

FORTY FORTH MEETING OF THE SCOTTISH NON-NUCLEAR INDUSTRIES LIAISON GROUP (SNNILG) – MINUTES

Date: Wednesday 17th September 2025

Time: 10:30-14:00

Location: Raeburn Room, The University of Edinburgh, Old College, South Bridge, Edinburgh EH8 9YL with TEAMS option

Attendees: SEPA – chair, secretariate & policy team reps, Association of University Radiation Protection Officers (AURPO), NHS Greater Glasgow and Clyde (NHS GGC), Scottish Schools Education Research Centre (SSERC), UK Health Security Agency (UKHSA), Scottish Radiation Protection Advisers (SRPA), Institute of Physics and Engineering in Medicine (IPEM), NHS Tayside, Ministry of Defence (MOD), Health and Safety Executive (HSE), Environment Agency (EA), Office for Nuclear Regulation (ONR) Transport, ONR Safeguards

Apologies: Scottish Government (SG), Society for Radiological Protection (SRP), Northern Ireland Environment Agency (NIEA)

Welcome, introduction and apologies

As noted above.

Actions arising

Action: SEPA to advice SNNILG of high-level changes to the Public Participation Statement and Fit and Proper Person Test which are out for consultation.

There are no substantive changes to the Public Participation Statement and the Fit and Proper Person Test. They have both been updated to include references to the other regulated activities where appropriate.

Action: SEPA to provide an update on the status of authorisation of radioactive substances that are part of abandoned offshore platforms.

All the offshore authorisations have been transitioned into EASR-style permits and registrations except for a small number of deemed sealed source permits that list sources on platform legs. We have been in contact with those operators to discuss and will be issuing EASR style permits for these in due course.

SEPA Update

General

Stakeholder survey

SEPA is conducting a survey “Experience and perceptions of engaging with SEPA: public, communities and stakeholder survey”. The survey is open now and runs until 28th September if you would like to contribute your views. The survey should take around 10–15 minutes to complete.

[Experience and perceptions of engaging with SEPA: public, communities and stakeholder survey - Scottish Environment Protection Agency - Citizen Space](#)

Interim Chief Operations Officer

Ross Haggart has been appointed as Interim Chief Officer for Regulation, Business and Environment (RBE) and has joined our Corporate Leadership Team last week.

Ross has had an extensive career in Scotland’s public sector, having served for 30 years with the Scottish Fire and Rescue Service (SFRS), latterly as Chief Officer before retiring late last year.

Operations Team Update

Team Updates

We have appointed a new specialist inspector who will cover non-nuclear sites in the central belt. With other internal promotions, this now means that the team is up to full complement which will allow us to return to a fuller inspection programme once the appropriate training has been completed.

Fieldfare

Fieldfare continues to progress. All interested parties should have been contacted by the Home Office, if not, please get in touch with the Home Office directly.

Security Requirements Document

All relevant parties should now have received copies of the updated Security Requirements Document and implementation continues as previously publicised. Most sites should have had first interaction with CTSA and initial discussions regarding any required changes to security provision.

There are several suitably rated products currently available, and more are being sent for testing. Be careful when looking at security equipment. Make sure that it has been tested against the appropriate standard, but more importantly, make sure that it passed those tests. CTSA will provide advice and guidance, and you should continue to liaise with them.

First inspections since the introduction of the updated SRD have revealed challenges for sites in accessing appropriately rated security products, however, as previously indicated, availability should improve gradually.

Mobile Radioactive Apparatus (MRA) - Operators should comply with the SRD whenever the MRA is stored at a temporary location. SRD states "equivalent security arrangements should be in place at temporary locations to those in place where the MRA is normally kept". The Site Security Plan should describe in detail how security will be maintained while MRA is at a temporary location.

A process is being developed by NaCTSO to allow appropriate parties to request access to SRD. Initially,

- Anyone wishing to request a copy of the SRD should request a copy of the form via SEPA's RS Enquiries.
- The applicant must then complete the form including justification for requiring the SRD. The form should be emailed to NaCTSO at the address at the bottom of the form. The justification will be considered by NaCTSO. Applicants should be aware that unless it is a fully justified and valid reason for having a copy, the default answer will be no.

