.
28. This is similar to the duty on suppliers to ensure that their workers are provided with relevant information about the requirements that apply in relation to certain explosives precursors, which applies in Great Britain under the Control of Explosives Precursors and Poisons Regulations 2023.
29. The consultation also sought views on requiring a member of the general public who holds a Tier 1 licence to report significant disappearances and thefts of that substance within 24 hours to the police. This supplements the obligation to report significant thefts and disappearances found in Article 9 of the 2019 Regulation, which already applies in Northern Ireland and applies to economic operators and suppliers (including those with Tier 1 licences), and Tier 2 licence holders.

Consequential changes to the Control of Explosives Precursors etc. Regulations (Northern Ireland) 2014 as a result of the 2019 Regulation

30. While the 2019 Regulation, and the duties imposed on individuals and businesses, have applied in Northern Ireland since 1 February 2021, consequential changes to the 2014 NI Regulations, such as replacing references to the 2013 Regulation with references to the 2019 Regulation, are required to ensure the 2019 Regulation is fully implemented. This would mean that the definition of a Tier 2 substance is amended to refer to the substances in Annex I of the 2019 Regulation, rather than the 2013 Regulation, and would allow Tier 2 licences to be issued again.

Consultation Question

31. On 27 May 2025, the Northern Ireland Office launched a consultation asking, "Do you have any views on the proposed amendments to the Control of Explosives Precursors etc. Regulations (Northern Ireland) 2014?" The consultation closed on 19 August 2025.

CONSULTATION RESPONSES

Methodology

32. The Northern Ireland Office wrote to over 200 licence holders, trade bodies, elected representatives and other stakeholders to highlight the consultation. A link to the consultation was also posted by the Northern Ireland Office's X and LinkedIn accounts.

Responses Received

33. The consultation received nine responses. These were from (in alphabetical order):

- Agricultural Industries Confederation
- Cosmetic, Toiletry and Perfumery Association
- Health and Safety Executive Northern Ireland
- Minister of Justice, Department of Justice Northern Ireland
- Northern Ireland Grain Trade Association
- Police Service of Northern Ireland
- Precision Processing Services Ltd
- Senior science technician at a Northern Ireland secondary school
- United Kingdom Rocketry Association

34. After analysing the responses, the Northern Ireland Office has assessed that:
- 7 respondents **supported/accepted** the proposals,
 - 0 respondents **objected** to the proposals; and
 - 2 respondents **neither clearly support nor object** the proposals

ANALYSIS OF RESPONSES

Responses supporting/accepting the proposed amendments

35. There were seven responses that the Northern Ireland Office assessed to be in support/accepting of the proposed amendments.
36. These responses mainly justified their support/acceptance with reasons such as:
- The importance of ensuring a consistent level of protection against the misuse of explosives precursors across the UK.
 - The benefits to businesses in reducing regulatory divergence between Great Britain and Northern Ireland.
 - The proposals have a negligible cost on businesses using explosives precursors as they already operate under strict controls.
 - The proposals provide legal clarity by reflecting the revised 2019 Regulation, which has applied in Northern Ireland since 1 February 2021.

Responses Neither Supporting Nor Objecting

37. There were two responses that the Northern Ireland Office assessed as neither clearly supporting nor objecting to the proposed amendments. This was either because no comment was offered, or the proposals were not considered to have an impact on the respondent.

Impact on specific sectors

38. Some consultation responses set out the assessed impact the proposals would have on their specific sector.
39. **Cosmetics:** Given hydrochloric acid, hexamine, and sulfur are not used in cosmetic ingredients, the proposals relating to these substances would have no expected impact on the industry. Phosphoric acid is used in cosmetics, but given the proposed changes are aligned with existing Great Britain requirements there will be a negligible impact on the cosmetics industry overall.
40. **Schools:** Given only members of the general public require a licence for Tier 2 substances, as professional users schools would not require licences to use phosphoric acid, hydrochloric acid, and hexamine. Suppliers selling these substances to professional users would be required to request information on the prospective customer and the intended use of the precursor, as is

currently required in Great Britain, and in Northern Ireland for the substances in Annex I of the 2019 Regulation. The consultation respondent noted this “operation is already in place” for their purchases.

41. **Rocketry:** Wider legislation already prevents rocket motor manufacture in the UK and Ireland, so the proposed amendments would not have an impact on their sector.
42. **Agricultural industries:** One response stated that reducing divergence between regulations in Great Britain and Northern Ireland would allow those in the agri-supply industry to maintain consistent working systems across sales and supply. Another response was also supportive of reducing regulatory divergence between Great Britain and NI, while requesting clear updated guidance.

