

Forty Fifth Meeting of the Scottish Non-Nuclear Industries Liaison Group (SNNILG) – Minutes

Wednesday 18th March 2026

Time: 10am -12pm

Location: Virtual via Teams

Attendees: SEPA – chair, secretariate & policy team reps, AWE- Defence Radiation Protection Services (DRPS), Scottish Schools Education Research Centre (SSERC), Institute of Physics and Engineering in Medicine (IPEM), Scottish Radiation Protection Advisers (SRPA), Society for Radiological Protection (SRP), NHS Tayside, Association of University Radiation Protection Officers (AURPO), NHS Greater Glasgow and Clyde (NHS GGC), Office for Nuclear Regulation (ONR) Safeguards, Offshore Energies UK (OEUK), Northern Ireland Environment Agency (NIEA), Health and Safety Executive (HSE), UK Health Security Agency (UKHSA), Environment Agency (EA), Police Scotland

Apologies: Scottish Government (SG), ONR Transport

Welcome, introduction and apologies

As noted above.

Actions

Action: SEPA to check with the CTSA whether the SRD owner can allow access to appropriate persons within their organisation, e.g. head of security, on case-by-case basis

*CTSAs have confirmed that the SRD has been issued on the understanding that it is stored securely but can be shared on a case-by-case basis if others need justifiable access, i.e. head of security etc. **CLOSED***

New action: SEPA to send anonymised details from examples of incidents which occurred where onshore service providers did not have an EASR authorisation in place but received contaminated items.

New action: Any updates from the SRPA short life working group looking into offsite disposal following medical administrations to be shared with SNNILG when they become available.

SEPA Update

General

Restructure of the Regulation Business and Environment Portfolio

SEPA is currently in the process of restructuring the Regulation Business and Environment Portfolio. Ross Haggard has been appointed permanent Chief Operating Officer about 6 months ago and work has progressed to define what the organisation below this level looks like. Six business areas have been identified, two of which are important to radioactive substances.

The intention is to split the current RS unit between the Chief Regulators Office which is headed up by Paul Dale and a Specialist Regulation Unit which is headed up by Gary Walker. Our policy team will go with Paul, and it is expected that they will be joined by other SEPA policy and strategy teams. Our operations, nuclear decommissioning and science teams will go with Gary. The intent is that we will still work very closely together whilst allowing greater integration with other parts of SEPA business.

New website

SEPA is in the process of migrating all content to the newer beta website with the intention of decommissioning the legacy website over the summer. The RS content is being moved in the next month or so. Areas relating to EASR applications and notifications will be moved to the EASR webpages and the remaining RS information will be moved to a newly created Radioactive Substances webpages in the beta site. Policy provided a high-level overview demonstration of the new webpages.

SNNILG was requested to provide feedback on the new website when a link to it is sent out. Any minor issues e.g. link not working, typo etc. should be reported via the 'contact us' section on the website, but any other issues with e.g. ease of use, technical information, layout etc. should be emailed directly to Lindsey Adams and Lucy Collins.

There was a question on why the schedules from the standard conditions have not been included in the guide to the standard conditions, because many operators prefer to only refer to the guide rather than switching between the guide and the standard conditions for the schedules. SEPA's answer is that it was originally assumed that the schedules are self-explanatory so weren't needed in the guide, but the guide has since been updated to include the schedules. There is currently a hold on publishing documents to the web until after the Scottish election on 7th May, so the revised guide will be published as soon as possible after that.

Operations Team Update

New IPEM excretion factors

Adopted the latest IPEM radiopharmaceutical excretion factors for use in SEPA assessments.

Management of contaminated items from offshore

There continues to be instances where contaminated items are sent from offshore premises to onshore premises, often for cleaning or refurbishment. In some instances, the items have been monitored offshore and no contamination was identified. For others, the offshore monitoring is less convincing. Generally, only accessible surfaces are checked as disassembling the item in the offshore environment to check internal surfaces can be challenging. Allowing the item time to properly dry is also difficult due to lack of suitable storage space. Even if no NORM has been identified when monitoring externally or open ends of equipment, there may still be NORM contamination present on the internal surfaces. If the item has been sent to an onshore site without an EASR authorisation this causes a compliance issue for both the offshore and onshore operators. In the past we have advised consideration is given to the likelihood of internal contamination occurring on inaccessible surfaces and taking cautious approach - if in doubt assume that there is NORM contamination and deal with it appropriately.

There is some evidence that offshore operators are now asking onshore service providers to have an EASR authorisation in place. This is a good option where there is potential to handle contaminated items. Typically, the level of authorisation is a permit. However, there may be some instances where a registration could be applicable but there are limitations to this e.g. not item of waste, not an item received from outside the UK, not more than 20MBq.