New 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.

Contaminated items coming onshore

In August 2024 we wrote to offshore operators providing guidance about monitoring of equipment in offshore areas prior to sending it onshore. The overriding message being that where there is any doubt consider it to be radioactively contaminated and sent it to a permitted onshore facility. Typically, we have issued warning letters to those offshore companies who have sent contaminated items to unpermitted sites. Unfortunately, this is still happening on a regular basis. Therefore, we are considering what further regulatory action we may take.

General Inspection Findings

Site Security Plans do not contain enough detail regarding how security of MRA will be maintained while away from base location, particularly when going offshore. Clear indications of custody including receipt at offshore location and who is responsible for initiating action if MRA does not arrive when expected should be given. Likewise, for MRA returning, particularly where offshore location staff are responsible for loading the MRA onto relevant transport, these responsibilities should be clearly defined.

We are noticing that financial provision is not being updated in line with the costs of disposing of HASS sources. This is particularly for bank guarantees and is something that we will be paying particular attention to.

Policy Team Update

Environmental Authorisation (Scotland) Regulations 2018 (EASR)

With the regulation of waste management, water and industrial activities set to move under EASR on November 1st, we've now taken a major step forward by launching a new **Authorisations and Compliance** section on SEPA's beta website.

These pages are designed to help businesses apply for and comply with authorisations under EASR.

[EASR authorisations | Beta | SEPA | Scottish Environment Protection Agency](#)

Each authorised activity now has its own page, bringing together everything a business needs to know in one place. This includes:

- What type of authorisation they need.
- What conditions and charges apply.
- How to apply along with all the relevant forms.
- Guidance and sources of further information.

We've also included information about transitioning to EASR, so businesses can understand what's changing and what they need to do.

Environmental Performance Assessment Scheme (EPAS)

The EPAS project has continued with its digest of the consultation comments and is considering some changes to the performance calculation rules. The work is progressing, with all the Major Non-Compliance definitions being finalised. Once all of the responses have been considered a consultation digest will be produced and published on our website.

Consultations

Our consultations on the following closed on 12th May:

- [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 \(Near Surface GRA\)](#)

We have a cross-RSU project team now up and running to review and triage comments, to inform revision of the consultation drafts. Aiming to publish interim (very high-level, non-constraining) consultation digests around the 12-week post-consultation mark. The interdependencies, not only between our three documents, but also between SEPA's Near Surface GRA and EA & NRW's corresponding document, mean final publication will likely not be until spring/summer 2026.

Science Team Update

Sewer Modelling Tool

The release of the second version of the Radiological Dose Assessment Tool had been delayed due to erroneously high doses to wildlife for specific radionuclides being detected during our quality assurance steps. This investigation was prolonged by our contractor due to the necessity of checking the non-human biota DPUR values for each radionuclide (as updated by ERICA tool v1.3), spreadsheet calculations and the summer break period. The tool is undergoing a final testing period to be released before the year end.

There was then discussion on the changes to the ICRP dose coefficients. The ICRP is currently developing the 'Dose coefficients for intakes of radionuclides by members of the public' series (informally known as EIR (Environmental Intakes of Radionuclides)). This work is being carried out in parts and will update the public dose coefficients from those in ICRP Publication 119, which are used by all environmental regulations in the UK, when assessing doses from discharges. Parts 1-3 will cover all radionuclides for infants to adults. Parts 4-5 will specifically focus on the embryo/foetus and nursing infants. Part 1 is expected to be published in the next few months, part 2 in the next year and part 3 potentially in 2026/27. Parts 4-5 are expected to be published in a few years. It is likely that the parts will be adopted in stages.

Scottish Government Update

Higher Activity Radioactive Waste Policy and Strategy Review

We conducted our initial round of engagement with stakeholders last year. Thank you to everyone who provided information or took part in discussions. There will be further opportunity to input as we move through the review process and we will provide further updates as this work progresses.

