

# Consultation on the Radioactive Substances Activities Charges Explanatory note

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## Contents

1	Objective .....	4
2	Background .....	4
3	What are the charges / components for the revised scheme?.....	5
3.1	Charges for Permitted Activities .....	5
3.1.1	Removed Descriptors .....	5
3.1.2	New Applications .....	5
3.1.3	Applications for changes to existing permits .....	6
3.1.4	Subsistence Charges .....	6
3.2	Common Elements of Charges .....	6
3.2.1	Retail Price Inflation (RPI) Increases .....	6
3.2.2	Payment Reference .....	6
	Question 4: Are the new descriptors an improvement and do they make things clearer? .....	6
	Question 5: Will the removal of the descriptors affect your organisation? .....	7
	Question 6: What are your views on the proposed changes in application charges? ....	7
	Question 7: What are your views on the proposed changes in subsistence charges? ..	7
	Question 8: What are your views on all the other aspects of charging (e.g. RPI increment, and payment referencing)? .....	7
	Question 9: Do you have any other comments to make about this consultation? .....	7
4	Opportunities to Discuss Charging .....	7

## 1 Objective

This explanatory note provides some additional background to the 2020 “[Consultation on the Radioactive Substances Activities Charges](#)” which has been published for consultation on the [SEPA consultation hub](#).

## 2 Background

The published “Consultation on the Radioactive Substances Activities Charges” (Charging Consultation) lays out the main proposed points and changes what are intended to be made to the current charging scheme (<https://www.sepa.org.uk/regulations/authorisations-and-permits/charging-schemes/charging-schemes-and-summary-charging-booklets/>).

This explanatory note will follow the same layout and format of the Charging Consultation, with each section numbered below corresponding to the numbered section within the Charging Consultation.

In an attempt to make the charging scheme easier to relate to the type of radioactive substance activity which can be applied for, the charging “legal description” was altered and now also includes a brief heading in bold. It is hoped that this will aid operators in swiftly identifying which activity should be applied for, and what subsistence fee will apply.

It should be noted that the costing which SEPA is required to recover, will include, but not be limited to tasks such as, policy work; environmental monitoring; database maintenance; inspections; securing and storage of records, sector engagement, administration, data returns and regime support.

## **3 What are the charges / components for the revised scheme?**

### **3.1 Charges for permitted activities**

Please note that section 3.1 highlights only the main changes which are proposed. This section should be read in conjunction with the current Charging Scheme documents.

#### **3.1.1 Removed Descriptors**

With the continued transition from the Radioactive Substance Act 1993 to that of the new regime under the Environmental Authorisations (Scotland) Regulations 2018 (EASR), certain descriptor charging types will become redundant. As such four charge types are proposed to be removed as the charges have either become redundant or are captured elsewhere under the EASR charges.

#### **3.1.2 New Applications**

With regards to the current SEPA charging scheme, it was highlighted that whilst registrations are lower risk activities and should require less resources to determine compared to those activities where a more complex Permit/Authorisation would be required, that some registrations were costed higher than Permits/Authorisations. Charges are set to reflect the levels of regulatory effort and support required to make the determination.

It should also be noted that whilst there is a charge proposed for EASR offshore Registrations, that this is being put into place for the point where RSA'93 becomes fully superseded by EASR for offshore activities.

For all other types of application not listed in the table, the only changes intended would be to adjust the charges in line with RPI as stated within section 3.2.1 of the Charging Consultation.

### **3.1.3 Applications for changes to existing permits**

With the transition from RSA'93 to that of EASR, SEPA elected to have a “zero charge” for transfers to allow for the, at the time, new EASR regulations to embed more smoothly. Enough time for this transition has passed to a point whereby SEPA must once again begin to charge for transfers, and recover the cost which SEPA incurs for processing transfer applications.

### **3.1.4 Subsistence charges**

Given that there exists a wide array of different types of Permits, Authorisations, Registrations and Notifications, the volume of time, effort and resources expended overall for each type of licence was examined.

The decision was taken to simplify the subsistence charging structure into that of three broad categories, namely

- Permit / authorisation level;
- Registration level;
- Notification level

## **3.2 Common elements of charges**

### **3.2.1 Retail Price Inflation (RPI) increases**

No additional notes for this section.

### **3.2.2 Payment Reference**

No additional notes for this section.

### **Question 4: Are the new descriptors an improvement and do they make things clearer?**

It was thought that by altering the descriptor to better match the wording which exists within licences issued by SEPA, and by providing a brief heading in bold, it would better aid

operators and prospective operators alike in quickly finding the relevant charge for the activity that they currently/are proposing to undertake.

For example “*EASR HASS Permit*” or “*Outwith Scotland Registration*” and the descriptors given below these headings are the same as those provided within the Radioactive Substances Authorisation Guide.

**Question 5: Will the removal of the descriptors affect your organisation?**

This question 5 refers to the charging descriptor categories (Table 3-1), not radioactive substance activities. Some have been removed as they are now redundant and others will still be undertaken but under a different descriptor category under the new 2021 charging scheme.

**Question 6: What are your views on the proposed changes in application charges?**

No additional notes for this section.

**Question 7: What are your views on the proposed changes in subsistence charges?**

No additional notes for this section.

**Question 8: What are your views on all the other aspects of charging (e.g. RPI increment, and payment referencing)?**

No additional notes for this section.

**Question 9: Do you have any other comments to make about this consultation?**

No additional notes for this section

## **4 Opportunities to Discuss Charging**

No additional notes for this section.

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