

**Summary of responses to the proposals to amend RSA charges**  
**Consultation closed 15 March 2010**

SG No.	Respondent	Query	SEPA Response
1	SSERC	Is it fair that when our small practices with eluting sources are brought under the new exemption order we have to pay to de-register	Any changes in permitting (and associated fees) required as a result of new legislation will be assessed by SEPA on a case by case basis. A decision on appropriate charges can only be taken once new legislation has been finalised. New legislation often incorporates transitional arrangements which may have specific requirements regarding cancellation of permits and charging.
2	Coca Cola	Minimal increase	No response required
4	Chevron	<p>1. The proposed charges appear excessive for cost recovery</p> <p>2. Not clear what reasons for increase are – further explanation requested</p>	<p>1. Charges are set to achieve cost recovery. SEPA are not permitted to make a profit or loss when setting charges.</p> <p>2. Regulation of HASS and SSLPH is new and additional to the RSA workload.</p> <p>The High-Activity Sealed Radioactive Sources and Orphan Sources Regulations 2005 (the HASS Regulations) came into force on 20 October 2005 and amended the Radioactive Substances Act 1993 (RSA93). The HASS Regulations apply to all new high-activity sources from 1 January 2006 and were extended to include existing high-activity sources from 1 January 2008. The HASS Regulations introduced new measures which increased costs of regulation:</p> <ul style="list-style-type: none"> <li>• to require applications for variation of registrations and authorisations to take account of HASS activities</li> <li>• requiring SEPA to ensure the adequate security of premises where high-activity sources, or other sealed 'sources of a similar level of potential hazard' (SSLPH) , are held</li> <li>• requiring SEPA to ensure that adequate provision, by way of a financial security has been made for the safe management of disused sources</li> <li>• A requirement for SEPA to keep records of all registered persons keeping or using high-activity sources and a record of the sources they hold.</li> <li>• Previously revocation and</li> </ul>

			<p>cancellation charges were not included in the existing scheme so SEPA were not recovering these costs.</p> <ul style="list-style-type: none"> <li>• HASS and SSLPH work now requires SEPA working cooperatively with the Counter Terrorism Security Advisors (CTSA)</li> </ul> <p>SEPA has a new duty to regulate disposal facilities for Low Level Waste to near surface facilities (repository) and disposal of High Volumes of Very Low Level Waste to specified landfill sites.</p> <p>The RSA Charging scheme has achieved only 96% cost recovery since 2006/07.</p>
6	Inspection Ecosse	How can you suddenly realise operating costs are running at a loss and expect us to bail you out?	This was not a sudden realisation. New regulations came in 2005. We have been assessing increased costs and necessity and size of increases before consulting. EA increased their charges in 2005.
7	LUX Innovate	Suggest lower fees for SMEs. Cannot understand esp. subsistence charge increases	See 4
8	QuinetiQ	No issues and accept increases	No response required
9	Aberdeen Radiation Protection Services Ltd	Highlighted several areas where SEPA service can be improved. Welcomed the introduction of refunds for revocations.	SEPA are keen to improve levels of service and will look at the service levels highlighted to review further.
10	Scottish Radiation Protection Advisory Group	<p>Not fully clear on the justification for the variation fee.</p> <p>Do not agree with the charge for revocations and would prefer a similar approach to the EA</p> <p>Why is cancellation fee for Section 7/10 greater than the initial application fee?</p> <p>Invoices are often inaccurate and unclear which registration or authorisation they apply to;</p> <p>Correspondence is not sent to</p>	<p>See 4</p> <p>The SEPA approach to revocations ensures a proportionate recovery of costs and refunds to those not using their authorisations.</p> <p>Cancellation fees include the costs of ensuring formal disposal of any sources is legal and completed. This is additional to application work. I circumstances when sources are replaced like-for-like then cancellation fees may be waived.</p> <p>SEPA has reviewed and revised the accuracy of its customer and activity data and has improved performance. We will continue to do so.</p> <p>Records are constantly reviewed and</p>

		<p>the correct respondent;</p> <p>Payments are normally paid by cheque with the application. Other methods confuse the system,</p> <p>Yearly return is duplicated when making SPRI returns – there should be one returns system;</p> <p>The length of time to process applications is far too long.</p> <p>The application system should be electronic.</p> <p>Need clear guidance for inspectors and users as to what constitutes a variation.</p> <p>There are substantial differences in interpretation between officers and offices as to what is a variation.</p> <p>All SEPA offices should acknowledge receipt of applications and state determination period.</p> <p><i>It is not easy to agree with these proposals without an undertaking that SEPA performance will improve.</i></p>	<p>cleansed and customers should be seeing a substantial improvement on this measure.</p> <p>Payments are accepted by several methods. Details are in the charging scheme.</p> <p>SEPA is currently developing better regulation practices which aim to</p> <ul style="list-style-type: none"> <li>• Minimise number of returns</li> <li>• Reduce processing times</li> <li>• Make all applications electronic</li> <li>• Better guidance</li> <li>• More consistent</li> </ul> <p>SEPA will further investigate differences between teams approach to issuing receipts and move to standardise the approach taken</p>
11	National Museums Scotland	Charges are inflexible and unsuitable for our non standard needs	Tailored charges for all non standard activities would add undesirable complexity to the scheme
12	Scottish National Blood Transfusion Service	It may be possible given that we are a public body that this may be looked at again	Charges are set in accordance with Govt and Treasury Guidelines to recover the actual costs of regulation and monitoring. Charges are designed to be equitable and do not differentiate licence holders as public or non-public bodies.
13	NHS Greater Glasgow and Clyde	Disappointed that variation charges are proposed.	Amendments to the Regulations to include variations of HASS source authorisations have increased SEPA costs. SEPA has been previously under recovering its costs to process applications (including variations) and is required to achieve cost recovery across all aspects of RSA work.
		Single site authorisations could	NHS Glasgow should contact their

		replace separate activity authorisations.. could large organisations with multiple sites benefit from efficiency savings ...?	local SEPA staff to discuss the opportunities for the single site licensing and cost reductions. Staff will help them explore their options although the efficiencies available when regulating single sites with multiple sources are not generally available across geographically separate sites.
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