New action: SEPA to send anonymised details from examples of incidents which occurred where onshore service providers did not have an EASR authorisation in place but received contaminated items.

There was a discussion about the proportionality of onshore sites having permits just in case NORM is detected when they perform monitoring:

Q: There is no requirement for on shore recipients of items from offshore to monitor, and the NORM is only being detected because they are monitoring. Permitting all these onshore service providers is an onerous task for very little risk.

A: The amounts of NORM are small but above the GBR level. It is in everyone's interests to monitor, from both an environmental standpoint and a health and safety standpoint.

Policy Team Update

Joint position statement on the Adoption of Revised ICRP Public Dose Coefficients for prospective dose assessment in the UK

SEPA, EA, NRW and NIEA have produced a joint statement on the revised International Commission on Radiological Protection (ICRP) public dose coefficients.

Background:

ICRP is publishing revised public effective dose coefficients for inhalation and ingestion of radionuclides in five parts with different publication dates, and they will supersede the current dose coefficients published in ICRP Publication 119. Part 1 has been published, Parts 2 and 3 are expected to be published in 2026, Parts 4 and 5 expected to be published in the future.

UK coordinated approach to adoption:

Revised dose coefficients may affect the outcome of prospective dose assessments used to support permit or authorisation determinations, as well as retrospective dose

assessments such as those reported in the Radioactivity in Food and the Environment (RIFE) report.

A multi-agency working group led by the Department of Energy Security and Net Zero (DESNZ) has proposed a phased approach to adopting the amended dose coefficients with Parts 1, 2 and 3 adopted after publication of Part 3 in Batch 1 and adoption of Parts 4 and 5 after publication of Part 5 in Batch 2. Legislative changes will be required to adopt the amended dose coefficients. Timescales for legislative changes are currently not known and may vary across the devolved administrations.

Until legislative changes are complete, regulators will continue to apply the dose coefficients in ICRP Publication 119 in prospective dose assessments. Meanwhile, the environmental regulators are considering the impact of the revised dose coefficients before they are adopted.

Advice for Applicants & Operators:

Applicants and operators should continue using ICRP 119 coefficients in prospective dose assessments included within a permit application and/or variation. Existing tools such as EA's Initial Radiological Assessment Tool (IRAT2) and SEPA's Radiological Dose Assessment Tool (RDAT), and associated guidance remain valid, as these will not be updated until changes to legislation come into effect. Regulators will communicate implementation dates once agreed.

Consultations

Our consultations on the following closed on 12th May 2025:

- [Objectives and Principles for Regulating Radioactive Substances Activities](#)
 - [Environmental Standards for Inputs of Radioactive Substances into Groundwater](#)
 - [Near-surface Disposal Facilities on Land for Solid Radioactive Wastes: Guidance on Requirements for Authorisation \(Near Surface GRA\)](#)
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We had aimed to publish interim (very high-level, non-constraining) consultation digests around the 12-week post-consultation mark. Unfortunately, the draft digests have encountered delays within SEPA's approvals processes, and we do not yet know when we'll be able to make them available.

UK strategy for radioactive discharges: progress review

UK Government has commenced work, with the regulators and other public bodies, on a review of progress against its UK Strategy for Radioactive Discharges. The review will make use of existing data returns, generic information will be presented for projections from non-nuclear sectors, and so no additional information is being sought from non-nuclear operators. Publication is expected later in the year.

Scottish Government Update

Upcoming Scottish Elections

The Scottish Parliamentary elections are due to take place on the 7th of May 2026. Special arrangements apply to the handling of government business in the six weeks prior to the election, from 26 March 2026, known as the pre-election period. During the pre- election period, the Scottish Government retains its responsibility to govern, and Ministers remain Ministers and in charge of their portfolios. Essential business will continue. However, decisions on matters of policy on which the next administration might wish to take a different view from the current administration will be postponed until after the election, provided that such postponement would not be detrimental to Scotland's interest or wasteful of public resources. Election guidance for Scottish Government, its Agencies and National Devolved Public Bodies has now been published and is available at the link below:

[Scottish Parliament Election: 7 May 2026, guidance for the Scottish Government, its agencies and National Devolved Public Bodies - gov.scot](#)