A high level summary of some of the main views received is included below;

- A number of stakeholders asked for clarity around particular areas of the policy including;
 - the interface between the revised UK Radioactive Waste Policy and SG Policy;
 - the interpretation of near-site;
 - what is meant by retrievability;
 - what will happen to challenging wastes that will not be suitable for near surface disposal, including reconsideration of our policy regarding geological disposal;
 - the definition of near surface.
- Include consideration of sustainability, value for money, intergenerational equity and waste management principles considerations;
- Updates in light of technical developments over the last 13 years;
- The idea that radioactive waste can be disposed of be rejected in favour of indefinite storage and development of another solution;
- Any process or activity that involves new or additional radioactive discharges into the environment be opposed;
- The policy of 'dilute and disperse' as a form of radioactive waste management (i.e. discharges into the sea or atmosphere) be rejected in favour of a policy of 'concentrate and contain' (i.e. store safely on-site);
- The principle of waste minimisation be supported;
- The unnecessary transport of radioactive and other hazardous wastes be opposed;

- Wastes should ideally be managed on-site where produced (or as near as possible to the site) in a facility that allows monitoring and retrieval of the wastes;
- the term higher activity waste is confusing due to its similarity with the term high level waste and should be phased out.

Picking up on one of the key themes from this feedback, we have been working to update our understanding of the technical options available for HAW in Scotland as well as international comparators.

The next step for our HAW review is to undertake more detailed work to update our understanding of the technical impacts and opportunities of our current policy position including the long term storage of waste not suitable for near surface disposal. This will support a more robust consultation after Scottish Parliamentary elections in 2026 including supporting the development of the required impact assessments. To develop this technical information we will utilise the HAW Scotland Strategy Implementation Group (HAWSSIG) which includes the expertise for specialist input.

UK Health Security Agency Laboratory Visit

The team visited the UK Health Security Agency (UKHSA) laboratory in Glasgow on 7th of August. UKHSA are responsible for collecting and analysing the samples that are used in the annual Radioactivity In Food and Environment (RIFE) report. It was a very informative visit which allowed the team to see the processes and procedures that are used by the laboratory to assist in the creation of the RIFE report and make further links with UKHSA staff.

Regulator Updates

EA update

Nuclear and Radioactive Substances Changes

We have completed the move of all Nuclear and RSR Strategy staff as well as Regulatory Nuclear staff into the Chief Regulators Group. Jo Nettleton is the Chief Regulator (Director level) and Andy Mayall (Nuclear and Radioactive Substances Strategy) and Jim Ratcliffe (Nuclear Regulation) have taken on the Deputy Director posts on a temporary basis pending permanent recruitment. Our RSR (formerly known as non-nuclear) Regulatory teams remain in 6 teams reporting to Local Operations Area Directors. Colin Chiverton continues to act as the lead Operational Manager for these teams. Andy Mayall's Department provide Strategy advice to these teams and small users as well as the nuclear teams and users.

We are still awaiting the impacts of the Independent Water Commission review and the Nuclear Regulatory Taskforce.

Unsealed Radioactive Sources Permit Template Changes

At the June SULG meeting we summarised the work we are doing to update our unsealed permit templates and said we would be seeking SULG views on the main changes we are proposing. A note summarising these changes, and copies of the draft associated guidance has now been sent to SULG members with comments required by Friday 3 October.

In recent years we have seen an increase in the complexity of sites we regulate. More operators now make use of prolonged accumulation periods to decay radioactive waste as this has environmental benefits and can reduce costs. These factors have resulted in more complex waste management arrangements, and greater challenges when facilities are decommissioned.

To ensure that we can regulate effectively we intend to add a permit condition requiring operators to maintain waste management and decommissioning plans. We don't consider that this condition will impose an additional burden on operators but rather that it will clarify our expectations.

We are mindful of the fact that, whilst some operations with radioactive substances are complex, others are simple and straightforward. We will use a graded approach, where the condition is included for all operators, but we take a proportionate approach to its implementation. This will be explained in updated “How to comply” guidance.

Cost of Services Consultation Outcome and RSR Charges

The Environment Agency consulted on cost of service charge proposals between 16 April and 28 May 2025. Thank you for any feedback given. The proposals reflect our increased costs (due to inflation, pay awards and National Insurance) in continuing to operate and regulate businesses effectively, and include a contribution to the cost of digital transformation.

