

2026

Control of Substances Hazardous to Health Regulations 2025 Consultation Report

PUBLIC CONSULTATION RESULTS

Health and Safety Inspectorate

Version Control

1	Health and Safety at Work Inspectorate (HSWI)	05/05/2026	Initial
2	HSWI	01/06/2026	Review

Control of Substances Hazardous to Health Regulations 2025 Consultation Report

https://consult.gov.im/_admin/environment-food-and-agriculture/control-of-substances-hazardous-to-health

This report was created on Tuesday 05 May 2026 at 10:31

The activity ran from 15/12/2025 to 31/03/2026-

Responses to this survey: 5

EXECUTIVE SUMMARY OF RESPONDENT COMMENTS:

The public consultation on the proposed IOM Control of Substances Hazardous to Health (COSHH) Regulations 2025 sought views on aligning Island health and safety legislation with established UK standards, the clarity of the draft regulations, the proposed implementation strategy and timescale, and the support mechanisms required to assist compliance.

A total of five responses were received, representing a mix of business and stakeholder organisations, local authorities, and IOM Government interests. Overall, respondents were strongly supportive of aligning IOM COSHH legislation with UK Health and Safety Executive standards, viewing this as best practice that improves consistency, clarity, and understanding, particularly for organisations operating across jurisdictions.

Views on the clarity of the draft regulations were mixed. While some respondents considered the proposals sufficiently clear, particularly those already operating under UK COSHH, others identified a need for clearer practical guidance, especially for smaller organisations and those less familiar with formal COSHH assessment processes. Respondents emphasised the importance of clear signposting to relevant UK guidance and Approved Codes of Practice (ACOP) to support consistent interpretation and compliance.

A majority of respondents considered the proposed implementation approach and timescale to be appropriate in principle; however, a significant minority raised concerns about industry readiness. These concerns focused on training capacity, availability of competent health and safety expertise, occupational health provision, and the cumulative impact of multiple health and safety legislative changes being progressed over a similar timeframe. Several respondents highlighted the potential challenges for smaller organisations in achieving compliance within the proposed timescales.

Most respondents indicated that additional support mechanisms would assist with successful implementation of the regulations. Suggested measures included clear guidance aligned to UK material, practical workshops or briefings, definition of acceptable training standards, transitional arrangements, and targeted support for small businesses. More broadly, respondents highlighted the importance of ensuring sufficient island-wide capacity to deliver training, advisory support, and occupational health services.

Overall, feedback on the draft COSHH Regulations was positive, with respondents welcoming the modernisation of health and safety legislation and the formalisation of alignment with UK standards. Respondents stressed the importance of clarity, proportionality, sufficient lead-in time, and coordinated implementation planning to ensure that the regulations are introduced effectively and sustainably across all sectors.

We asked:

The Department of Environment, Food and Agriculture (DEFA) has been reviewing specific UK Health and Safety legislation to form a judgment on whether the Island would benefit from greater alignment with UK Health and Safety Executive (HSE) standards. As part of that process, consideration has also been given to whether this UK HSE legislation would enhance public and worker safety for offshore energy developments. This process has culminated in public consultation of specific draft legislation, with the starting point for most of the legislation being existing UK legislation.

DEFA has welcomed stakeholder and public feedback on the proposed health and safety legislation, and where appropriate any associated guidance documentation, through this public consultation process.

You Said:

Respondents showed strong support for aligning the IOM Control of Substances Hazardous to Health (COSHH) Regulations with established UK standards, viewing this as best practice that improves consistency and understanding.

While some considered the draft regulations sufficiently clear, others identified a need for clearer practical guidance, particularly for smaller organisations and clearer signposting to relevant UK guidance and ACOP.

Most respondents considered the proposed implementation approach appropriate in principle, but some raised concerns about industry readiness, training and advisory capacity, and the cumulative impact of multiple health and safety legislative changes. Many respondents indicated that additional support, guidance, and transitional arrangements would assist organisations in preparing for compliance.