Police Scotland CTSA update

- Scottish sites are in a good position for complying with the new security requirements by the 2029 deadline. In general, very few sites are currently compliant, but lots are nearly compliant and most are looking for solutions.
- CTSA's are in year two of the visit process. The first year of visits involved issuing the security requirements book, getting the books signed off and explaining the books, so these visits took a lot longer than the year two visits are expected to.
- Have faced particular issues with process line gauges as there is a lack of products that exist for them.
- The use of Annex E is the CTSA's decision, it's not led by the site, although it is done in discussion with the site and SEPA. It is a living document that will be reviewed annually to account for new products. It will only be considered where it is not possible to meet the requirements.
- It is not the CTSA's job to check what is in site security plans, the book describes what should be in there. Although CTSA's will work with sites to ensure the plan is appropriate.
- There have been a lot of questions from operators about the unspent criminal convictions part of personnel checks, which is one of the new additions to the book. The CTSA's are not expecting sites to do specific checks on people, rather it should be a self-referral process. The operator should ask the individual during employment if they have any unspent criminal convictions. There is a self-declaration form template that can be found on the NPSA website. This should be done on an annual basis.
- The biggest issues encountered have been for offshore. It is not practical to go out to visit the rigs, so it is currently more of a paperwork exercise. Some sites have hundreds of sources onboard. CTSA's have given presentations to the offshore industry on the new security requirements, and the industry is still in year one of visits.

- The CTSAs are not in a rush to sign sites off. More products are expected to come onto market soon. There has also been a lot of retesting of existing products.

It was raised that operators looking into security rated measures have been directed to the RedBookLive website, but there are thousands of products on there and it is challenging to search for products that are compliant with issue 8.1. CTSAs provided a demonstration of how to use the filters on RedBookLive.

Regarding the unspent criminal convictions: An example was given whereby an operator doesn't routinely repeat the security checks that are completed for new members of staff but instead relies on staff to communicate any changes in their criminal convictions. Typically, the requirement for staff to do this is via their agreement to comply with the IRR17 local rules which contain a statement regarding access to controlled areas that contain HASS sources. This was considered sufficient in the context of the example provided.

Regulator Updates

EA update

Feedback from inspections

Inspectors have recently come across several instances of leaking pipes, which have caused radioactive waste to leak into non-radioactive areas. Have also had past instances of misconnected drains, where plans didn't accurately reflect the actual drain routes. Worth checking the routes of drain runs are as expected, make sure they are marked with trefoils, ensure maintenance plans are adequate and take special care around joints which can be more vulnerable to leaks.

Medical radiopharmaceuticals containing longer lived contaminants

Some medical radiopharmaceuticals can contain small quantities of longer-lived contaminants. We will not list these contaminants separately in our permits but will set out in our guidance how we expect operators to take account of them. They must be considered when setting accumulation periods, to ensure there is adequate time for decay, and must also be taken into account when carrying out prospective dose assessments. Operators should let their local officer know that they are using radiopharmaceuticals that may contain contaminants, particularly when their radiological assessments are complex.

Revised ICRP dose coefficients

We have produced a joint statement, with the other UK Environment Agencies, on the adoption of the revised ICRP dose coefficients. We will continue to apply the dose coefficients from ICRP 119 until the Environmental Permitting Regulations have been updated. We will communicate implementation dates once they have been agreed. Until then, operators should continue to use the ICRP 119 values in their prospective dose assessments and our Initial Radiological Assessment Tool (IRAT) will remain valid.

Development of Surrender Guidance

We are developing guidance that will help operators to understand what is required when they want to surrender their permit. In particular, the guidance will cover what kind of information/evidence we expect a surrender application to contain, and it will also describe the two surrender tests for non-nuclear sites that are set out in the Environmental Permitting Regulations. We sent the draft guidance to members of our Small Users' Liaison Group (SULG) and asked for feedback earlier this year. We are hoping to publish the guidance in the coming months.

Revised Unsealed Permit Template

We are currently working to update the templates and guidance we use for unsealed source activities. We are combining several of our existing unsealed permit templates into one to streamline and simplify the permitting process, and at the same time we are updating some of the conditions to accommodate some of the changes we are seeing in the non-nuclear sector. The sector is very diverse, with some very simple operations, and increasingly more complex sites, so one of the main changes we are introducing is the requirement for operators to have a Waste Management Plan and a Decommissioning Plan. It is important to note we are taking a graded approach to this. We would only expect simple sites to have simple plans. These operators should be able to produce their plans using the guidance we will include in our revised How to Apply and How to Comply guidance documents, which are also being updated as part of our work to produce the new template. More complex sites will be expected to produce more detailed plans and so we are also producing some new additional guidance on waste management and decommissioning plans designed to help operators of more complex sites.