The proposals have been approved by ministers. Our [consultation response document](#) is published on GOV.UK along with the charging schemes.

[The Environment Agency \(Environmental Permitting and Abstraction Licensing\) \(England\) Charging Scheme 2022](#)

[The Waste \(Miscellaneous\) \(England\) Charging Scheme 2018](#)

We are implementing the updated charges as follows:

- For Radioactive Substances Regulation the increase is 7.5%.
- Annual subsistence charges apply for the full year 1 April 2025 - 31 March 26.
- We expect annual subsistence billing for Radioactive Substances to start in October 2025.
- Permitting application charges apply from 1 August 2025.

Publishing Compliance Assessment Reports

As part of our journey towards increased transparency, and to reduce the volume of information requests EA staff handle, we have started proactively publishing these forms, so they are now available online without having to request them. We will be doing this in stages, starting with water quality discharge CAR forms.

This is a process change, not a regulatory change. [CAR forms](#) are public register documents that need to be available for public inspection. Until now, we have met this obligation via the public contacting us and requesting copies. Forms will be published online after a 42-day holding period. CAR forms written before 28 February 2025 will not be published online, but all CAR forms are available for inspection by the public as public register documents and can be obtained through an information request:

This year we have seen a four-fold increase in the number of RSR questions from the public.

We anticipate that RASCARs, for unsealed source permits only, may be published sometime in 2026.

Security

We completed our first year inspections following introduction of the new security requirements. We have noticed that the implementation has prompted some Operators, that had long ago got rid of higher category material, to vary their permits.

We have added a "Quatrix Widget" to Gov.uk. This provides a secure upload capability for 'Sensitive information'. It allows users to proactively upload sealed source applications via a secure file transfer link. We will be considering what other uses we may be able to extend this to.

HSE update

HSE radiation team personnel update provided

HSE radiation team workplan 25/26 summarised: RADAN focus, priority local inspections following statutory notifications and concerns, chiropractors' inspections, offshore inspections, continue ongoing investigations, progress prosecution work.

Discussed prosecution of industrial radiography company from May 2025. On HSE website press release.

HSE radiation team held an RPA Workshop in Bootle in May 2025 – successful event. May be different venue in 2026 to accommodate more delegates.

RADAN summary provided – updated industrial radiography safety assessment template has been issued on HSE website. Other safety assessment templates to follow.

Small consultation to come on amending guidance on discharge definition in IRR17 (change from per release to annual, will propose using current value x 365 to offset burden).

ONR safeguards

The Addendum to The Nuclear Safeguards (EU Exit) Regulations 2019 Regulation 31. QNFLO operators have been sending updates. ONR require notification of receipt foreign (RF) and shipment foreign (SF) within 14 days of the transaction. This just needs to be reminded to operators as I believe there are some operators who have not informed ONR of such transactions. ONR will follow this up in due course.

ONR have communicated with many operators regarding their annual submissions of Physical Inventory Lists (PILs) and Material Balance Reports (MBRs). There are some misunderstandings of how to complete/calculate these forms. ONR hope for much better submissions in the new year following these discussions.

Findings from QNFLO inspections in general is that many BTCs and ACPs require review and update.

At a past SULG meeting an RPA suggested it would be beneficial to have ONR provide updates to some requirements of NSR19 Reg 31. This is something I am happy to consider and suggest perhaps tagging a session into HSE's Annual RPA meeting if that works. If there are any suggestions regarding topics RPAs would like to discuss/hear/learn about at such an event I would be interested in feedback.

ONR transport update

TCA have undertaken a number of transport compliance inspections so far this year on nuclear and non-nuclear dutyholders. These inspections once again identified the following thematic areas of non-compliance:

- Inadequate management systems.
- Inadequate radiation risk assessments.

- Inadequate training and competency.