We did:

The DEFA Health and Safety at Work Inspectorate (HSWI) is grateful to all those who took the time to consider and respond to this consultation.

Due to the December 2025 holiday period and the limited number of initial responses received, it was decided to extend the closing date of the outstanding health and safety legislation consultations to 31 March 2026.

The consultation process and responses received informed the Department's assessment of the benefits of the proposed legislation. All consultation responses were considered in detail, alongside direct engagement with relevant Manx businesses. The consultation process has therefore informed the Department's decision making. Having considered all available information, the Department has decided to pause the introduction of this tranche of legislation until further notice.

Further engagement between DEFA HSWI and the UK Health and Safety Executive (HSE) will take place in June 2026. Should the Department subsequently decide to proceed with the introduction of any of the draft legislation, this will first be reviewed against the latest position of the relevant

UK legislation and updated where necessary. If any substantive changes are made as a result, a further public consultation exercise may be undertaken.

Control of Substances Hazardous to Health Regulations 2025 Health and Safety Legislation Consultation

CONSULTATION QUESTIONS

Question Number	Title	Total Responses
1	Do you agree that the Isle of Man should follow UK standards and processes for health and safety laws and its regulation?	5 (100.00%)
2	Are there any parts of the legislation being consulted upon that require more clarity to aid understanding and assist with compliance?	5 (100.00%)
3	Is the proposed implementation strategy and timescale for the introduction of the Control of Substances Hazardous to Health Regulations 2025 appropriate for industry readiness?	5 (100.00%)
4	Are there any specific support mechanisms (e.g. guidance, training, transitional arrangements) that would help you or your organisation prepare for the new legislation?	5 (100.00%)
5	Do you have any other comments on the draft IOM Control of Substances Hazardous to Health Regulations 2025 legislation attached to this stage of the overall consultation process?	2 (40.00%)
6	Is there anything else you'd like to tell us about the proposed changes or the consultation process?	4 (80.00%)