Publication of Compliance Assessment Report (CAR) Forms

Most Compliance Assessment Forms are already publicly available however we have decided to publish them online to improve transparency. We are taking a sector-by-sector approach, with water discharge, installations and waste CAR forms already available online. Radioactive Substances CAR forms (RASCARS) will follow in due course. It is important to note that RASCARS that relate to sealed sources or contain sensitive nuclear information are not publicly available now and will not be published online. We will only be publishing RASCARS issued after the 'go-live date', which we will communicate to operators once a date has been set. RASCARS will be held for 42 days, after being issued to operators, prior to being published online, to allow time for our appeals procedure to run.

Charging review

We recently consulted on proposed changes to our RSR charges. [Environment Agency charges consultation: radioactive substances regulation \(non-nuclear sites\) - GOV.UK](#). The consultation closed on 17 February.

There was a question about the standard rules permits for NORM industrial activity. There have been some permits that have been issued in recent years that still refer to IRR99 and EPR 10, when will these be updated?

EA's response: We are reviewing all three of our standard rules permit templates and the associated published rules. If changes are required to the rules themselves, we will need to consult on these changes first.

HSE update

- Work year 25/26 drawing to a close. Chiropractor inspection campaign almost complete. Early indications show relatively poor levels of compliance with IRR17. Inspection findings will be summarised and reported to Scottish Chiropractic Association and British Chiropractic Association. Findings and learning outcomes will also be fed back to the wider RP community through the upcoming HSE RPA Workshop.
- There have been no more updated RADAN safety assessment templates added to the HSE website since September 2025. The aim is to add updated templates by May 26.
- HSE is running its annual radiation protection adviser workshop in Manchester on 13 May 26. This will be a commercial event hosted by the HSE radiation team. Bookings can be made online at [Radiation protection adviser workshop » Health and Safety Executive](#).

- The full HSE radiation team will be attending the upcoming IRPA conference in Liverpool in June 26. They will make a number of presentations throughout the conference.
- The HSE radiation team welcomed Jonathan Fawcett to the team as a new radiation specialist inspector in January 26.
- HSE are due to advertise for a new radiation specialist inspector in the coming months.

There was a question about the HSE's targeted engagement towards of use of ionising radiation at airports. The focus was on baggage security scanning, but is the targeting of airports going to also include receipt of items such as radioactive consumables, check sources etc. from abroad? HSE's response: The focus won't be on the transport of radioactive materials, but it is unclear if this is storage or transport so the HSE will need to liaise with ONR to determine who has the vires for this.

ONR safeguards

1. ONR Safeguards qualifying nuclear facilities with limited operations (QNFLO) Team have planned inspections for the forthcoming financial year.
2. Following the post implementation review of Nuclear Safeguards (EU exit) Regulations (NSR19) an updated version of the regulations is due to be enacted later this year – around July time.

Impact on Safeguards QNFLO:

- Record retention changes from 5 to 30 years from the date the new legislation comes into force (circa July 2026).
- A new template is required from Operators to comply with the revised regulations. This will replace the current BTC - basic technical characteristics report. The new report is a DIQ (design information questionnaire) which aligns the UK with international standards.

- A transition period of one year after entry into force of revised NSR19 is planned.
 - Comms will be shared with all QNFLO operators prior to new legislation coming into force.
3. A webinar is planned to be delivered to QNFLO operators on 31 March 2026.
- Formal invites to go out by end of this week but a placeholder message has been sent to gauge audience interest. Approximately 70 operators have shown interest in attending.

Topics of discussion will be:

- The annual submissions.
- Addendum to Regulation 31.
- Revision of NSR19 and its impact.
- Accountancy and control plan.

ONR transport update

- Between July and December 2025, we carried out a number of inspections of dutyholders transporting radioactive materials, including consigners, consignees, carriers, packaging manufacturers and freight forwarders. Inspection analysis indicates non-compliances are more frequently found in dutyholders' arrangements for IRR17 Radiation Risk Assessments, IRR17 Contingency Plans, CDG09 Emergency Arrangements and ADR 1.7.3 Management Systems. Non-compliances have been observed with complex consignments involving several organisations, particularly involving international or overseas-based organisations who may be less familiar with UK legislative requirements. Our future inspections will specifically consider organisations involved in complex consignments and the availability and provision of advice from UK-based RPAs/DGSAs.