Transport dutyholders must also have (as appropriate) IRR17 notification, registration and consent from ONR or the Health and Safety Executive (HSE) before transporting Class 7 dangerous goods. Dutyholders should note that 'transport' is not only 'physical carriage' and that this is still a requirement for loading, unloading or in-transit storage of Class 7 dangerous goods. Dutyholders should specifically note that if they are transporting high activity sealed sources (HASS) as defined in IRR17 Regulation 2 and Schedule 7, they require IRR17 consent. Dutyholders should ensure that all organisations within their transport chains have appropriate notification, registration and consent and should stop using any organisation who does not.

Four IABs have been produced by the TCA which can be used by dutyholders to adapt their arrangements to secure compliance with the law:

- Importers and freight forwarders – identifies the legal responsibilities of organisations who organise, plan and contract for Class 7 dangerous goods to be transported but do not handle them directly.
- One single transport document – identifies the requirement to have a single dangerous goods transport document covering the full end-to-end journey of a consignment.
- Hospital package delivery and return – identifies the responsibilities of dutyholders to manage the receipt and return of packages – especially when delivered out-of-hours.
- Use of non-OEM sources in QSA Global 880 packages – identifies the legal requirements regarding the use of non-OEM (third-party) sources in both competent authority-approved and non- CA approved packages.

This information is available on the SRP website (can provide a copy to be shared with the minutes of the meeting)

ONR have recently signed a revised Memorandum of Understanding (MoU) with the Office of Rail and Road (ORR) to clarify responsibilities when Class 7 dangerous goods are being transported by rail.

The following ONR guidance have been revised:

- NS-INSP-GD-066 - The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 – Schedule 2 – Radiation Emergencies.
- NS-INSP-GD-075 - Type A Packaging – Design Compliance
- An updated version of SSR-6 (including updated A1/A2 values) is due for publication by the IAEA at end of 2025 or early 2026. These changes will then be incorporated into the modal regulations, likely from 2027 onwards.

From 1 January 2026, dutyholders transporting HASS classified as category A, B or C by road through France, must hold an ANSR authorisation. Further information is available from their website.

We have updated our FAQ page on our website to include questions such as:

- I am an international carrier wanting to transport Class 7 Dangerous Goods within Great Britain (GB). I currently have a Radiation Protection Programme (RPP) in accordance with ADR 1.7.2. Is this compliant with UK legislation
- In cases where a competent authority approval is renewed against SSR-6 2018 and the “-96” modifier is removed from the certificate of approval, does the package marking need to be changed to align to the revised certificate identification?
- In cases where packages that do not require competent authority approval (self-approved packages) include a “-96” modifier as part of the identification on the package marking, does the package marking need to remove the modifier after 31 December 2025?

Further information is available within the TCA newsletter which is on the ONR website. If you would like to be added to the mailing list please send an e-mail to class7@onr.gov.uk

Discussion followed on the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG). The NHS identified that it was sometimes difficult to check that the source carriers they use are fully compliant with the regulations as the carriers were unwilling to share security plans, on the basis that the NHS are not the duty holders.

New Action: ONR transport to confirm whether they can assist NHS to get sight of a carriers' emergency and/or contingency plans under CDG to allow them to have confidence that the carrier is fully compliant with CDG.

Post meeting response: ONR is unable to share duty holder's documentation. Note there are provisions within IRR17 and CDG which require cooperation between dutyholders/employers and we consider the management system requirements within ADR to include appropriate due diligence of contractors.

NIEA update

Post meeting update

Gillian Wasson is still acting in the role of Chief Inspector for NIEA's Industrial Pollution and Radiochemical Inspectorate. As a result of this, and other staff changes, the RSA team has been under-staffed for some time. However, we have now been joined by a new inspector, Alison White, and so we now have a full inspection program planned for 2025/2026. Alison has joined initially on a 12 month secondment but we're hoping that this can become a long-term arrangement.

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. The site inspections for the first year of the program have been carried out and CTSA have made their recommendations to achieve compliance at each site. 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.

Work to develop NIEA's proposed new Environmental Permitting Regime has been paused and no timescale has been set for resumption. However, some aspects of this work will be taken forward, for example the digital transformation project.

AOCB

The current SNNILG secretariate (LA) will be stepping down and handing over to LC. LA will continue to attend SNNILG in a policy capacity.

Date of next meeting

Next meeting is confirmed for **Wednesday 18th March 2026** via TEAMS.

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