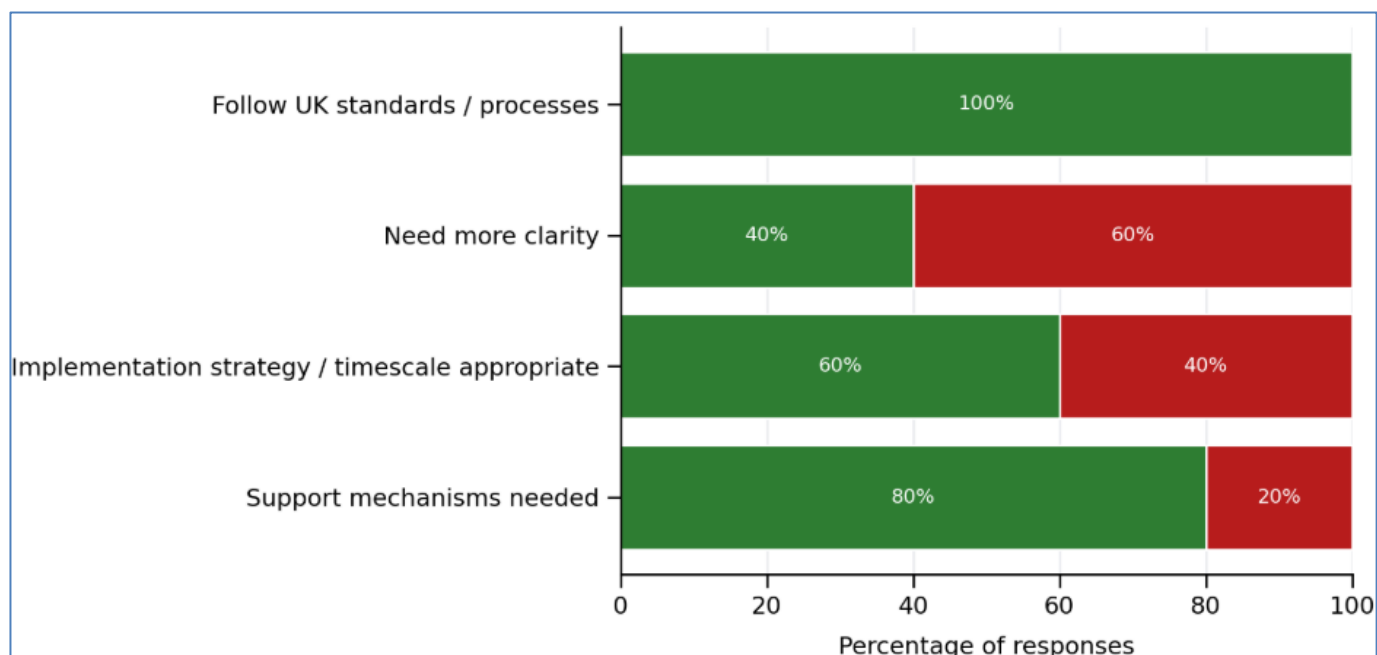


Fig 1:
Question (Q1–Q4) - Percentage of Responses (Yes/Agree, No/Disagree, Not Answered)

CONSULTATION QUESTIONS – SUMMARY OF RESPONSES BY QUESTION

Q1 – Alignment with UK standards and processes

There was unanimous support for the IOM following UK standards and processes for health and safety regulation. Respondents consistently viewed alignment with UK Health and Safety Executive standards as best practice, noting benefits in terms of consistency, clarity, and reduced regulatory burden for organisations operating across both jurisdictions. Several respondents emphasised that alignment formalises existing practice and supports improved understanding and compliance across industry and the public sector.

Q2 – Need for additional clarity to aid understanding and compliance

Views were mixed on whether further clarity is required. While some respondents considered the draft regulations sufficiently clear, particularly those already operating under UK COSHH, others identified areas where additional clarity would assist compliance. These comments focused on practical application rather than policy intent, including clearer explanation of COSHH assessment processes, proportionality for smaller organisations, and more explicit signposting of which UK guidance documents and ACOP should be followed.

Q3 – Implementation strategy and timescale

A majority of respondents considered the proposed implementation strategy and timescale to be appropriate in principle; however, a significant minority raised concerns about industry readiness. Those expressing concerns highlighted constraints relating to training capacity, availability of competent occupational health and safety expertise on the Island, and the cumulative impact of multiple health and safety legislative changes being progressed in parallel. Particular concern was expressed about the impact on smaller organisations and the ability to achieve full compliance within the proposed timeframe.

Q4 – Support mechanisms to aid implementation

Most respondents indicated that additional support mechanisms would assist organisations in preparing for the new regulations. Suggested measures included clearer written guidance aligned to UK HSE material, practical workshops or briefings, definition of acceptable training standards, transitional arrangements, and targeted support for smaller businesses. Several respondents also raised broader system capacity issues, including training provision, consultancy availability, and occupational health services, noting that these factors would be critical to successful island-wide implementation.

Q5 – General comments on the draft COSHH Regulations

Overall feedback on the draft Regulations was positive, with respondents welcoming the modernisation of health and safety legislation and the formal alignment with UK standards. Comments emphasised the importance of consistency in structure and numbering with UK regulations to support understanding and compliance, particularly for contractors and training providers working across jurisdictions. Respondents also highlighted the need for clarity, proportionality, and adequate lead-in time to ensure effective and sustainable implementation.

Q6 – Additional comments on the consultation process and wider impacts

A number of respondents raised wider points relating to the pace and coordination of multiple concurrent health and safety consultations. Comments included questions about prioritisation, cumulative impact across sectors, awareness levels among affected organisations, and inspectorate capacity to support guidance and enforcement. Some respondents suggested that a more strategic, cross-sector approach to implementation planning would help ensure that the combined impact of legislative change remains manageable, particularly for smaller employers.