- Early in 2025, we served an improvement notice on Direct Rail Services Limited after failings were discovered within DRS' management system for the procurement of nuclear services. Direct Rail Services Limited has now made the required improvements and demonstrated compliance with relevant legislation. Further information on this is available from our website.
 - In October, an incident occurred at an in-transit storage facility that required the attendance of the emergency services. During the incident review it was identified that the attending emergency services staff were not knowledgeable of the risks and hazards of the site and did not fully understand the warning signs present. In response to this, a hazard marker has been placed on the facility at the emergency control centre which will inform any attending emergency services of the hazards before arriving. We have been asked to encourage dutyholders with in-transit storage facilities to consider informing their local police force of the location of the facility and request that a hazard marker be registered against it. If you are unable to find a contact for your local Police force, please contact ONR and we will assist.
 - A new IAB has been created (see attached) which identifies potential non-compliances associated with the use of the Gilligan Engineering Limited TecCase Type A package. It is important to note that we are not yet aware of any consequences to employees, the public or the environment from identified non-compliances with the law.
 - As Authorisation 500 is next scheduled for review on 30 April 2026, small users of radioactive material have been requested (via SULG and SNNILG) to provide the TCA with details of any specific issues they have encountered when disposing of waste containing uranium and thorium. The TCA will take the opportunity to try and address any issues.
 - In December, the IAEA issued Rev. 2 of SSR-6. Following the process for integration into model and modal regulations, the date for implementation via CDG09 is January 2029. Dutyholders should be aware that A1/A2 values in
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SSR6 Rev 2 have been revised. It is recommended that dutyholders review the new edition of SSR-6 and consider the potential impacts on their business and start planning for the 2029 implementation timescale.

- Further information is available within our latest TCA newsletter which covers July to December 2025 which has recently been published.

NIEA update

Gillian Wasson is still acting in the role of Chief Inspector for NIEA's Industrial Pollution and Radiochemical Inspectorate, and there are still a few vacancies. Currently the RSA team consists of two members of staff who are covering all aspects of RSA regulation, emergency response and also managing NIEA's environmental radioactivity monitoring program. We also represent NIEA and DAERA on a range of UK working groups and committees.

NIEA's inspection program runs April to March so we are currently finishing off the 2025/26 program. Barring any last-minute difficulties we're on track to complete a full program. All sites have been visited at least once and most sites that hold an authorisation to accumulate and dispose of radioactive waste have been visited twice. No significant issues or trends have been identified during inspections.

NIEA has continued to work with the other UK environmental regulators and NaCTSO regarding implementation of the new requirements for radioactive source security, which were issued in July 2024. We're currently planning the year 2 visits to these sites under the new regime and these should be carried out during the next quarter. We plan to start varying Certificates of Registration to reflect the new requirements over the next few months.

NIEA has also continued to be involved in discussions regarding Project Fieldfare along with the other environmental regulators. It's good to see some progress on this project.

A review of RSA fees and charges is currently being carried out.

Discussion on offsite disposal following medical administrations

A question was raised about the scenario of a nuclear medicine patient who resides in a care home, and who returns there following medical administration of a radiopharmaceutical at a hospital. The question was whether disposal by the care home of radioactive waste arising from the patient would be out of the scope of EASR18, on the basis of EASR Schedule 8, Part 1, 2(1)(c). The waste in question could involve disposals via a toilet, but also disposals of related solid waste such as incontinence pads.

The paragraph in EASR Schedule 8, Part 1, 2(1)(c) was written with the intention of accommodating that scenario. It includes both waste disposal via the toilet but also solid waste such as incontinence pads, but it doesn't necessarily include any auxiliary waste that isn't associated with human excreta such as syringes, gloves, bandages etc. Most hospitals have standard condition I which requires an assessment for this situation and allows them to take back any waste generated.

There is a SRPA short life working group looking into this. Different health boards currently have different solutions, some boards that have smaller numbers of nuclear medicine patients try to keep the patients in hospital, but this solution doesn't work for the busier health boards. Currently decisions are made on a case by-case basis.

New action: Any updates from the SRPA short life working group looking into offsite disposal following medical administrations to be shared with SNNILG when they become available.

HSE confirmed that they get a lot of enquiries about how IRR17 applies to patients going back to care homes. The advice is that they should consider the application of

IRR17 and they are likely to need registration. Care homes that may take radioactive patients in the future need to have a plan in place.

AOCB

The group expressed its thanks to John Burton for all his contributions to the group and wishes him well in his future endeavours.

Due to budget constraints, lunch will not be provided at the next SNNILG. A poll is to be sent round to determine if members are happy to bring or get their own lunch, or if the preference is to not hold SNNILG over lunch hours.

Update 26/03/2026: The poll was sent out and the majority voted to bring their own lunch so that SNNILG can be held at normal hours spanning lunchtime.

Date of next meeting

Next meeting will be held in person from 10:30am to 2pm on Wednesday
16th September 2026 at:

The Cuillin Room
University of Edinburgh
Charles Stewart House
9-16 Chambers Street
Edinburgh, EH1 1HT

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