Discussion

43. As set out in more detail above, the Government’s main proposal is to control hexamine, hydrochloric acid, phosphoric acid and sulfur in Northern Ireland in the same way as in Great Britain. To achieve this, we proposed to apply the relevant provisions of 2019 Regulation to these substances.
44. As stated in the consultation document, our hypothesis is that this will ensure that the processes and procedures those dealing with explosives precursors in Northern Ireland have already put in place to comply with the 2019 Regulation can be extended to cover the four additional substances, making compliance and enforcement simpler. These obligations of the 2019 Regulation are akin to those applying to these substances in Great Britain.
45. Matching the restrictions in Great Britain will create a more consistent regulatory framework across the UK. The restrictions in Great Britain have already had the effect of limiting availability of these substances in Northern Ireland, and in dealing with enquiries about licensing, the Northern Ireland Office has found that members of the public in Northern Ireland wrongly believe that licences are currently required for the same substances as in Great Britain.
46. A key theme from the responses was the recognition that the proposed changes would largely have a negligible impact on businesses using explosives precursors, as they already operate under strict controls. The responses also indicated support for reducing regulatory divergence between Northern Ireland and Great Britain.
47. For instance, the cosmetics industry expected a minimal impact on their sector due to the impact of existing controls in Great Britain, which we are

seeking to mirror. Similarly, a school indicated no significant change, as their current practices for purchasing explosives precursors already align with the proposed verification requirements.

Guidance

48. A common theme across a number of consultation responses was a request for clear guidance to be published to assist with compliance. The Northern Ireland Office will ensure that clear and detailed guidance will be provided alongside any legislation.

Informing the supply chain and instructing employees

49. A respondent raised a concern that the commercially sensitive nature of ingredient concentrations in some cosmetic products may mean that retailers and their staff will not know the concentration at which an explosives precursor is present. Another requested updated guidance and materials to support staff training.
50. Pursuant to Article 7 of the 2019 Regulation, economic operators in Northern Ireland are currently under obligations to inform the supply chain when making available certain explosives precursors and to instruct their personnel of their obligations under the 2019 Regulations.
51. The Government's proposals intend to supplement these already existing obligations, so that the processes and procedures already in place can be used in relation to informing the supply chain and informing personnel can be utilised in relation to the 2014 NI Regulations. Furthermore, given economic operators are under similar duties in Great Britain, our proposals will create a consistent framework across the UK which will help economic operators provide consistent information across the supply chain.
52. The Northern Ireland Office will ensure that thorough guidance will be provided in relation to amendments to the 2014 NI Regulations and controls of explosives precursors in Northern Ireland, and will continue to work across Government, with policing colleagues, and with industry partners to raise awareness.

Reporting significant disappearances or thefts

53. One respondent specifically supported the proposal to require members of the general public in possession of a Tier 1 licence to report significant disappearances or thefts to the police within 24 hours. This supplements the obligation to report significant thefts and disappearances found in Article 9 of the 2019 Regulation, which currently applies in Northern Ireland to economic operators and suppliers (including those with Tier 1 licences), and Tier 2 licence holders.

54. However, the respondent expressed the view that members of the general public are likely to require guidance and support to understand their obligations, including guidance on what information will be required to be reported in cases of disappearances or thefts. The Northern Ireland Office will ensure that thorough guidance is provided on this point.

Reporting suspicious transactions

55. One respondent raised a concern that reactive, non-standard chemical acquisitions may be flagged as suspicious transactions, which would cause delays.
56. For the purpose of preventing and detecting the illicit manufacture of explosives, economic operators and online marketplaces in Northern Ireland are currently under a duty to report suspicious transactions through Article 9 of the 2019 Regulation. This duty applies to substances listed in Annex I or II of the 2019 EU Regulation.
57. Our proposal is to extend this duty to phosphoric acid and hydrochloric acid, to mirror the position in Great Britain.
58. The Northern Ireland Office will ensure that thorough guidance is provided on this point and share with operational partners the concerns raised in the response.

SECRETARY OF STATE DECISION

59. The Secretary of State for Northern Ireland thanks all individuals and organisations who took the time to respond to this public consultation, and was pleased to see respondents from a number of different sectors.
60. The majority of respondents were in favour of the proposed amendments to the 2014 NI Regulations, citing the importance of protecting the public from the misuse of explosives precursors, and reducing regulatory divergence between Northern Ireland and Great Britain. No respondents objected to the proposals.
61. The Secretary of State notes that respondents highlighted that the proposals would have a negligible cost to business, but has considered the concerns raised by stakeholders regarding the need for clear and thorough guidance so those wishing to use or supply explosives precursors are aware of their obligations.
62. Having reviewed and analysed the responses, the Secretary of State for Northern Ireland has decided that:

- 1) Secondary legislation will be introduced to amend the Control of Explosives Precursors etc. Regulations (Northern Ireland) 2014 to strengthen the control of explosives precursors in Northern Ireland and bring in similar measures to those found in Great Britain. This legislation will also ensure that Regulation (EU) 2019/1148 is fully implemented as required by the Windsor Framework.
- 2) Thorough guidance will be published alongside secondary legislation, to provide all prospective users of explosives precursors information on their legal obligations.